

**SUMMARY OF DECISIONS
REQUESTED IN
SUBMISSIONS TO**

**PROPOSED PLAN CHANGES 26-27
BIODIVERSITY**

CLUTHA DISTRICT PLAN

Summary of Decisions Requested in Submissions to Proposed Plan Change 26-27: Clutha District Plan Biodiversity

Submitter Number and Name	Specific provisions of the proposed plan change that my submission relates to	Submission i.e. whether the submitter supports or opposes specific provisions	The following decision is sought
1. Clutha Agricultural Development Board	<ul style="list-style-type: none"> • Policy HER 2A • Policy HER 2C • Rule RRA 13 • Plan Change 27 – Definitions 	Supports with amendments	<p>Policy HER 2A - Need clearer definition of methods to avoid, remedy or mitigate adverse effects. Follow definitions in Biosecurity Act 1993 for plant pests or animal pests.</p> <p>Policy HER 2C - Supports.</p> <p>Rule RRA 13 - Rules seem logical and practical; May be difficulty in ensuring that landowners notify Council under RRA 13(a) (i) and (ii) within 3 months. Is there a better way of doing this? Recommends that significant wetlands between 1-2 hectares need to be addressed and that spread of pests into wetlands needs consideration.</p> <p>Plan Change 27: Definitions - Supports but suggests inclusion of a definition of biodiversity (aligned with ORC definition) and clarification of issue of wilding pines and shrubs.</p>
2. Contact Energy Ltd	<ul style="list-style-type: none"> • Policy HER 2B 	Requests amendments to Pol HER 2B.	<p>Policy HER 2B - Expand criteria in (a) by definition/example/description to provide context and guidance as to what is intended and how they should be applied; Delete reference to Statement of National Priorities for Protecting Rare and Threatened Indigenous Biodiversity on Private Land; Identify what indigenous vegetation is to be classified as significant by accurate mapping at appropriate scale.</p> <p>OJB HER.2 - Amend to remove reference to "a representative range" and include reference to "protection" of districts' natural and physical resources.</p> <p>Pol HER.2A - Amend by adding "offsetting or environmental compensation" to (b); add "natural character to (f); add a new assessment matter "(i) the purpose the land is held for."</p> <p>Pol HER 2B – Amend by adding the words "and functioning to the ecological context reference in (a); adding "(c) the ecosystem services provided"; adding "(d) the effects of removal or modification of indigenous vegetation on landscape and natural character vales"; adding "(e) the significance of the indigenous vegetation or indigenous fauna from an iwi perspective"; adding the words "or any table</p>
3. Director-General of Conservation	<ul style="list-style-type: none"> • OBJ HER.2 • Pol HER. 2A • Pol HER. 2B • Pol HER. 2C • Rule RRA.13(a) • Rule RRA.13(b) • Rule COA.6 • Definition of Indigenous vegetation and clearance, modification or removal of indigenous vegetation • Definition of wetland 	Generally supports overall intent with amendments	

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			<p>substituted in their place" to the current (c) of this policy.</p> <p>Policy HER2C - Retain as notified.</p> <p>Policy Rule RRA.13 (a) - Retain as notified.</p> <p>Rule RRA.13(b)(iii) - Amend to read "Clearance...classified by the Department of Conservation as having a threat classification of either "Threatened or "At Risk declining"; Add the following new section "(v) The clearance, modification or removal of indigenous vegetation from any site identified on any District Plan map as being Esplanade Reserves (existing Crown Land margin, Esplanade Reserve, Esplanade Strip, Riverbank Reserve or unformed legal road adjoining a river, stream, except in the circumstances provided for under (a) Permitted activities (a)(iii) to (a) (ix above)."</p> <p>Rule COA.6 - Retain as notified</p> <p>Definition of indigenous - Retain as notified</p> <p>Definition of indigenous vegetation and clearance, modification or removal of indigenous vegetation - Retain as notified.</p> <p>Definition of wetland - Retain the as notified.</p> <p>OBJ HER2 - Retain as notified.</p> <p>Pol HER 2A(f) - Delete.</p> <p>Pol HER.2B - delete time bound reference to a statement of national priorities or include words that provide for that to be updated reference over the life of the plan; include additional provision that provides assessment criteria to consider the viability or self-sustaining nature of a particular site.</p> <p>Pol HER 2C - Retain as notified.</p> <p>Rule RRA.13 – amend by inserting in (v) "and existing fire breaks and new fence lines".</p> <p>Rule RRA.13(b) - make this rule a restricted discretionary activity and delete provision (iii).</p>
4. Federated Farmers of New Zealand	<ul style="list-style-type: none"> • OBJ HER.2 • Pol HER. 2A • Pol HER. 2B • Pol HER. 2C • Rule RRA.13(a) • Rule RRA.13(b) • Rule COA.6 	Supports plan change in part.	

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5. Genesis Power Ltd	Rules COA.6 and RRA.13	Oppose in part. Conflict between Rule COA.6 and Rule RRA.13. Opposes Rule RRA.13 (b) (iii).	<p>Rule COA.6 - add fire breaks and new fence lines to list of exemptions; map or more clearly define wetlands and sand dunes for the purposes of the policy.</p>
			<p>Rule COA.6 – Delete.</p> <p>Rule RRA.13 – retain with amendments as follows:</p> <p>Rule RRA.13 - Indigenous Vegetation and Habitats of Indigenous Fauna</p> <p>(a) Permitted Activities</p> <p>The following are permitted activities:</p> <p>...</p> <p>(v) The clearance, modification or destruction of indigenous vegetation necessary for the operation and/or maintenance of:</p> <ul style="list-style-type: none"> • Existing farm tracks and existing fence lines; • Existing utilities and infrastructure and <u>associated access tracks</u>; • Existing electricity generation facilities and <u>associated access tracks</u>. <p>but excluding the expansion or upgrading of these activities except where otherwise permitted by this plan.</p> <p>(vi) The clearance, modification or destruction of indigenous vegetation for the purposes of maintaining existing formed roads and other existing transportation networks, and for traffic, marine or aviation safety (including the maintenance of related signs and navigational structures) and which is undertaken by or on behalf of the authority responsible for maintaining that safety.</p> <p>(vii) The removal of wind thrown trees or dead standing trees which have died as a result of natural causes and present a direct threat to safety of people or property.</p> <p>(viii) The clearance, modification or removal of exotic and/or defined plant pests species undertaken for the purpose of maintaining or enhancing the existing state of the remaining indigenous vegetation.</p> <p>(ix) The clearance, modification or removal of indigenous vegetation that is consistent with a reserve management plan approved under the Reserves Act or is consistent with an approved conservation management strategy.</p> <p>(x) <u>The clearance, modification or destruction of up to 0.5ha of</u></p>

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6. Otago Fish and Game Council	<ul style="list-style-type: none"> • OBJ HER.2 • Pol HER. 2A • Rule RRA.13(b) • Other matters 	Opposes parts of the plan change with amendments requested. Requests amendments that better provide for proposed National Policy Statement on Biodiversity, LENZ threat class map and Otago Sports Fish and Game Bird Management Plan. Various amendments requested to provisions to	<p>indigenous vegetation per site for the purposes of any activity.</p> <p>Subject to compliance with the following rules and conditions:</p> <ul style="list-style-type: none"> • That, with respect to Rule RRA.13(a)(i) and (ii) and (x), within 3 months of the clearance or modification work, notice is provided to Council that identifies on a plan the extent of land that has been cleared and the extent of the property from which the vegetation has been cleared; • Rule RRA.8 and Rule RRA.9; • Rule WAT.4.; • The restrictions set out in Rule RRA.13 (a) (i), (ii) and (x) above; • Clearance, modification or removal of indigenous vegetation from any area listed in Table 13.8; • Clearance, modification or disturbance of wetlands identified in Table 13.5 or other wetlands 2 hectares or greater in area. <p>(b) Restricted Discretionary Activities</p> <p>Any activity which does not comply with the permitted activity conditions in (a) is a restricted discretionary activity, except for electricity generation and associated activities which are to be assessed under Rule 2(b) of the Energy Section.</p> <p><u>Discretion shall be restricted to the management of any adverse effects resulting from non-compliance with the relevant condition(s).</u></p> <p>(b) Discretionary Activities</p> <p>The following are discretionary activities:</p> <p>(i) Any activity that exceeds the restrictions set out in Rule RRA.13 (a) (i) and (ii) above;</p> <p>(ii) Clearance, modification or removal of indigenous vegetation from any area listed in Table 13.8;</p> <p>(iii) Clearance, modification or removal of indigenous vegetation from any area which provides habitat for indigenous plants, animals and fungi that are classified by the Department of Conservation as "Threatened" or "At-risk-declining";</p> <p>(iv) Clearance, modification or disturbance of wetlands identified</p> <p>LENZ threat class maps - Add LENZ threat class maps to plan change.</p> <p>OBJ HER.2 - Re-write to read" To ensure that a representative range of the District's indigenous vegetation and habitats of indigenous fauna are protected whilst still providing for their on-going use where</p>

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		address stronger emphasis on protection, riparian vegetation, small wetlands, ecosystem services, effects on gamebirds, and other incentives.	<p>appropriate as part of the management of the District's natural and physical resources"</p> <p>Policy HER 2A - add "(x) Effects on gamebird resources."</p> <p>Policy HER 2A(c) - include new criterion as follows – avoiding adverse effects on the indigenous values in question; where adverse effects on values cannot be avoided, provide for on-site remediation; where adverse effects cannot be remedied, provide for mitigation to otherwise avoid worse effects; where adverse effects cannot be mitigated, ensure that any residual adverse effects (that are more than minor) are offset in accordance with the NPS guidelines on biodiversity offsetting (Schedule 2).</p> <p>Rule RRA.13 (b) - add new criterion: (v) The clearance of indigenous riparian vegetation on streams with permanent flow.</p> <p>Wetland size - Reduce threshold to 1 hectare.</p> <p>Ecosystem services - Include more detailed criteria for assessment of ecosystem services.</p> <p>Incentives - Include following incentives: resource consent fee relief; financial incentives for fencing wetlands; mention biodiversity fund.</p> <p>Rule COA.6 - Retain</p> <p>Rule RRA.13 - The removal of indigenous vegetation from any wetland is excluded from permitted activity (i.e. requires consent).</p> <p>Table 13.5 - amend to include those Regionally Significant Wetlands identified in Schedule 9 of the Regional Plan: Water for Otago (following Plan Change 2 becoming operative).</p>
7. Otago Regional Council	<ul style="list-style-type: none"> • Rule RRA13 • Rule COA.6. • Table 13.5 	Supports intent of the plan change.	<p>OBJ HER.2 - Amend as follows:</p> <p>Objective HER 2</p> <p>To ensure that a representative range of the District's indigenous vegetation and habitats of indigenous fauna is recognised and appropriately provided for in the engaging use and management of the District's natural and physical resources.</p>
8. Royal Forest and Bird Protection Society of New Zealand Incorporated	<ul style="list-style-type: none"> • OBJ HER.2 • Pol HER. 2A • Pol HER. 2B • Pol HER. 2C • Rule RRA. 13 • Rule COA.6 	Supports in part. Does not agree that the value of SNA approach is questionable and refers to identification requirements under proposed NPS and RPS.	

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	<ul style="list-style-type: none"> Plan Change 27 Section 5 Definitions 		<p>New objective - Add the following new objective:</p> <p>Objective HER 3 <u>The potential adverse effects from activities on areas of indigenous vegetation, habitats of indigenous fauna, and indigenous biodiversity and functioning are avoided, remedied or mitigated.</u></p> <p>Policy HER.2A - Amend as follows:</p> <p>Policy HER2A – Assessment Matters for determining effects on <u>significant natural values-indigenous vegetation and habitats of indigenous fauna</u></p> <p>In assessing any application for resource consent that involves the <u>clearance, modification or removal of indigenous vegetation or the clearance, modification or removal of any habitat of indigenous fauna</u> the Council shall have regard to the following matters <u>to determine the appropriateness or otherwise of the proposed activity:</u></p> <p>...</p> <p>(b) Methods proposed</p> <ul style="list-style-type: none"> <u>Replanting with eco-sourced indigenous species</u> <p>(e) <u>Any proposals to compensate for or to redress biodiversity loss providing they meet the principles set out in Schedule xxxx Biodiversity Offsetting/compensation principles-including setting-aside reserves/protected areas-elsewhere-or-funding-initiatives;</u></p> <p>(e) <u>Whether the application includes a forest management plan or system of implementation prepared to a standard at least equivalent to a plan approved under Part IIIA of the Forests Act 1949.</u></p> <p>...</p> <p>(f) <u>Any landscape, natural feature or other amenity related values of the land</u></p> <p>(h) <u>Where the subject property has been involved in any previous assessment processes, the outcome of such assessments.</u></p> <p>(i) <u>Whether the affected indigenous vegetation or habitat of indigenous</u></p>

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			<p>fauna is one of the four priorities specified in the Statement of National Priorities for Protecting Rare and Threatened Indigenous Biodiversity on Private Land (MfE 2007):</p> <p>(i) Whether the area has been identified in Table 13.5 or Table 13.8.</p> <p>Policy HER.2B - Amend as follows:</p> <p>In assessing any application for resource consent that involves the clearance, modification or removal of indigenous vegetation or the clearance modification or removal of any habitat of indigenous fauna the significance of the resource shall be determined by regard to the following matters:</p> <p>(a) The representativeness, rarity and distinctiveness, diversity and pattern and its relationships with other areas of indigenous vegetation and habitats of indigenous fauna (ecological context) of the indigenous vegetation or habitat of indigenous fauna.</p> <p>(a) <u>significance criteria:</u></p> <p>Representativeness</p> <ul style="list-style-type: none"> • <u>The extent to which indigenous biodiversity represents what was originally characteristic of the ecological district.</u> <p>Diversity & pattern</p> <ul style="list-style-type: none"> • <u>The extent of natural diversity present within an area. This includes physical, habitat, biological, genetic and ecological processes.</u> • <u>Biological diversity can be further subdivided into species (number of species and abundance) and community diversity.</u> • <u>Ecotones are particularly important as transitions between adjacent communities or patterns as they are usually very productive and support high species diversity.</u> • <u>Some areas are naturally of low diversity, but support the full range of diversity expected for that habitat type.</u> <p>Rarity & distinctiveness</p> <p><u>These two are often combined because of their similarities and relationships, e.g. uncommon, unusual or atypical.</u></p> <ul style="list-style-type: none"> • <u>The extent to which an area supports an indigenous species, habitat or community which is rare in the ecological district or threatened/at risk nationally.</u>

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			<ul style="list-style-type: none"> •<u>The extent to which an area supports uncommon physical and ecological features in the ecological district.</u> •<u>The extent to which an area is characterised by endemism, relict distributions, type localities, distribution limits, atypical bedrock/habitats, unique or specialised species. This includes geological, scientific or other special features.</u> •<u>Supporting protected indigenous fauna for some part of their life-cycle (e.g. breeding, feeding, moulting, roosting), whether on a regular or infrequent basis;</u> •<u>playing an important role in the life-cycle of protected migratory indigenous fauna;</u> <p>Naturalness</p> <ul style="list-style-type: none"> •<u>The extent to which the area is modified by human activity, including the presence of weeds or pests.</u> •<u>This must be assessed at the ecological district scale to reflect the degree of modification that is characteristic of that district.</u> <p>Ecological context</p> <ul style="list-style-type: none"> •<u>The extent to which the area has ecological value due to its location and functioning in relation to its surroundings e.g. hydrology, pollination and dispersal.</u> •<u>An area may be ecologically significant because of its connections to a neighbouring area, or as part of a network of areas of fauna habitat, or as a buffer.</u> •<u>The degree to which the size and shape of an area contributes to its natural diversity. Larger areas and its life supporting or carrying capacity. Larger areas tend to support greater natural diversity, and compact areas are less influenced by edge effects.</u> •<u>Small areas do contribute to total genetic diversity and may be viable habitats for invertebrates and threatened plants. They can also collectively have increased value e.g. scattered small wetlands used by waterbirds.</u> <p>(b) Whether the affected indigenous vegetation or habitat of indigenous fauna is one of the four priorities specified in the Statement of National Priorities for Protecting Rare and Threatened Indigenous Biodiversity on Private Land (MfE 2007);</p> <p>(c) Whether the area has been identified in Table 13.5 or Table 13.8.</p>

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			<p>Policy HER.2C - Clearly articulate what rules are being referenced in the fifth bullet point, and if this is inappropriate and inconsistent with the RMA delete this bullet point from Policy HER.2C.</p> <p>Explanation page 2 - Amend as follows:</p> <p><u>This section of the Plan reflects Part 2 of the RMA, by recognising that managing the use, development and protection of indigenous vegetation and habitats of indigenous fauna is a matter of national importance.</u> Section 6(c) of the Act requires that Council recognises and provides for the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna when exercising its functions and powers under the Act. However this section is not an end or objective on its own but is accessory to the principal purpose of the Act. It is but one of many matters that Council must consider when determining whether a resource consent application promotes the sustainable management of the District's natural and physical resources. This policy framework enables Council to assess the attributes of the proposal and the values significance of the affected resource on a case by case basis against the identified matters to determine the appropriateness of the proposed activity. This is considered the approach that will best promote the sustainable management purpose of the Act.</p> <p>Rule RRA.13(a) – amend as follows:</p> <p>The following are permitted activities:</p> <ul style="list-style-type: none"> (i) The complete clearance or clear felling of up to 2.1 hectares of indigenous vegetation from land contained within one certificate of title or from land held as one property except as provided for in (b)(ii) to (iv) below. (ii) The selective removal or selective modification of indigenous vegetation over an area of up to 5 hectares of indigenous vegetation located within land contained within one certificate of title or within land held as one property except as provided for in b (ii) to (iv). (iii) The clearance, modification or harvesting of indigenous vegetation which: <ul style="list-style-type: none"> a. has been planted and managed specifically for the

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			<p>purpose of harvesting or clearing, <u>except within 20m of any permanently wet or continually flowing water body</u>; or</p> <p>b. is reasonably necessary to enable the management, harvesting or replanting or any area of planted indigenous or exotic vegetation, <u>except within 20m of any permanently wet or continually flowing water body</u>; or</p> <p>c. has been planted and/or managed as part of a garden or gardens or has been planted for amenity purposes.</p> <p>(iv) The clearance, modification or destruction of indigenous vegetation which has regrown naturally on land which was lawfully cleared of vegetation after 2000, <u>except within 20m of any permanently wet or continually flowing water body; or has been utilised as production land as defined in the Act since 14 January 1995.</u></p> <p>(v) The clearance, modification or destruction of indigenous vegetation necessary for the operation and/or maintenance of:</p> <ul style="list-style-type: none"> - existing farm tracks and existing fence lines - Existing utilities and infrastructure - Existing electricity generation facilities <p>but excluding the expansion or upgrading of these activities except where otherwise permitted by this plan.</p> <p>(vi) The clearance, modification or destruction of indigenous vegetation for the purposes of maintaining existing formed roads...on behalf of the authority responsible for maintaining that safety, <u>excluding the expansion or upgrading of these activities.</u></p> <p>Rule RRA.13(b) – amend as follows:</p> <p>The following are discretionary activities;</p> <p>(i) Any activity that exceeds the restrictions set out in Rule PRA 13 (a) (i) and (ii) above.</p> <p>(ii) Clearance, modification or removal of indigenous vegetation from any area listed in Table 13.8.</p>

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			<p>(iii) Clearance, modification or removal of indigenous vegetation from any area which provides habitat for indigenous plants, animals and fungi that are classified by the Department of Conservation as "Threatened" or "At risk: declining,"</p> <p>(iv) Clearance, modification or disturbance of wetlands identified in Table 13.5 or other wetlands 2 ha or greater in area.</p> <p>Non-complying activities - Add the following Non-complying activities to Rule RRA.13:</p> <p><u>(C) Non Complying Activities</u></p> <p>(i) <u>Clearance, modification or removal of indigenous vegetation from any area meeting criteria for significance in Policy HER 2B.(as amended above)</u></p> <p>(ii) <u>Clearance, modification or removal of indigenous vegetation from any area listed in Table 13.8.</u></p> <p>(iii) <u>Clearance, modification or removal of indigenous vegetation from any area which provides habitat for indigenous plants, animals and fungi that are classified by the Department of Conservation as "Threatened" or "At risk, declining,"</u></p> <p>(iv) <u>Clearance, modification or disturbance of wetlands identified in Table 13.5 or other wetlands 2 ha or greater in area.</u></p> <p>Rule COA.6 – amend as follows:</p> <p>Except in accordance with the exceptions listed below, the clearance, modification or destruction of indigenous vegetation or the modification of any wetland or sand-dune shall be a discretionary activity.</p> <p>The following exceptions shall apply to this rule:</p> <p>(i) The clearance, modification or harvesting of indigenous vegetation which:</p> <p>a. Has been planted and managed specifically for the purpose of harvesting or clearing, <u>except within 20m of a permanently wet or continually flowing water body; or</u></p>

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			<p>b. Is reasonably necessary to enable the management, harvesting or replanting of any area of planted indigenous or exotic vegetation, except within 20m of any <u>permanently wet or continually flowing water body</u>; or ...</p> <p>(ii) The clearance, modification or destruction of indigenous vegetation which has re grown naturally on land which was lawfully cleared of vegetation <u>after 2000, or has been utilised as production land as defined in the Act since 14 January 1995</u>.....</p> <p>(iii)</p> <p>(iv) The clearance, modification or destruction of indigenous vegetation for the purposes of maintaining existing formed roads...on behalf of the authority responsible for maintaining that safety, <u>excluding the expansion or upgrading of these activities</u>.-</p> <p>(v)</p> <p>Subject to compliance with the following rules and conditions: (a)- (b) <u>(c) PRA13c</u>.</p> <p>Definitions – amend as follows:</p> <p>Vegetation Clearance: means the felling, clearing or modification of trees or any vegetation by cutting, crushing, mulching, cultivation, (including direct drilling), spraying (including water or effluent) or burning. Clearance of vegetation shall have the same meaning.</p> <p>Indigenous Vegetation: Means a plant community in which species that are indigenous to that part of New Zealand are important in terms of coverage, structure and/or species diversity.</p> <p>Schedules - Add a schedule, as set out in the submission, that sets out principles to be applied when considering a biodiversity offset/environmental compensation.</p> <p>Rules RRA.13 and COA.6 - Ensure rules provide for the clearance, modification or destruction of indigenous vegetation necessary for the</p>
9. Transpower NZ Ltd	Rules COA.6 and RRA.13	Generally supports intent of the plan change	

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10. Trustpower Limited	Plan change in entirety	Generally supports plan change in principle	operation, maintenance and/or any permitted upgrading of high voltage transmission lines as a permitted activity.
11. Jane Young	<ul style="list-style-type: none"> • Pol HER.2A • Pol HER.2B • Pol.HER.2C • Rule RRA.13 	<p>Submitter asks a number of questions seeking clarification of the approach proposed. Agrees with statement that non-regulatory approach will not in isolation sustainably manage biodiversity. If no full assessment of biodiversity is undertaken, how will Council be assured it is being protected? Significance of the resource cannot be determined unless a full assessment of district is undertaken. Where are effects not involving vegetation clearance or modification addressed? How does the objective best achieve the purpose of the Act? Where are tables 13.5 and 13.8? Supports reduction in permitted area that can be cleared but needs clarification on this rule as well as clarification on selective removal rule.</p>	<p>OBJ HER.2 and Policies HER.2A, B, C - Retain as notified.</p> <p>Rules RRA.13 and COA.6.- Delete reference to energy generation facilities</p> <p>Provide clarification as requested.</p>

