



FS548

Proposed Far North District Plan

Further submissions on behalf of Federated Farmers of New Zealand

8 September 2023



0800
327
646 | **FED
FARM**
.ORG.NZ

FURTHER SUBMISSION

TELEPHONE 0800 327 646 | WEBSITE WWW.FEDFARM.ORG.NZ

To: Far North District Council
5 Memorial Ave (Head Office)
Kaikohe 0405

Private Bag 752
Kaikohe 0440

Via email: pdp@fndc.govt.nz

Further Submissions on: **Proposed Far North District Plan**

Date: 26 July 2023

Further Submissions by: Northland Federated Farmers of New Zealand Inc

Submission by: Northland Federated Farmers of New Zealand

COLIN HANNAH

NORTHLAND PROVINCIAL PRESIDENT

Federated Farmers of New Zealand

M 027 226 5585

E jcookmunro@fedfarm.org.nz

Address for service:

JO-ANNE COOK MUNRO

SENIOR POLICY ADVISOR / RESOURCE MANAGEMENT SOLICITOR

Federated Farmers of New Zealand (Inc)

M 027 331 0084

E jcookmunro@fedfarms.org.nz

1. INTRODUCTION

- 1.1 Federated Farmers welcomes the opportunity to provide further submissions on the Proposed Far North District Plan.
- 1.2 Federated Farmers of New Zealand (Inc) (**Federated Farmers**) has an interest in the Proposed Far North District Plan that is greater than the interest the general public has.
- 1.3 Federated Farmers is a primary sector organisation with a long and proud history of representing the needs and interests of New Zealand farmers involved in a range of rural businesses. We are a pan sector organisation that works with farmers to ensure practical and workable outcomes.
- 1.4 In Northland, Federated Farmers has a membership base of over 500 members who are involved in a wide range of land use activities in Northland including dairy, dry stock, arable, horticulture and lifestyle. We also represent rural communities and our rural contractors and rural butchers who are also a part of the Federated Farmers as members.

- 1.5 Federated Farmers aims to add value to its members' farming businesses. Its key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:
- (a) our members may operate their business in a fair and flexible commercial environment;
 - (b) our members' families and their staff have access to services essential to the needs of the rural community; and
 - (c) our members adopt responsible management and environmental practices.
- 1.6 Federated Farmers made submissions on the Proposed Far North District Plan and has been assigned the submitter number S420 as shown on p41 of the summary of submissions document¹ on the Council's website.
- 1.7 Section 2 contains the table that sets out Federated Farmers' further submissions in respect of submission points made by other parties on the Proposed Far North District Plan. The table also indicates whether Federated Farmers supports or opposes these primary submissions, the reasons for the position that it has taken, and the relief sought.
- 1.8 Federated Farmers wishes to be heard in support of these further submissions.
- 1.9 If others are making a similar submission, Federated Farmers will consider presenting a joint case with them at the hearing.
- 1.10 Federated Farmers could not gain an advantage in trade competition through these further submissions.
- 1.11 Federated Farmers seeks any consequential changes necessary to give effect to the relief sought in each of the individual submission points made
- 1.12 Federated Farmers can confirm that copies of this further submission have been served on the parties who made the original submission.

¹ Far North District Council, *Proposed District Plan - List of Submitters and Contact Details*, August 2023.

2. FURTHER SUBMISSIONS TO THE PROPOSED FAR NORTH DISTRICT PLAN

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Martin Yuretich	S40.001	Subdivision	The submitter opposes rule SUB-S1 which deals with minimum lot sizes for subdivision in the rural production zone. The rule will severely restrict the ability to create small rural lots in the rural production zone and will no longer allow farmers to retire in their existing homes with a small area of land. The rule will reduce the ability for rural landowners to provide small blocks for young family members to build on and enter the property market; and will reduce the capacity for farmers to decrease their debt burdens by subdividing off small blocks of land that do not significantly add to the productivity of their farm.	Support	Federated Farmers supports the relief sought. The issues raised by the submitter are major issues faced by our farming members and heavily influence how they operate their farms.	Support the relief sought. 548.001
Joel Vieviorka	S41.001	Subdivision	The submitter opposes rule SUB-S1 which deals with minimum lot sizes for subdivision in the rural production zone. The rule will severely restrict the ability to create small rural lots in the rural production zone and will no longer allow farmers to retire in their existing homes with a small area of land. The rule will reduce the ability for rural landowners to provide small blocks for young family members to build on and enter the property market; and will reduce the capacity for farmers to decrease their debt burdens by subdividing off small blocks of land that do not significantly add to the productivity of their farm.	Support	Federated Farmers supports the relief sought. The issues raised by the submitter are major issues faced by our farming members and heavily influence how they operate their farms.	Support the relief sought. 548.002
Paul O'Connor	S47.001 S47.002	Subdivision	The submitter opposes rule SUB-S1 which deals with minimum lot sizes for subdivision in the rural production zone. The rule will	Support	Federated Farmers supports the relief sought. The issues raised by the submitter are	Support the relief sought.

² Submitter Number assigned to original submission.

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
	S47.003		severely restrict the ability to create small rural lots in the rural production zone and will no longer allow farmers to retire in their existing homes with a small area of land. The rule will reduce the ability for rural landowners to provide small blocks for young family members to build on and enter the property market; and will reduce the capacity for farmers to decrease their debt burdens by subdividing off small blocks of land that do not significantly add to the productivity of their farm.		major issues faced by our farming members and heavily influence how they operate their farms.	548.003 548.004 548.005
New Zealand Pork Board New Zealand Pork	S55.001	Definitions	The submitter seeks the addition of a definition of Ancillary Rural Earthworks to include provisions for biosecurity related activity as a permitted activity.	Support	Federated Farmers sought the inclusion of a definition for ancillary rural activities in its submission on the Proposed District Plan.	Grant the relief sought. 548.006
New Zealand Pork Board New Zealand Pork	S55.003	Definitions	The submitter seeks that intensive indoor primary production is included in the definition for farming and not be excluded as it has been proposed.	Support	The definition of farming needs to include all legitimate farming activities.	Grant the relief sought. 548.007
New Zealand Pork Board New Zealand Pork	S55.005	Definitions	The submitter seeks the inclusion of a definition for farm workers' accommodation.	Support	Federated Farmers agrees with the submitter that farm workers' accommodation has different requirements to those required for minor residential accommodation.	Grant the relief sought. 548.008
New Zealand Pork Board New Zealand Pork	S55.010	Definitions	The submitter seeks the inclusion of a definition for reverse sensitivity.	Support	Reverse sensitivity effects are significant reason for lawfully established intensive primary production activities being restricted. Federated Farmers agrees that the Proposed District Plan should have a specific definition and associated rule structure to	Grant the relief sought. 548.009

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
					manage reverse sensitivity effects to enable the continued effective operation of primary production activities in the rural environment of the district.	
New Zealand Pork Board New Zealand Pork	S55.015	Subdivision	The submitter supports the inclusion of objective SUB-O2 to avoid reverse sensitivity issues that would prevent or adversely affect activities already established on land from continuing to operate.	Support	Federated Farmers' submission sought the retention of this objective as notified along with the expansion of the framework to address reverse sensitivity issues in the rural environment.	Grant the relief sought. 548.011
New Zealand Pork Board New Zealand Pork	S55.017	Subdivision	The submitter requested the inclusion of the potential for reverse sensitivity effects on lawfully established operations in the matters for consideration in policy SUB-011.	Support	Federated Farmers' supports the inclusion of reverse sensitivity issues in the rural environment as a matter of consideration in SUB-011.	Grant the relief sought. 548.0112
New Zealand Pork Board New Zealand Pork	S55.018 S55.019 S55.020	Subdivision	The submitter sought the amendment of rules SUB-R1, SUB-R2 and SUB-R3 to refer to reverse sensitivity effects.	Support	Federated Farmers' supports the inclusion of reverse sensitivity issues in these rules.	Grant the relief sought. 548.013 548.014
Michael Winch	S67.003	Ecosystems and indigenous biodiversity	Submitter seeks several amendments to rule IB-R1 and PER-1 to remove the ability to remove dead trees and indigenous vegetation.	Oppose	The amendments sought would severely impede the ability of landowners to utilise their land effectively and efficiently. The ability to remove dead trees and indigenous vegetation where it is necessary to do so must be retained in the Proposed District Plan.	548.015 Decline the relief sought. 548.016
Michael Winch	S67.010	Rural production zone	The submitter seeks the reduction of the permitted threshold for impermeable surfaces in the rural production zone from 15% to 5%	Oppose	The amendment sought is impractical and would create issues for everyday farming activities needing to obtain resource consent for exceeding	Decline the relief sought

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
					the much smaller threshold that has been sought.	548.017
PF Olsen Limited New Zealand	S91.003	Definitions	The submitter seeks that the definition of Highly Productive Land is consistent with the definition contained in the National Policy Statement for Highly Productive Land.	Support	Federated Farmers supports the inclusion of a definition for highly productive land. It is important that the definition in the District Plan captures all of the soils intended under the definition in the National Policy Statement for Highly Productive Land.	Grant the relief sought 548.018
PF Olsen Limited New Zealand	S91.008	Ecosystems and indigenous biodiversity	The submitter seeks the deletion of Rule IB-R4 or an amendment to not require consent holders to obtain an ecologist's report to prove that the indigenous vegetation is not a Significant Natural Area. Potential Significant Natural Areas should be ground truthed in conjunction with appropriate consultation with affected landowners and land managers to introduce the agreed and mapped SNAs into the plan by way of plan change.	Support	Federated Farmers is of the view is that it is inappropriate to place the burden of proving that vegetation outside of an identified Significant Natural Area does not meet the relevant criteria on the landowner. Council has obligations under the relevant resource management legislation to have done this.	Grant the relief sought 548.019
PF Olsen Limited New Zealand	S91.010	Natural features and landscapes	The submitter believes that Policy NFL-P4 is an unacceptable form of grandparenting existing land use, favouring one form of primary production over others. It seeks the amendment of the policy to apply to all primary production activities which includes mining, quarrying and forestry.	Oppose	Federated Farmers supports the policy as notified. It is appropriate that some primary production activities are not allowed to occur within an outstanding natural feature or landscape given the potential for these activities to have a great impact on the environment.	Decline the relief sought 548.020
PF Olsen Limited New Zealand	S91.020	Rural Production Zone	The submitter seeks the retention of clauses a. and b. of objective RPROZ-O3 and the amendment of clause c. to apply to all primary production activities.	Oppose	Federated Farmers opposed objective RPZOZ-O3 as notified. The objective does not meet the requirements of the	Decline the relief sought

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
					National Policy Statement for Highly Productive Land as it does not provide for the ongoing operation of existing activities.	548.021
Lynley Newport	S96.001	Natural Features and Landscapes	The submitter seeks the deletion of Rule NFL-R6 and believes that not only are the activity classes are unacceptable, unreasonable and unjustified but the rule is inconsistent with NFL-P4 which provides for farming.	Support	Federated Farmers opposed Rule NFL-R6 in its submission and sought its deletion. It is unwarranted for the Council to require farmers to gain a resource consent if they are farming within an outstanding natural landscape or feature that is located outside of the coastal environment.	Grant the relief sought 548.022
Lynley Newport	S101.001	Subdivision	The submitter sought the amendment of objective SUB-O1 so that the phrase 'does not significantly increase' is inserted in clauses (c) and (d) related to reverse sensitivity and land use respectively.	Oppose	Federated Farmers submission supported objective SUB-O1 as it was notified. The watering down of the objective as proposed will allow for increase reverse sensitivity and inconsistent land use practices to occur as it is debated what is meant by "does not significantly increase".	Decline the relief sought. 548.023
Lynley Newport	S102.001	Rural Production Zone	The submitter seeks the amendment of objective RPROZ-O2 so that it requires the rural production zone to be 'primarily' used for the activities listed.	Oppose	Federated Farmers submission supported the objective as it was notified. The amendment sought is inconsistent with the National Policy Statement for Highly Productive Land and does not recognise the importance of ensuring rural activities can continue in the rural zone.	Decline the relief sought. 548.024

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Lynley Newport	S103.001 S103.002 S103.003	Rural Production Zone	The submitter seeks the amendment of the policies for the rural production zone to allow non-rural activities to occur.	Oppose	The amendments sought are not supported. Productive land in the rural production zone is a finite resource which must be managed in a way to ensure its ongoing productive capacity. The amendments sought are inconsistent with the National Policy Statement for Highly Productive Land.	Decline the relief sought. 548.025 548.026 548.028
Lynley Newport	S128.001	Ecosystems and indigenous biodiversity	The submitter seeks an amendment to policy IB-P1 by adding a new clause (f) that requires an assessment of the ecological significance of indigenous vegetation when subdividing pursuant to Rules SUB-R6 or SUB-R7.	Oppose	The amendment sought by the submitter is onerous and costly.	Decline the relief sought. 548.029
Trevor Ashford	S146.001	Subdivision	The submitter opposes rule SUB-S1 which deals with minimum lot sizes for subdivision in the rural production zone. The rule will no longer allow farmers to retire in their existing homes with a small area of land; will reduce the ability for rural landowners to provide small blocks for young family members to build on and enter the property market; and will reduce the capacity for farmers to decrease their debt burdens by subdividing off small blocks of land that do not significantly add to the productivity of their farm.	Support	Federated Farmers supports the relief sought. The issues raised by the submitter are major issues faced by our farming members and heavily influence how they operate their farms.	Support the relief sought. 548.030
Horticulture New Zealand	S159.001	Definitions	The submitter seeks the addition of a definition for Ancillary Rural Earthworks.	Support	Federated Farmers sought the inclusion of a definition for ancillary rural activities in its submission on the Proposed District Plan.	Grant the relief sought being the inclusion of a definition in the Proposed District Plan for ancillary rural earthworks.

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Horticulture New Zealand	S159.002	Definitions	Submitter seeks the inclusion of a definition for seasonal workers accommodation.	Support	The submitter is right when they state that seasonal workers accommodation is different to visitors' accommodation.	Grant the relief sought. 548.035 548.036
Horticulture New Zealand	S159.003	Definitions	The submitter seeks the inclusion of a definition for agricultural aviation movements.	Support	It is appropriate that there is a definition for agricultural aviation movements in the Proposed District Plan.	Grant the relief sought. 548.037
Horticulture New Zealand	S159.007	Definitions	Submitter seeks the inclusion of a definition for reverse sensitivity.	Support	Reverse sensitivity is a significant issue for rural activities. It is essential that there is an appropriate definition for reverse sensitivity included in the Proposed District Plan.	Grant the relief sought. 548.038
Horticulture New Zealand	S159.010	Definitions	Submitter seeks the amendment of the definition for farming so that it refers to rural production activities.	Support	The current definition implies pastoral land which is not always the case for rural activities.	Grant the relief sought. 548.039
Horticulture New Zealand	S159.016	Definitions	The submitter seeks the amendment of the definition of the national grid yard so that the setback differs for poles and towers.	Support	The submitter seeks similar relief to that of Federated Farmers. It is important to ensure that the differentiation for setbacks is made to allow landowners to use their land effectively and efficiently.	Grant the relief sought. 548.040
Horticulture New Zealand	S159.29	Strategic Direction	The submitter seeks the amendment of strategic direction SD-RE-O! to provide for primary production and ensure that it is not compromised by incompatible activities.	Support	The amendment sought is appropriate as it is not sufficient to just recognise a matter. Council also needs to provide for that matter and ensure that it continue to occur.	Grant the relief sought. 548.041
Horticulture New Zealand	S159.031	Infrastructure	The submitter seeks the amendment of Objective I-O3 Policy I-P7 to remove the	Support	Federated Farmers agrees with the submitter that the relevant	Grant the relief sought.

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
	S159.032		protection that has been given to infrastructure in these provisions.		higher order planning documents do not require the protection of infrastructure. The provisions in the Proposed District Plan need to be consistent with these higher order documents.	548.042 548.043
Horticulture New Zealand	S159.038	Infrastructure	The submitter seeks the amendment of Rule I-R21 which has classified the reticulation and storage of water for irrigation purposes within the National Grid Yard a non-complying activity.	Support	The submitter is corrected when it states that the issue is ensuring access to the National Grid Yard is not impeded. It is access that should be focused on rather than unnecessary limiting activities with little or no effects on that access.	Grant the relief sought. 548.044
Horticulture New Zealand	S159.039	Renewable electricity generation	The submitter seeks the amendment of Policy REG-P9 so that large scale renewable electricity generation activities cannot locate on highly productive land.	Support	Highly productive land is a limited resource and needs to be recognised and provided for. The Proposed District Plan also needs to be consistent with the National Policy Statement for Highly Productive Land.	Grant the relief sought. 548.045
Horticulture New Zealand	S159.045 S159.046 S159.047	Heritage and Cultural Values	The submitter seeks the amendment of the Kerikeri, Pouerua and Te Waimate Heritage overlays as they include rural production land and existing rural production activities should be able to continue while the integrity of the overlay is maintained.	Support	It is important that existing, legally established activities are recognised and provided for so that they can continue.	Grant the relief sought. 548.046 548.047 548.048
Horticulture New Zealand	S159.049 S159.050	Heritage and Cultural Values	The submitter seeks the inclusion of a new rule that provides for rural production activities as a permitted activity in the heritage and sites and areas of significance to Māori overlays.	Support	Refer to reason provided directly above.	Grant relief sought. 548.049 548.050

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Horticulture New Zealand	S159.070	Subdivision	The submitter seeks the amendment of the activity status in SUB-R3 from controlled to restricted discretionary.	Oppose	The amendment sought will capture farmers looking to subdivide their land for the purposes of freeing up capital or providing for a family member. It is not considered that it is necessary for all subdivisions in the rural production zone to be notified. Notification should be based the effects from an activity.	Decline the relief sought. 548.051
Horticulture New Zealand	S159.075 S159.076	Coastal Environment	The submitter seeks the amendment of Rules CE-R2 'Repair or maintenance' and CE-R3 'Earthworks' to provide for structures ancillary to farming activities and ancillary rural earthworks respectively as permitted activities.	Support	The amendment sought will enable rural production activities to continue to occur without placing unnecessary barriers in front of them.	Grant the relief sought. 548.052 548.053
Horticulture New Zealand	S159.077	Coastal Environment	Submitter seeks the amendment of Rule CE-R4, PER-1 to provide for existing use rights for lawfully established farming activities.	Support	Federated Farmers submitted on this rule and sought that existing, lawfully established farming activities were provided for permitted activities within high or outstanding natural character areas in the coastal areas. For Council not to do so will place huge impediments in front of farmers to be able to continue their operations.	Grant the relief sought. 548.054
Horticulture New Zealand	S159.079	Earthworks	Submitter seeks the inclusion of a new permitted activity rule for ancillary rural earthworks in standard EW-S1.	Support	Ancillary rural earthworks include everyday farming activities which need to be provided for with as few impediments as possible.	Grant the relief sought. 548.055
Horticulture New Zealand	S159.129	Rural Production Zone	The submitter seeks the inclusion of a permitted activity rule for seasonal worker accommodation.	Support	Federated Farmers supports the inclusion of a permitted activity for seasonable worker	Grant the relief sought. 548.056

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
					accommodation. Seasonal workers are a critical component of rural production activities.	
Bentzen Farm Limited	S167.005	Strategic Direction	The submitter seeks the recognition of the importance of non-primary production activities in the rural environment to the social, economic and cultural wellbeing of the district is recognized and provided for.	Oppose	Federated Farmers opposes the inclusion of a new strategic direction for the rural environment as sought by the submitter. Rural production activities have no option but to locate in the rural environment where other activities do have the ability to locate elsewhere.	Decline the relief sought. 548.057
Bentzen Farm Limited	S167.015	Ecosystems and indigenous biodiversity	Submitter seeks the deletion of policy IB-P1.	Oppose	Federated Farmers supported the policy and the inclusion of the proposed schedule in the Proposed District Plan.	Decline the relief sought. 548.058
Bentzen Farm Limited	S167.070	Coastal Environment	The submitter seeks amendment of policy CE-P6 to enable farming activities within the coastal environment.	Support	Existing, lawfully established activities should be able to continue within the coastal environment as long as they do not increase any potential adverse effects on that environment.	Grant the relief sought. 548.059
Thirty Six Limited	S168.012	Strategic Direction	The submitter seeks the recognition of the importance of non-primary production activities in the rural environment to the social, economic and cultural wellbeing of the district is recognized and provided for.	Oppose	Federated Farmers opposes the inclusion of a new strategic direction for the rural environment as sought by the submitter. Rural production activities have no option but to locate in the rural environment where other activities do have the ability to locate elsewhere.	Decline the relief sought. 548.061
Thirty Six Limited	S168.022	Ecosystems and indigenous biodiversity	Submitter seeks the deletion of policy IB-P1.	Oppose	Federated Farmers supported the policy and the inclusion of	Decline the relief sought.

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
					the proposed schedule in the Proposed District Plan.	548.062
Thirty Six Limited	S168.031	Ecosystems and indigenous biodiversity	The submitter seeks that the IB-R4 rule be deleted. It states that the requirement in PER-1 lacks precision necessary for a permitted activity and imposes an unfair cost and burden on landowners to identify SNA areas. The rule is unfairly structured such that the area are assumed SNA unless proven otherwise by landowners and as such does not satisfy the requirements of section 32 of the RMA 1991.	Oppose	Federated Farmers is of the view that it is inappropriate to place the burden of proving that vegetation outside of an identified Significant Natural Area does not meet the relevant criteria on the landowner. Council has obligations under the relevant resource management legislation to have done this with sufficient accuracy.	548.063
Thomson Survey Limited	S197.001	Rural Production Zone	The submitter seeks the amendment of objective RPROZ-02 as he believes it is overly restrictive.	Oppose	The purpose of the rural production zone is to allow for rural production activities to continue and provide for similar activities to be established. It is not appropriate to loosen up the objective purely based on the fact that there are already other non-rural production uses in the zone.	Decline the relief sought. 548.064
Thomson Survey Limited	S199.001 S199.002 S199.003	Rural Production Zone	The submitter disagrees with the wording of the policies for the zone which are focused on rural production. Amendments are sought to loosen up the controls on the zone to allow other non-rural production activities to occur in the zone.	Oppose	Rural production activities have limited resource on which they can be established. To provide for other unnecessary activities to establish in the zone is inappropriate and will be detrimental to existing, lawfully established activities on the zone.	Decline the relief sought. 548.065 548.066 548.067
Denis Thomson	S201.001	Subdivision	The submitter sought the amendment of objective SUB-O1 so that the phrase 'does not significantly increase' is inserted in	Oppose	Federated Farmers submission supported objective SUB-O1 as it was notified. The watering	Decline the relief sought.

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
			clauses (c) and (d) related to reverse sensitivity and land use respectively.		down of the objective as proposed will allow for increase reverse sensitivity and inconsistent land use practices to occur as it is debated what is meant by “does not significantly increase”.	548.068
Nicole Wooster	S259.001	Rural Production Zone	The submitter seeks that the rural production zone provides for farming / horticulture activities and protect them from inappropriate lifestyle, residential, commercial and industrial activities.	Support	Federated Farmers supports this submission as rural production activities cannot be picked up and moved to other sites	Grant the relief sought. 548.069
Ministry of Education	S331.07	New Provision	The submitter seeks that educational facilities are provided for in all zones as a permitted activity. It has also proposed that six zones including the light and heavy industrial zones are exempted from the new provision.	Oppose	The placement of a sensitive activity in a rural production zone needs to be clearly thought out. The new provision sought by the submitter may have unintended consequences on existing, lawfully established rural production activities.	Decline the relief sought. 548.070
Ministry of Education	S331.065 S331.066 S331.068	Rural Production Zone	The submitter seeks the amendment of objective RPROZ-O2 and policy RPROZ-P2 to provide for educational facilities in the zone. The Ministry also seeks the deletion of rule RPROZ-O6 as it will not be required if the new provision it has sought is included in the Proposed District Plan.	Oppose	Federated Farmers supports the development and maintenance of vibrant rural communities. However, sensitive activities such as educational facilities need to be carefully considered to ensure that they do not impact on existing, lawfully established rural activities. Rural activities are not able to be packaged up and moved elsewhere to deal with any negative effects from other activities.	Decline the relief sought. 548.071 548.072 548.073

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Department of Conservation	S364.055	Subdivision	The submitter considers the word “significant” should be removed from RDIS-2 of proposed rule SUB-R6. T	Oppose	The removal of the word will make the rule onerous and costly to comply with if it is required to retain an ecologist to assess every area of indigenous vegetation whether it is significant or not.	Decline the relief sought. 548.113
Department of Conservation	S364.056 S364.057 S364.058	Subdivision	<p>The submitter seeks the amendment of rule SUB-R17 to refer to qualifying significant natural areas as well as scheduled.</p> <p>More stringent controls to allow for the consideration and scheduling of significant natural areas in the subdivision chapter is also sought.</p> <p>The submitter seeks the review of the rules for restricted discretionary and non-complying activities and the addition of matters of discretion and control for indigenous biodiversity where not already identified.</p> <p>The submitter would prefer that all sites that meet the criteria for significant natural areas are included in Schedule 4 of the Proposed District Plan.</p>	Oppose	The relief sought will not add clarity to the Proposed District Plan and will make the subdivision overtly onerous and difficult.	Decline the relief sought. 548.114 548.115 548.116
Department of Conservation	S364.063 S364.064 S364.066 S364.067 S364.068	Coastal Environment	Submitter seeks the deletion of the reference to the characteristics and qualities of the coastal environment and asks that only the coastal environment is referred to in policies CE-P2, CE-P3, CE-P5, CE-P6 and CE-P8.	Oppose	The amendments sought do not provide clarity to the policy and exactly what is meant to be focused on.	Decline the relief sought. 548.117 548.118 548.119
Department of Conservation	S364.069	Coastal Environment	Submitter seeks the deletion of the reference to the characteristics and qualities of the outstanding natural character areas	Oppose	The amendments sought do not provide clarity to the policy and exactly what is meant to be focused on.	Decline the relief sought. 548.122

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
			and asks that only the coastal environment is referred to in policy CE-P9.			
Heritage New Zealand Pouhere Taonga	S409.021	Historic Heritage	The submitter seeks the addition of a new policy requiring the blanket protection of dry-stone walls of historical, cultural and amenity value to the community.	Oppose	Federated Farmers understands the need for the preservation of historic heritage. The blanket protection of historic heritage is inappropriate as it will be overly restrictive on existing, lawfully established activities such as farming.	Decline the relief sought. 548.124
Heritage New Zealand Pouhere Taonga	S409.028	Historic Heritage	The submitter seeks the amendment of rule HH-R5 which provides controls for earthworks outside of Heritage Area Overlays. One of the amendments is the introduction of a 100m ³ volume limit on earthworks.	Oppose	Federated Farmers lodged a submission in support of the rule as it was notified. The introduction of a volume limit is not supported and is seen as unnecessary and restrictive.	Decline the relief sought. 548.125
KiwiRail	S416.040	Noise	The submitter seeks the inclusion of a new noise standard for controls requiring acoustic insulation and ventilation to be installed in new or altered sensitive uses within 100m of the railway corridor. The amendments sought contain specific materials to be used in certain situations.	Oppose	The proposed controls are overly restrictive and impose additional costs which may not be able to met by our members at a time of economic downturn and a cost-of-living crisis.	Decline the relief sought. 548.126
Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust	S425.053 S425.053 S425.054 S425.055	Rural Production Zone	The submitter seeks the amendment of rule RPROZ-R4 to require an accessway to be set back more than 20 metres for any residential unit or minor residential unit on any site that shares the access.	Oppose	The setback sought is unnecessary and not realistic. It should be expected that there will be noise and potentially dust in the rural environment. It should be up to the providers of visitors' accommodation to ensure their facilities are able to cope with the elements that make up the rural environment.	Decline the relief sought. 548.127 548.128

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust	S425.064	Rural Production Zone	The submitter seeks that the activity classification for campgrounds in the rural production zone is changed from a discretionary activity to a permitted ac	Oppose	It is not considered that it is appropriate for campgrounds to be a permitted activity in the rural production zone. Campgrounds are a sensitive activity as defined in the Proposed District Plan and have the potential to create reverse sensitivity effects for existing, lawfully established activities.	Decline the relief sought. 548.129
Transpower	S454.031	Strategic Direction	The submitter seeks the amendment of strategic direction SD-RE-02 so that it excludes infrastructure that has a functional or operational need to be located in the rural environment.	Oppose	It is appropriate that the strategic direction for the rural environment is focused on the Protection of highly productive land from inappropriate development. The amendment sought is not necessary as the development of the National Grid infrastructure would not be considered to be inappropriate development.	Decline the relief sought. 548.130
Transpower	S454.043 S454.044	Infrastructure	Submitter seeks the amendment of policy I-P2 so that the National Grid is excluded from having to meet the requirements listed. The submitter has also sought the inclusion of a new policy which provides for the development of the National Grid.	Oppose	As the operator of the National Grid, the submitter is required to meet its obligations under the Resource Management Act 1991. These obligations are not negated by the National Policy Statement on Electricity Transmission.	Decline the relief sought. 548.131 548.132
Transpower	S454.065	Infrastructure	The submitter seeks the amendment of rule I-R11 which sets out the controls for new building or structures, and extensions to existing buildings or structures, in the National Grid Yard.	Oppose	Federated Farmers submission sought an amendment to the rule to remove the non-complying activity status and replace it with a restricted discretionary activity status. While some of the proposed	Decline the relief sought. 548.133

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
					amendments sought are supported, some amendments are overly restrictive and would prove problematic for farmers to continue to carry out their everyday farming operations.	
Transpower	S454.108	Rural Production Zone	Submitter seeks the amendment of objective RPROZ-02 to include infrastructure as an activity that has a functional and operational need to be located in the rural production zone.	Oppose	The amendment sought is unnecessary as infrastructure is already located in the zone and can be assumed to be a compatible activity.	Decline the relief sought. 548.134
Transpower	S454.109	Rural Production Zone	The submitter seeks the inclusion of a new policy that makes it explicit that infrastructure such as the National Grid is provided for in the rural production zone.	Oppose	The amendment sought is not necessary as infrastructure has already been provided for in the policies for the zone.	Decline the relief sought. 548.135
Michael Foy	S472.008 S472.009	Subdivision	Submitter seeks the amendment of Sub-P8 and the deletion of SUB-P9 so that more rural lifestyle blocks are allowed in the rural production zone.	Oppose	Rural production activities can only occur on a limited number of places. Allowing more residential development to occur in the rural production zone does not allow for the protection of highly productive land or for existing, lawfully established activities to continue.	Decline the relief sought. 548.136 548.137
Royal Forest and Bird Protection Society of New Zealand	S511.009	Definitions	The submitter seeks an amendment to the notified definition of 'no net loss'. The submitter believes that the definition should be consistent with the National Policy Statement-Fresh Water and refer to the type of habitat rather than the offset.	Oppose	The submitters proposed definition refers to the ecosystem type and species, this is inconsistent with Appendix 6 – Principles for aquatic offsetting of the National Policy Statement - Fresh Water which refers to the 'impact site'.	Decline the relief sought. 548.138

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Royal Forest and Bird Protection Society of New Zealand	S511.019	Strategic Directions	The submitter seeks to amend the Overview and believes that the notified wording may not allow the plan to give effect to higher order documents.	Oppose	The Strategic Directions chapter specifically state that all other objectives and policies in all other chapters of the District Plan are to be read and achieved in a manner consistent with the Strategic Directions. The submitters suggestion that objectives found in other chapters are subservient to the strategic objective is incorrect. The Strategic Directions provide an overarching direction for the District Plan and allow the plan to give effect to higher order documents.	Decline the relief sought 548.139
Royal Forest and Bird Protection Society of New Zealand	S511.020 S511.021 S511.022 S511.023 S511.024 S511.025	Strategic Directions - Overview of Historic, cultural, Economic, Urban, Infrastructure, electricity, rural environment and natural environment	The submitter seeks the deletion of problematic wording from each of these sections, as it is in the Strategic Directions Overview and considered repetitive.	Oppose	It must be considered that a plan user does not read every section of the plan and some repetition is necessary particularly when describing such vital aspects of the District Plan as Strategic Directions.	Decline the relief sought 548.140 548.141 548.142 548.143 548.144 548.145
Royal Forest and Bird Protection Society of New Zealand	511.026	Strategic Directions - Natural environment	The submitter seeks to amend the overview to include issues specific to indigenous biodiversity.	Oppose	FFNZ believes that the notified version of the Overview contains adequate references to protection and maintenance of Indigenous Biodiversity.	Decline the relief sought. 548.146
Royal Forest and Bird Protection Society of New Zealand	S511.031	Strategic Directions - Natural environment	The submitter seeks the retention of SD-EP-04 as notified.	Oppose	FFNZ opposed SD-EP-O4 as it was notified. The wording of the objective implies the prioritisation of carbon farming over necessary primary activities such as dairy, dry	Decline the relief sought 548.147

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
					stock, cropping and general food production.	
Royal Forest and Bird Protection Society of New Zealand	S511.032	Strategic direction - Natural environment	The submitter seeks to amend SD-EP-O5 to be consistent with the wording in s6(a) of the Resource Management Act 1991 and include waterbodies and their margins in the wording of the objective.	Oppose	The suggested wording is not consistent with s6(a) of the Resource Management Act, which lists wetlands, lakes and rivers not 'waterbodies'.	Decline the relief sought. 548.148
Royal Forest and Bird Protection Society of New Zealand	S511.034	Strategic direction - Natural environment	The submitter seeks to add a new objective so that 'Indigenous Biodiversity is maintained'.	Oppose	SD-EP-O3 already provides for maintenance of Indigenous Biodiversity.	Decline the relief sought. 548.149
Royal Forest and Bird Protection Society of New Zealand	S511.036	Strategic direction - Rural Environment	The submitter seeks to add a new objective to ensure that the establishment and operation of primary production activities are not limited by new incompatible sensitive activities and those other activities in the rural areas are limited.	Support	The amendment sought will help protect existing primary production activities from reverse sensitivity and provide for similar activities to be established.	Grant the relief sought. 548.150
Royal Forest and Bird Protection Society of New Zealand	S511.039	Infrastructure	The submitter seeks to amend objective I-O4 and replace the word minimise with avoid, remedy or mitigate to be more consistent with s5 of the Resource Management Act 1991.	Support in Part	Federated Farmers suggested an amendment to objective I-O4 to include economic values which would also make the wording more consistent with s5 the Resource Management Act 1991.	Grant the relief sought along with the relief sought in Federated Farmers original submission. 548.151
Royal Forest and Bird Protection Society of New Zealand	S511.047	Renewable Electricity Generation	The submitter seeks to amend objective REG-O3 and replace the word minimise with avoid, remedy or mitigate to be more consistent with Section 5 of the Resource Management Act.	Support in Part	Federated Farmers also suggested an amendment to objective REG-O3 to recognise the functional need of renewable electricity generation activities to be located where the renewable source is located to ensure effective and efficient production.	Grant the relief sought along with the relief sought in Federated Farmers original submission. 548.152

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Royal Forest and Bird Protection Society of New Zealand	S511.054	Indigenous Biodiversity	The submitter seeks to amend objective IB-O2 to make it less human centric and use orientated.	Oppose	Federated Farmers believes that the notified version of IB-O2 is appropriate and already encompasses what the submitter is asking for.	Decline the relief sought. 548.153
Royal Forest and Bird Protection Society of New Zealand	S511.057	Indigenous Biodiversity	The submitter seeks to amend policy IB-P1 to reflect district wide mapping and rules applicable to SNAs.	Oppose	Federated Farmers opposes the relief sought as it is unclear exactly what the submitter wants. Federated Farmers supports the recognition of the importance of the role that landowners play in maintaining indigenous biodiversity.	Decline the relief sought. 548.154
Royal Forest and Bird Protection Society of New Zealand	S511.061	Indigenous Biodiversity	The submitter seeks initially the deletion of the policy or if not an amendment to IB-P5(a)	Oppose	The policy as currently notified permits the continuation of existing, lawfully established activities while simultaneously safeguarding Significant Natural Areas and preserving indigenous biodiversity. Federated Farmers contends that this policy effectively strikes an equitable balance between the imperative of protecting and sustaining indigenous biodiversity and the necessity of appropriate land use practices.	Decline the relief sought. 548.155
Royal Forest and Bird Protection Society of New Zealand	S511.064	Indigenous Biodiversity	The submitter seeks an amendment to Policy IB-P9 to restrict the policy to subdivision and development consents rather than as a general provisions applicable to all landowners.	Support in part	The policy as notified would be a particularly onerous requirement for owners of large blocks of native forest. Federated Farmers believes that Policy IB-P9 expands on IB-P7 in a way that contradicts the earlier policy. It places the	Grant the relief sought but include wording to promote a combined approach from landowners and council consistent with IB-P7.

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
					burden of pest management solely on the landowner whereas IB-P7 endorses a collaborative approach from landowners and council.	548.156
Royal Forest and Bird Protection Society of New Zealand	S511.066	Indigenous Biodiversity	The submitter seeks to amend the rules so as not to conflict or be more lenient than the National Environmental Standards – Fresh Water and that under Section 54 of the Standards vegetation clearance is a non-complying activity.	Oppose	The submitter seems to be suggesting that the standards make all vegetation clearance a non-complying activity. Section 54 of the National Environmental Standards – Fresh Water only refers to vegetation clearance as a non-complying activity within, or within a 10 m setback from, a natural inland wetland.	Decline the relief sought. 548.157
Royal Forest and Bird Protection Society of New Zealand	S511.067	Indigenous Biodiversity	The submitter seeks multiple amendments and deletions of clauses within Performance Standard of Rule IB-R1 including: PER-1 (2) - amend so that Dead trees should not be removed from SNAs but may be felled for safety reasons. PER-1 (4) - amend to increase and clarify the scope of the provision. PER-1 (6) - amend from a 20m setback to 10m. PER-1 (7) - delete add a new controlled activity rule for new residential units in SNAs. PER-1 (8) - make PER-1 (8) at least a controlled activity. PER-1 (9) - amend permitted clearance distance from a new fence from 3.5m to 1m.	Oppose	Federated Farmers fully supports the permitted activity status for the removal of dead vegetation. Dead vegetation can present health and safety concerns as well as limit the ability for farmers to carry out day-to-day maintenance and farming operations. The proposed amendments to clearance limits and setbacks are opposed by Federated Farmers. The relief sought by the submitter has the potential to adversely affect the ability of farmers to continue with lawfully established operations including fencing, track maintenance and for health and safety reasons.	Decline the relief sought 548.158

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
			<p>PER-1 (11) - amend to restrict it to the maintenance of firebreaks only.</p> <p>PER-1 (13) - amend to restrict permitted clearance to a maximum distance of no more 1 meter (either side) of the ...</p>		The creation as well as the maintenance of firebreaks needs to remain a permitted activity.	
Royal Forest and Bird Protection Society of New Zealand	S511.068	Indigenous Biodiversity	The submitter seeks to amend the threshold for clearance to 50 square meters every 5 years.	Oppose	Federated Farmers believes that the notified clearance limit of 100m ² per year is an appropriate limit. Federated Farmers considers the relief sought overly restrictive and that the reduced clearance limits would negatively impact on landowners' ability to use the land productively.	<p>Decline the relief sought.</p> <p style="text-align: center;">548.159</p>
Royal Forest and Bird Protection Society of New Zealand	S511.069	Indigenous Biodiversity	<p>The submitter seeks to amend Per-1(2)(l) to limit permitted clearance to 500 square meters every 5 years or restrict it to clearly defined purposes.</p> <p>They also seek to Delete Per-1(2)(i) references to clearance within a remnant forest and amend Per-2(2) to limit clearance of up to 50m² every 5 years.</p> <p>They also seek to delete the PER-2 Discretionary Note from IB-R4.</p>	Oppose	Federated Farmers believes that the notified clearance limits in PER-1 (2)(i) and PER-2(2) are appropriate limits. They achieve a balance between landowners rights to make decisions regarding what they do with their property and protecting areas of indigenous biodiversity.	<p>Decline the relief sought.</p> <p style="text-align: center;">548.160</p>
Royal Forest and Bird Protection Society of New Zealand	S511.071	Natural Character	The submitter seeks to add a new objective to the chapter which provides for changes in the location and extent of natural character areas as a result of the effects of climate change, including inclusion of buffer areas to consider increased flooding and the need for ecosystem retreat as a result of sea level rise.	Oppose	The proposed objective is extremely broad in scope and as written has the potential to capture vast areas of privately owned land with its vague inclusion of buffer areas and ecosystem retreat.	<p>Decline the relief sought.</p> <p style="text-align: center;">548.161</p>

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Royal Forest and Bird Protection Society of New Zealand	S511.075	Natural Character	The submitter seeks an amendment to this rule to give effect to relief sought for NATC-R3 Per-1(1) if NATC-R3 is not amended.	Oppose	The notified version of Rule NATC-R2 allows for appropriate repair and maintenance of lawfully established activities necessary for day-to-day farming operations. NATC-R2 refers to 'lawfully established' activities which implies that the activities are already compliant with all existing Plan rules and any consent requirements	Decline the relief sought 548.162
Royal Forest and Bird Protection Society of New Zealand	S511.076	Natural Character	The submitter believes that PER-1(1) and PER-1(4) are 'too loose' and requests the same relief as for IB-R1(13) and IB-R1(4).	Oppose	It is unclear exactly what the submitter is opposing and in turn what they are requesting in terms of amendments. NATC-R3 expands on what activities are permitted including addressing risks to public health and safety and for biosecurity reasons. Federated Farmers believes that the notified version of the rule is appropriate.	Decline the relief sought. 548.163
Royal Forest and Bird Protection Society of New Zealand	S511.081	Natural Features and Landscapes	The submitter seeks either the deletion of Rule NFL-R3 or an amendment to include conditions that ensure compliance with the IB and earthworks rules.	Oppose	Federated Farmers submitted in partial support of Rule NFL-R3. The notified version of the rule appropriately allows for some permitted earthworks or indigenous vegetation clearance within outstanding natural features or landscapes. Federated Farmers strongly supports the provisions allowing earthworks or vegetation clearance to repair or maintain fences or tracks but	Decline the relief sought. 548.164

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
					would like to see an amendment permitting further farming activities, emergency services works, and works required for access.	
Royal Forest and Bird Protection Society of New Zealand	S511.085	Natural Features and Landscapes	The submitter seeks either the deletion of NFL-S3 or an amendment to include conditions that ensure compliance with the IB and earthworks rules.	Oppose	The notified version of NFL-S3 is clear, easy to understand and does not require amendment or deletion.	Decline the relief sought. 548.165
Royal Forest and Bird Protection Society of New Zealand	S511.086	Subdivision	The submitter seeks to amend the subdivision rules so that any subdivision requires an assessment to identify Significant Natural Areas before it is commenced.	Oppose	Federated Farmers supports the identification and scheduling of Significant Natural Areas as it provides clarity and certainty for landowners and plan users when making decisions about their land. We oppose the proposed amendment because the requirements are vague and lack clarity. Stating that "SNAs are protected" does not specify how they will actually be protected or what the specific requirements for subdivision will be. Requiring "an assessment" before all subdivisions provides no detail on what type of assessment, the criteria, by who, or any standards that would determine the activity status. This amendment introduces substantial uncertainty for those seeking subdivision consent without outlining the precise expectations or requirements.	Decline the relief sought. 548.166

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Royal Forest and Bird Protection Society of New Zealand	S511.087	Subdivision	The submitter seeks an amendment to SUB-R17 to remove the need for a Significant Natural Area to be scheduled for the rule to apply.	Oppose	Plan users rely on scheduling for clarity and certainty when making land use decisions. The proposed amendment will cause confusion and place unnecessary restrictions on land use.	Decline the relief sought. 548.167
Royal Forest and Bird Protection Society of New Zealand	S511.100	Coastal Environment	The submitter seeks to either delete Rule CE-R3 or amend it to include conditions that ensure compliance with the indigenous biodiversity and earthworks rules or make them even more strict.	Support	Federated Farmers supports the deletion of Rule CE-R3 as it contains unnecessary duplication from the zoning, earthworks and indigenous biodiversity chapters which already include provisions to appropriately manage earthworks and vegetation clearance.	Grant the relief seeking deletion of the rule. 548.168
Royal Forest and Bird Protection Society of New Zealand	S511.104	Coastal Environment	The submitter seeks to amend CE-S3 to ensure alignment with any amendments to CE-R3 above to make sure these rules and standards are at least as strict as the IB chapter or even stricter.	Support in part	The deletion of Rule CE-R3 will make CE-S3 unnecessary. If Rule CE-R3 is not deleted Federated Farmers considers the notified version CE-S3 appropriate.	Grant the relief sought if Rule CE-R3 is deleted. 548.169
Royal Forest and Bird Protection Society of New Zealand	S511.120	Rural Production Zone	It is unclear what the submitter is opposing from the submission.	Oppose	The Rural Production Zone is of great interest and importance to our member and Federated Farmers submitted on various provisions within the Rural Production Zone chapter. Given the lack of clarity in what provisions the submitter is addressing we wish to retain scope in the discussion in case the provisions are relevant to us.	Decline the relief sought. 548.170

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Royal Forest and Bird Protection Society of New Zealand	S511.121	Rural Production Zone	It is unclear what the submitter is opposing from the submission.	Oppose	The Rural Production Zone is of great interest and importance to our member and Federated Farmers submitted on various provisions within the Rural Production Zone chapter. Given the lack of clarity in what provisions the submitter is addressing we wish to retain scope in the discussion in case the provisions are relevant to us.	Decline the relief sought. 548.171