

Submission on Notified Proposal for Plan, Change or Variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: Timaru District Council

Name of submitter:

Greg Anderson and James Sutneland
[State full name]

This is a submission on the following proposed plan or on a change proposed to the following plan or on the following proposed variation to a proposed plan or on the following proposed variation to a change to an existing plan) (the 'proposal'):

Timaru District Plan (proposed)
[State the name of proposed or existing plan and (where applicable) change or variation].

I could/could not* gain an advantage in trade competition through this submission.

[*Select one.]

*I am/am nott directly affected by an effect of the subject matter of the submission that—

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

[*Delete or strike through entire paragraph if you could not gain an advantage in trade competition through this submission.]

[†Select one.]

The specific provisions of the proposal that my submission relates to are: [Give details]

Please find attached

My submission is: [Include whether you support or oppose the specific provisions or wish to have them amended; and reasons for your views]

[If your submission relates to a proposed plan prepared or changed using the collaborative planning process, you must indicate the following:

- Where you consider that the proposed plan or change fails to give effect to a consensus position and therefore how it should be modified; or
- In the case that your submission addresses a point on which the collaborative group did not reach a consensus position, how that provision in the plan should be modified.]

Please find attached.

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I seek the following decision from the local authority: *[Give precise details as this is the only part of your submission that will be summarised in the summary of decisions requested]*

Please find attached.
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I wish (or do not wish)† to be heard in support of my submission.

*[*In the case of a submission made on a proposed planning instrument that is subject to a streamlined planning process, you need only indicate whether you wish to be heard if the direction specifies that a hearing will be held.]*
[†Select one.]

***If others make a similar submission, I will consider presenting a joint case with them at a hearing.**

*[*Delete if you would not consider presenting a joint case.]*

It is a possibility
.....

Signature of submitter (or person authorised to sign on behalf of submitter)

[A signature is not required if you make your submission by electronic means]

Date *19/12/22*

Electronic address for service of submitter: *0277 1511111 @ fedfam.org.nz*

Telephone: *027-387-8909*

Postal address (or alternative method of service under s352 of the Act):
60 Temison Street, Dredin Central, Dredin 9010

Contact person: *[name and designation, if applicable]*
James Sutherland.

Note to person making submission

1. If you are making a submission to the Environmental Protection Authority, you should use form 16B. If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.
2. Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
 - It is frivolous or vexatious;
 - It discloses no reasonable or relevant case;
 - It would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
 - It contains offensive language;
 - It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialist knowledge or skill to give expert advice on the matter.



Federated Farmers of New Zealand

Submission on the Proposed Timaru District Plan 2022

15 December 2022



SUBMISSION

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

Form 5

Submission on publicly notified proposal for policy statement or plan Clause 6 of First Schedule, Resource Management Act 1991

To: Timaru District Council
2 King George Street
Private Bag 522
Timaru 7940
Via email: pdp@timdc.govt.nz

Submission on: **Proposed Timaru District Plan 2022**

Date: 15 December 2022

Submission by: South Canterbury Federated Farmers of New Zealand

GREG ANDERSON

SOUTH CANTERBURY PROVINCIAL PRESIDENT

Federated Farmers of New Zealand

E jsutherland@fedfarmers.org.nz

Address for service: **JAMES SUTHERLAND**

GRADUATE POLICY ADVISOR REGIONAL

Federated Farmers of New Zealand

M 027 387 8909

E jsutherland@fedfarmers.org.nz

1. South Canterbury Federated Farmers of New Zealand (Federated Farmers) could not gain an advantage in trade competition for this submission.
2. Please refer to the attached table for the specific provisions of the Proposed District Plan that our submission relates to.
3. Refer to the table attached for the details of Federated Farmers' submission and whether we support or oppose the specific provisions we have submitted on.
4. The decisions sought by Federated Farmers are outlined in the table attached to this submission.
5. We wish to be heard in support of this submission.
6. Federated Farmers seeks any consequential changes necessary to give effect to the relief sought in each of the individual submission points made.

1.0 Introduction

- 1.1 South Canterbury Federated Farmers (**Federated Farmers**) welcomes the opportunity to submit on the Timaru District Council's (**Council**) on its Proposed District Plan (**District Plan**).
- 1.2 Federated Farmers are 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.
- 1.3 In South Canterbury, Federated Farmers has a membership base of over 550 members who are involved in a wide range of land use activities in South Canterbury including largely pastoral farming with dry stock, dominating the alpine areas, and dairy occurring on the flats, horticulture and lifestyle. We also represent rural communities and our rural contractors who are also a part of the Federated Farmers as members.
- 1.3 Federated Farmers aim to add value to its members' farming businesses. Our 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.
- 1.4 Federated Farmers acknowledges any submissions submitted by individual members.
- 1.5 Federated Farmers is actively involved in district plan reviews across New Zealand. Primary production activities from our members make a significant contribution to the economic, social, and cultural well-being of New Zealand.
- 1.6 Our members want district plans that balances environmental, cultural, social, and economic values while ensuring rules are equitable, cost-effective, pragmatic and effects based. They also want district plans that are easy to use and understand; acknowledge and reward the positive effects farming has on conservation; and recognise the importance of collaborating with rural communities to achieve desired environmental outcomes.
- 1.7 A lot of regulation has come at a significant cost to financial and mental health within the primary sector. Many of the costs are unnecessary and place additional pressure on the primary industry. Areas of discussion around climate change, biodiversity, outstanding natural features, and general land use activities need to be carefully considered to ensure that decision making with the consideration of the impacts of Councils decisions economically, socially, and environmentally.

1.8 There is an expectation that Councils, when undertaking a plan review, will adopt a no-frills approach and only target what is necessary to manage and resolve any issues occurring in the district and to meet their responsibilities under the Resource Management Act 1991 (RMA).

2.0 Key Points of discussion

Mapping and layers

2.1 Federated Farmers position on mapping and identifying sites of significance in the district is to ensure that Council makes landowners involved, educated, and knowledgeable of the area of significance to them. It is also important that any restrictions that are placed across the private property is accurate and able to be backed by hard evidence.

Activity status use

2.2 Federated Farmers supports the Council's intention for having many activities able to occur without having an activity classification assigned to them. This recognises that there are activities which can occur without creating adverse effects on the environment and without the need to have controls specified in the District Plan. We also support the use of the permitted activity classification where some control is required.

2.3 Federated Farmers seeks that where a consent status is required, Council uses controlled status rather than restricted discretionary and or discretionary which allows Council the ability to decline. This would assist the Council in future proofing the plan for when the Natural and Built Environment Act comes into force which has indicated the removal of the restricted discretionary activity classification.

2.4 Controlled activities require resource consent but are always granted by the consent authority. The application for a resource consent will be assessed according to specified matters over which the Council will exercise its control. Controlled activity consents give certainty to users that the resource consent will be granted provided certain conditions are met. This is appropriate for activities that will have no more than minor effects on the environment and where the non-compliance with the permitted activities rules is minor. We would not support Council moving from permitted activity to restricted discretionary and discretionary activity status without the allowance for a controlled activity.

2.5 Federated Farmers seeks that the rules in the District Plan:

- (a) are written clearly and concisely;
- (b) have conditions that are able to be complied with and are enforceable;
- (c) are consistent with objectives and policies contained in the District Plan;
- (d) avoid the reservation of the council's discretion where it is not required or appropriate;
- (e) are consistent with the rules of other authorities such as the National Grid provider;
- (f) are consistent with the national direction set through National Environmental Standards and National Policy Statements; and
- (g) minimise the use of prohibited activity status which place unwarranted barriers for resource consent applicants.

2.7 It is important to remember that the resource consent process can be costly and result in significant time delays. The more restrictive activity classifications should only be imposed where there is evidence to support that there is a need for the Council to have reserved it discretion over several matters which need to be met.

2.8 In respect of our submissions, our suggested amendments are shown with ~~strikeout~~ for deletions and underlining for additional wording. In each of the individual submission points made, the decision sought includes any consequential amendments that may be required to any and all other related elements in the proposed plan.

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
General				
Whole of Plan	1	Support in part	Federated Farmers seeks that the District Plan contains a resource management policy framework that enables primary production in rural areas to occur as existing uses where it is already established and with as few barriers where it is sought to establish new primary production activities.	Federated Farmers seeks the following relief: <ul style="list-style-type: none"> (a) That the district plan includes a <u>clear pathway</u> for existing primary production activities to continue in the rural zones of the Timaru district; and (b) any consequential amendments required as a result of the relief sought.
Part One – Introduction and General Provisions				
Part 1 – Introduction and General Provisions – Description of the plan – Rural Areas	2	Support	Federated Farmers generally supports this chapter of the proposed district plan.	Federated Farmers seeks the following relief: <ul style="list-style-type: none"> (a) the retention of the rural areas chapter as currently written or with wording of similar intent; and (b) any consequential amendments required as a result of the relief sought.
Part 1 – Introduction and General Provisions – Interpretation – Definition – Accessway / Access way	3	Support	Federated Farmers supports the inclusion of a definition for ‘Accessway / Access way’.	Federated Farmers seeks the following relief. <ul style="list-style-type: none"> (a) retention of the proposed definition for ‘Accessway / Access Way’ or amended wording that has the same intent. (b) Any consequential amendments required as a result of the relief sought.
Part 1 – Introduction and General Provisions – Interpretation – Definition	4	Support in part	Federated Farmers supports the inclusion of definitions for ‘Amenity Planting’ in the proposed District Plan. The definition are clear, concise, and easy to understand. It would be appropriate to add further to the definition that appropriately includes farms as actively amenity planting within the definition.	Federated Farmers seeks the following relief: <ul style="list-style-type: none"> (a) the inclusion of a definition for ‘Amenity Planting’ as outlined below or with similar wording: <ul style="list-style-type: none"> • <u>‘Amenity Planting’</u> <ul style="list-style-type: none"> • means any vegetation and/or trees planted in the immediate vicinity of a residential unit, or rural residential development, to provide

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Amenity Planting				<p><i>aesthetic appeal, shelter or domestic food supply. Amenity planting includes any woodlot, orchard or vineyard (to a maximum combined area of 1ha) planted within 100m of a residential unit or rural residential development.</i></p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 1 – Introduction and General Provisions – Interpretations - Definitions – Ancillary Rural Earthworks	5	Support	<p>Federated Farmers seeks the inclusion of a definition for ‘Ancillary Rural Earthworks’ into the district plan.</p> <p>Off-stream farm water storage dams for stock and domestic water storage are commonplace on many farms. Farm quarries are also part of normal day to day farming operation. Activities such as these which support the main existing land use of farming and primary production should not have to apply for resource consent.</p> <p>Other district plans have made allowance for permitted farm quarries at a scale which is appropriate in the context of the wide-open spaces of the rural environment.</p> <p>The definition should encompass the activities listed below along with any related definitions that are required.</p> <ul style="list-style-type: none"> • The tilling or cultivation of soil for the establishment and maintenance of crops and pasture, • Harvesting of crops, • The planting and removal of trees.(e.g Pest species (willows), and riparian planting), • Horticultural root ripping, • The digging of offal pits, • Burying dead stock and plant waste, • Digging post holes and drilling bores, 	<p>Federated Farmers seeks the following relief:</p> <p>(a) the inclusion of a definition for ‘Ancillary Rural Earthworks’ as outlined below or with similar wording:</p> <p><u>ANCILLARY RURAL EARTHWORKS means</u></p> <ul style="list-style-type: none"> • <u>any earthworks or disturbance of soil associated with cultivation, land preparation (including the establishment of sediment and erosion control measures), for planting and growing operations of crops and pasture;</u> • <u>the harvesting of agricultural and horticultural crops (farming) and forests (forestry); and planting trees, removing trees and horticultural root ripping;</u> • <u>the maintenance and construction of facilities typically associated with farming and forestry activities. This includes (but is not limited to): farm/forestry tracks, roads, vehicle manoeuvring areas and landings, stock marshalling yards, stock races, silage pits, offal pits, farm effluent ponds, feeding pads, digging post holes, fencing and sediment control measures, drilling bores, the installation and maintenance of services such as water pipes and troughs, off-stream farm water storage dams, hard stand areas for stock, fertiliser storage pads, airstrips and helipads; and</u>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
			<ul style="list-style-type: none"> Installing and maintaining services such as water pipes and troughs, Farm quarries where excavated material is not removed from the farm site. 	<ul style="list-style-type: none"> <u>farm quarries where quarry winnings are only used within the farm quarry;</u> and <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 1 – Introduction and General Provisions – Interpretations - Definitions – Clearance of Indigenous Vegetation	6	Oppose in part	<p>Federated Farmers opposes in part the definition of ‘Clearance of Indigenous Vegetation’. This definition has been slightly taken out of context from the ‘<i>National Policy Statement for Improved Pastures</i>’. This partial use of the definition can create confusion among farmers. It is helpful if the definition does cover the needs for the farm systems in the district, whilst also tying into the national requirements and regulation.</p> <p>We urge the council to propose another definition or remove it from the proposed district plan.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the amendment of the definition for ‘Clearance of Indigenous Vegetation’ or deletion of the definition or with similar wording:</p> <p><u>Clearance of Indigenous Vegetation means:</u></p> <ul style="list-style-type: none"> means the clearing or removal of ‘indigenous vegetation’ by any means, including grazing, cutting, crushing, cultivation, spraying, irrigation, chemical application, artificial drainage, overplanting, over sowing, or burning. <p>(a) any consequential amendments required as a result of the relief sought.</p>
Part 1 – Introduction and General Provisions – Interpretations - Definitions – Cultivation	7	Support in part.	<p>Federated Famers seeks to amend the definition of ‘Cultivation’ to better fit the process of cultivation, that better represents the process occurring in the district.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the inclusion of a new definition for ‘Cultivation’ as outlined below or with similar wording:</p> <p><u>Cultivation means:</u></p> <ul style="list-style-type: none"> <u>means any process that involves the turning or tilling the land. It can include:</u> <ul style="list-style-type: none"> <u>Pasture renewal</u> <u>Cropping (such as maize)</u> <u>Intensive farming (such as commercial vegetable growing)</u> means the alteration of disturbance of land (or any matter constituting the land including soil, clay, sand and rock) for the purpose of sowing, growing or harvesting of pasture or crops.

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
				(b) any consequential amendments required as a result of the relief sought.
Part 1 – Introduction and General Provisions – Interpretations – Definitions – Earthworks	8	Oppose	Federated Farmers seeks to see this definition removed. This definition is already well covered in the proposed amendments by Federated Farmers in the ‘Ancillary Rural Earthworks’.	Federated Farmers seeks the relief of: (a) means the alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including the soil, clay, sand and rock); but excludes gardening, cultivation, and disturbance of land for the installation of fence posts. (b) any consequential amendments required as a result of the relief sought.
Part 1 – Introduction and General Provisions – Definition – Farm Quarry	9	Strongly Support	Federated Farmers supports the inclusion of a definition for ‘Farm Quarry’.	Federated Farmers seeks the retention of the proposed definition for a ‘Farm Quarry’ or amended wording that has the same intent.
Part 1 – Introduction and General Provisions – Definition – Fertiliser	10	Strongly Support	Federated Farmers supports the inclusion of a definition for ‘Fertiliser’.	Federated Farmers seeks the retention of the proposed definition for a ‘Fertiliser’ or amended wording that has the same intent.
Part 1 – Introduction and General Provisions – Definition – Intensive Indoor	11	Oppose	Federated Farmers seeks to remove this definition as it can be defined within the definition of ‘Intensive Primary Production’.	Federated Farmers seeks the relief of the proposed definition for ‘Intensive Indoor Primary Production’.

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Primary Production				
Part 1 – Introduction and General Provisions – Definition – Intensive Outdoor Primary Production	12	Oppose	Federated Farmers seeks to remove this definition as it can be defined within the definition of ‘Intensive Primary Production’.	Federated Farmers seeks the relief of the proposed definition for ‘Intensive Outdoor Primary Production’.
Part 1 – Introduction and General Provisions – Definition – Intensive Primary Production	13	Support in part	<p>Federated Farmers seeks that the following definition be encompassed into the broader definition of ‘Intensive Primary Production’.</p> <ul style="list-style-type: none"> • Intensive Indoor Primary Production, • Intensive Outdoor Primary Production, • Intensively Farmed Stock, <p>There is no need to break-down a definition. This creates confusion amongst rate payers.</p> <p>The inclusion of feeding ‘<i>supplementary feed during adverse weather events such as drought or snow</i>’, we strongly oppose. This captures more than intended under the definition. Supplementary feed in an adverse weather event is critical for stock welfare. To restrict a landowner's ability to provide welfare to their stock is something that we discourage the council from engaging in.</p> <p>We also urge the council caution as the proposed definitions could have major unintended consequences such as capturing dairy grazing bulls which are not seen as intensively farmed animals.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the inclusion of a definition for ‘Intensive Primary Production’ as outlined below or with similar wording:</p> <p><u>‘Intensive Primary Production’ means:</u> <i>refers to any of this following:</i></p> <p>(a) <u>commercial livestock kept and fed permanently in buildings or indoor enclosures on a particular site, where the stocking density precludes the maintenance of pasture or ground cover (e.g pig farming)</u></p> <p>(b) <u>Land and buildings used for the commercial boarding and/or breeding of cats, dogs and other domestic cover</u></p> <p>(c) <u>farming of mushrooms or other fungi</u></p> <p>(d) <u>dairy cattle, including cows, that are being milked on irrigated land.</u></p> <p>(e) <u>Intensive winter grazing, that does not follow council rules.</u></p> <p>(f) any consequential amendments required as a result of the relief sought.</p>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
			Federated Farmers raises that dry cattle stock on non-irrigated land are not intensively farmed in a way similar to those who are dairy and cattle on irrigated land. It would be premature to classify dry stock into this category. This should not be discouraged by the District Plan.	
Part 1 – Introduction and General Provisions – Definition – Light Sensitive Areas	14	Support in part	<p>Federated Farmers supports the inclusion of definitions for ‘Light Sensitive Areas’ in the proposed district plan. The definition is clear, concise, and easy to understand.</p> <p>It would be appropriate to add further to the definition that appropriately includes farms as excluded from Light sensitivity for purpose of primary production within the definition.</p> <p>Federated Farmers also finds it concerning that there is light sensitivity for the SNA areas. Farms need light to operate safely and conduct their business (e.g harvesting), this should not be restricted by council, we urge that council do not try and regulate such areas. We see no justification in capturing SNA, which mostly includes cabbage trees. We oppose the inclusion of SNA in this definition.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the inclusion of a definition for ‘Light Sensitive Areas’ as outlined below or with similar wording:</p> <p><u>‘Light Sensitive Areas’ means:</u></p> <ul style="list-style-type: none"> • <u>includes land in the following areas outside the Port Zone, unless the land is needed for primary production, including but not limited too dairy sheds, pest control, rural aviation needs, security, harvesting of crops, primary production needs where seen fit, whist taking into consider the overlays.:</u> <ol style="list-style-type: none"> (a) <i>Wahi tapu, Wahi taoka and Wai taoka Overlays,</i> (b) <i>Significant Natural Areas Overlay</i> (c) <i>Visual Amenity Landscape Overlay</i> (d) <i>The Rural Lifestyle Zone; and</i> (e) <i>The Natural Open Space Zone.</i> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 1 – Introduction and General Provisions – Definition – National Grid Subdivision Corridor	15	Support in part	Federated Farmers supports in part the inclusion of these as means of safety for lines maintenance. We do urge the council to be cautious and not to extend these corridors any further than what is minimally necessary, especially on private property.	Federated Farmers seeks the retention of the proposed definition for a ‘National Grid Subdivision Corridor’ or amended wording that has the same intent.

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Part 1 – Introduction and General Provisions – Definition – National Grid Yard	16	Oppose in part	<p>Federated Farmers opposes the definition of The ‘National Grid Yard’ needs to be amended so it is consistent with NZECP34 Code of Practice for Electrical Safe Distances, particularly Section 2.4.1 around support structures. This definition and the yard widths are not consistent and unnecessarily onerous compared to the Code and need amendment. It is vital to remember that the National Grid runs over private property, and farmers will be overwhelmingly affected by any regulation that exceeds the Code.</p> <p>The Code requires a safe distance of 8m around a 110kv pole, which is the most common structure on the FHL-WDV-A and B lines across Timaru District. Requiring a yard of 12m in the District Plan is excessive. Towers may have the safe distance of 12m, as this is consistent with the Code requirements.</p> <p>The reason the National Grid Yard must be consistent with, and not more onerous than, the Code, is because otherwise it will create a regulatory anomaly where an activity is permitted by the Code but not by the District Plan. This is untenable, as there is no reason why the Council should require or decline consent when the Code permits the activity and the National Grid operator cannot refuse permission.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the inclusion of the definition ‘National Grid Yard’ as worded, or of similar wording; <i>means, as depicted in Diagram 1:</i> <i>the area located within 10m 8m of either side of the centreline of an above ground 110kV electricity transmission line on single poles;</i> <i>the area located within 12m either side of the centreline of an above ground transmission line on pi-poles or towers that is 110kV or greater;</i> <i>the area located within 12m in any direction from the outer visible edge of an electricity transmission pole or tower foundation, associated with a line which is 110kV or greater.</i> <i>The measurement of setback distances from National Grid transmission lines must be undertaken from the centre line of the National Grid transmission line and the outer edge of any support structure. The centre line at any point is a straight line between the centre points of the two support structures at each end of the span.</i> <i>Note: the National Grid Yard does not apply to underground cables or any transmission lines (or sections of line) that are designated.</i> <i>Diagram 1 – National Grid Yard and National Grid Subdivision Corridor.</i></p> <p>(b) any consequential amendments required as a result of the relief sought.</p>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought												
			<p>TABLE 1 MINIMUM SAFE DISTANCES BETWEEN BUILDINGS AND OVERHEAD ELECTRIC LINE SUPPORT STRUCTURES</p> <table border="1"> <thead> <tr> <th>Circuit Voltage</th> <th>Pole</th> <th>Tower (pylon)</th> </tr> </thead> <tbody> <tr> <td>11 kV to 33 kV</td> <td>2 m</td> <td>6 m</td> </tr> <tr> <td>Exceeding 33 kV to 66 kV</td> <td>6 m</td> <td>9 m</td> </tr> <tr> <td>Exceeding 66 kV</td> <td>8 m</td> <td>12 m</td> </tr> </tbody> </table> <p>Section 2.1.1 of NZECP34 states one of its purposes is to ensure that the support structures can be accessed for inspection and maintenance. These setbacks have been developed by engineers, and there is nothing to suggest that the Code’s setback distances are deficient.</p>	Circuit Voltage	Pole	Tower (pylon)	11 kV to 33 kV	2 m	6 m	Exceeding 33 kV to 66 kV	6 m	9 m	Exceeding 66 kV	8 m	12 m	
Circuit Voltage	Pole	Tower (pylon)														
11 kV to 33 kV	2 m	6 m														
Exceeding 33 kV to 66 kV	6 m	9 m														
Exceeding 66 kV	8 m	12 m														
Part 1 – Introduction and General Provisions – Definition – Non-Intensive Primary Production.	17	Support	Federated Farmers supports the inclusion of a definition for ‘Non-Intensive Primary Production’.	Federated Farmers seeks the retention of the proposed definition for a ‘Non-Intensive Primary Production’ or amended wording that has the same intent.												
Part 1 – Introduction and General Provisions – Definition – Plantation Forestry	18	Support in part	<p>Federated Famers seeks to amend the definition of ‘Plantation Forestry’, that better represents the process occurring in the district.</p> <p>Federated Framers recognises this definition from the <i>National Environmental Standards for Plantation Forestry</i>, however the 1ha minimum will mean that farm forestry is inappropriately captured when it is only part of an existing farm. This will lead to farm forestry becoming restricted by CE-R2 for the Coastal Environment and viewed as an activity that is incompatible with the landscape values. Farm</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the inclusion of a definition for ‘Plantation Forestry’ as outlined below or with similar wording:</p> <p><i>as defined in the Resource Management (National Environment Standards for Plantation Forestry) Regulations 2017 (as set out below) means a forest deliberately established for commercial purposes, being—</i></p> <p>a) <i>at least 1 ha 50ha of continuous forest cover of forest species that has been planted and has or will be harvested or replanted; and</i></p>												

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
			<p>forestry is distinct from large scale forestry where whole properties are forested.</p> <p>There is no purpose for farm forestry to be so restricted in ordinary Rural Zoned land, and farm forestry should be recognised as consistent with the amenity of the rural zones.</p> <p>Support is given for shelterbelts and soil conversation planting being excluded from the definition of 'Plantation Forestry'.</p>	<p><i>b) includes all associated forestry infrastructure; but</i> <i>c) does not include—</i></p> <ul style="list-style-type: none"> <i>i. a shelter belt of forest species, where the tree crown cover has, or is likely to have, an average width of less than 30 m; or</i> <i>ii. forest species in urban areas; or</i> <i>iii. nurseries and seed orchards; or</i> <i>iv. trees grown for fruit or nuts; or</i> <i>v. long-term ecological restoration planting of forest species; or</i> <i>vi. willows and poplars space planted for soil conservation purposes</i> <p><i>(b) any consequential amendments required as a result of the relief sought.</i></p>
Part 1 – Introduction and General Provisions - Definition – Land-based Primary Production	19	Support	<p>Federated Farmers supports the inclusion of a definition for 'Land-based primary production. <i>The National Policy Statement for Highly Productive Land</i> came into force on 12 October 2022 and contains an appropriate definition for land-based primary production that can be used.</p> <p>The District Plan contains a definition for 'Primary Production' which includes non-land-based activities as well as the initial processing of goods. The definition is not easy to understand or to work out what it is covered and what is not.</p> <p>Given that there is now national direction on how to address highly productive soils, it would be appropriate to use the definitions in the national policy statement to achieve consistency in the district plan.</p>	<p>Federated Farmers seeks the following relief:</p> <ul style="list-style-type: none"> (a) the inclusion of the definition for 'Land-based Primary Production' as defined in the <i>National Policy Statement for Highly Productive Land 2022</i> into the District Plan; and (b) any consequential amendments required as a result of the relief sought.
Part 1 – Introduction and General	20	Support in part	<p>Federated Farmers supports the inclusion of definitions for 'Quarry and Quarrying Activities' in the proposed district</p>	<p>Federated Farmers seeks the following relief:</p>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Provisions - Definitions - Quarry and Quarrying Activities			plan. The definitions are clear, concise, and easy to understand. It would be appropriate to add to both definitions that 'Farm Quarries' are excluded from them so that there is an appropriate cross reference between the definitions.	(a) the addition of the statement " <i>This definition specifically excludes farm quarries and their activities</i> " at the end of the definitions for 'Quarry and Quarrying Activities'; and (b) any consequential amendments required as a result of the relief sought.
Part 1 – Introduction and General Provisions - Definitions – Reverse Sensitivity	21	Strongly Support	Federated Farmers support the inclusion of the definition for 'Reverse Sensitivity' is an important resource management issue for Federated Farmers, we consider this definition accurately describes 'Reverse Sensitivity'.	Federated Farmers seeks the following relief: (a) retention of the proposed definition for a 'Reverse Sensitivity' or amended wording that has the same intent. (b) any consequential amendments required as a result of the relief sought.
Part 1 – Introduction and General Provisions - Definitions – Riparian Margin	22	Support in part	Federated Famers seeks to amend the definition of 'Riparian Margin', this definition is too prescriptive and creates unnecessary margins for the definitions. We acknowledge the RMA, <i>Stock Exclusion Regulation 2020</i> , which states a 3-meter setback. However, we urge the council to follow advice set out by the Landcare report to the Tasman District Council in 2020 ¹ . This report outlines a recommend riparian margin setback of between 10-20 meters. We urge the council to follow this advice and change the definition to the 20-meter setback. Also, it is important to state that Natural Character-P2(6) states that "riparian margins provide a buffer from activities that may adversely affect the natural character values of the river or wetland". We are perplexed on why the district council requires/needs another 100m buffer?	Federated Farmers seeks the following relief: (a) the addition to the definition so it reads the following or with similar wording; <i>means land that is within:</i> <i>10m of the bank of that part of a river that is up to 3m wide (and is not listed in (c) below); and/or</i> <i>20m of the bank of that part of a river that is greater than 3m wide (and is not listed in (c) below); and/or</i> <i>20m 100m of the banks of the Rangitata; Ōpihi; and Ōrāri Rivers <u>and of any wetland.</u></i> <i>50m of any wetland.</i> (b) any consequential amendments required as a result of the relief sought.

¹ [LandCare Report \(envirolink.govt.nz\)](https://envirolink.govt.nz)

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
			<i>Riparian margins are key to filtering out nutrients and toxins before they hit the waterways. A riparian margin that is planted too far from the water source is unable to catch those toxins and nutrients that leach before they hit the waterways. Council have created unnecessary regulation on private property and we urge council to reconsider this definition.</i>	
Part 1 – Introduction and General Provisions - Definitions – Riparian Zone	23	Oppose	Federated Farmers opposes this definition as it is not included anywhere in the proposed district plan. Creating definitions for the sake of definitions is not helpful and creates anxiety for ratepayers.	Federated Farmers proposed that this definition be removed from the proposed district plan.
Part 1 – Introduction and General Provisions - Definitions – Shelter Belt	24	Support in part	Federated Farmers supports the inclusion of definitions for ‘shelter belt’ in the proposed district plan. The definition is clear, concise, and easy to understand. It would be appropriate to add to acknowledge the ecological importance that shelter belts bring to biodiversity. They create habitats for fauna (eg tui, korimako, insects etc). In times of drought these can also be used as feed, whilst protecting crops from extreme weather, increasing yields. Shelter belts are also a key requirement for animal welfare. It would be appropriate for the definition to be amended to acknowledge these considerations.	Federated Farmers seeks the following relief: (a) the inclusion of a definition for ‘Shelter Belt’ as outlined below or with similar wording: <u>‘Shelter Belt’ means:</u> <ul style="list-style-type: none"> <i>means any trees planted primarily to provide shelter for stock, crops, <u>creating ecological habitats for insects, providing a food source in drought-like events, or buildings from the prevailing wind(s), or extreme climatic events.</u> Shelter belts are no greater than 30 meters in width and are not clear felled (unless the clear is for replanting of a new shelterbelt, or for purposes such as health and safety for the farm).</i> (b) any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters				

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Strategic Direction				
Part 2 – District-wide Matters – Strategic Direction – SD Strategic Direction – Objectives – Residential Areas and Activities- SD-O1	25	Support in part	Federated Farms support the directions set in the strategic overview. We strongly support the inclusion of the limited rural lifestyle development opportunities are provided in the residential areas, encroaching on rural land. This ensure that farmland is protected, and urban areas are better developed/planned. However, direction 2 inside SD-O1 does need to be strengthen to the idea that land could be needed for houses as urban sprawl is eventual as populations change. The council needs to acknowledge that there needs to be protection from urban sprawl on highly productive land.	Federated Farmers seeks the following relief: (a) the amendment of direction 1 so that it reads: <i>limited rural lifestyle development opportunities are provided where they concentrate and are attached to existing urban areas, achieve coordinated pattern of development and are capable of efficiently connecting to reticulate sewer and water infrastructure, <u>while recognising the productive capabilities of the soils and location.</u></i> (b) any consequential amendments required as a result of the relief sought.
Part 2 – District-wide Matters – Strategic Direction – SD Strategic Direction – Objectives – The Natural and Historic Environment- SD-O2	26	Strongly Support	Federated Farmers supports the natural and historic environment as it is currently drafted in the proposed district plan.	Federated Farmers seeks the following relief: (a) the retention of the overview as currently drafted or wording with similar effect; and (b) any consequential amendments required because of the relief sought.
Part 2 – District-wide Matters – Strategic Direction – SD Strategic Direction – Objectives –	27	Support in part	Federated Farmers acknowledges the role tangata whenua play and often lead for outcomes for the district. We suggest minor amendments to the objectives to recognise that involvement of iwi and hapu alongside communities will enable better outcomes for the district. It is important for the council to recognises that many of these sites of significance are on private property and that tangata whenua, cannot use private property as an access-	Federated Farmers seeks the following relief: (a) the amendment of objective SD- O5 -iii so that it read as follows: <i>Kati Huirapa retains, and where if appropriate, <u>agreed to by private landowners, the ability to enhance access to their sites and areas of significance. Kati Huirapa recognises many of these are on private land and must form relationships between landowner and hapu on a case-by-case basis. Kaiti</u></i>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Mana Whenua-SD-O5			<p>way to these sites and areas of significance. These are working properties and farmers must take into consideration the animal welfare, health and safety of the business they are running.</p> <p>Relationships to develop accessways need to be between the private landowner and hapu, this is something that cannot be created or forced by council. We strongly urge the council to allow these relationships to be created.</p>	<p><u>Huirapa recognises that accessway may be denied for health and safety or animal welfare by the landowner, access is a privilege, not a right.</u></p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 2 – District-wide Matters – Strategic Direction – SD Strategic Direction – Objectives – Rural Areas- SD-O9	28	Support in part	<p>Federated Farmers supports proposed objectives SD-09 recognising the importance of the primary production sector and the need to protect highly protective soils from inappropriate development.</p> <p>We are living in rapidly changing world where it has reached the point where we must adapt to meet the needs and constraints of the environment. Federated Farmers seeks the inclusion of an additional objective to recognise the importance of providing for and supporting land practice change to address biosecurity, climate, and environmental demands both from regulation and consumer demand. As regulation and markets are driving certain change and practices, the district plan needs to provide for this change to ensure economic viability for rural producers.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the addition of new objective SD-09- vii which reads: <u>Primary production activities are supported by Council to adapt to change required by regulatory and consumer demands.</u> or wording with a similar intent; and</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
UFD – Urban Form and Development				
Part 2 – District Wide Matters-Strategic Direction-UFD Urban Form and Development-Settlement Patterns	29	Strongly Support	Federated Farmers generally supports this chapter of the proposed district plan as drafted.	<p>Federated Farmers seeks the following relief:</p> <p>(a) the retention of the minimises the loss of versatile soils as currently written or with wording of similar intent; and</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Hazards and Risks				
Natural Hazards				
Part 2 – District Wide Matters – Hazards and Risks – NH – Natural Hazards – Overview	30	Support	<p>Federated Farmers supports the accurate mapping of the flood and coastal hazard areas and would expect engagement to occur to the relevant impacted landowners who are located within those areas.</p> <p>We support the use of the precautionary approach in respect of natural hazards. The approach taken by the Council is consistent with regional and national policy documents as well as what is being done internationally. Federated Farmers also supports the approach proposed by the Council that the focus will be placed on vulnerable activities (e.g., liveable dwellings) and it will be these activities that will have the more stringent plan controls placed on them.</p> <p>Federated Farmers supports enabling non-liveable farm ancillary buildings as permitted activities within the natural hazard areas as long as this has been clearly communicated to the landowners along with the associated risks of doing so. This means the landowner is fully informed when they make the decision to locate ancillary buildings that have a functional need to be located in or around coastal and flood hazard areas.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the retention of the overview as currently drafted or wording with similar effect; and</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 2 – District Wide Matters – Hazards and Risks – NH – Natural Hazards – Objectives	31	Support	Federated Farmers supports objectives NH-O1 to NH-O3 as currently drafted.	<p>Federated Farmers seeks the following relief:</p> <p>(a) the retention of objectives NH-O1 to NH-O3 as currently drafted or wording with similar effect; and</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 2 – District Wide Matters –	32	Support	Federated Farmers supports policies NH-P1 to NH-P11 as currently drafted.	Federated Farmers seeks the following relief:

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Hazards and Risks – NH – Natural Hazards – Policies				(a) the retention of objectives NH-P1 to NH-P11 as currently drafted or wording with similar effect; and (b) any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Hazards and Risks – NH – Natural Hazards – Rules	33	Support	Federated Farmers supports the inclusion of rules NH-R1 to NH-R9 as currently worded in the proposed district plan.	Federated Farmers seeks the following relief: (a) the retention of rules NH-R1 to NH-R9as currently drafted or wording with similar effect; and (b) any consequential amendments required as a result of the relief sought.
Hazardous Substances				
Part 2 – District Wide Matters – Hazards and Risks – HS – Hazardous Substances – Overview	34	Support	Federated Farmers supports the precautionary approach in respect of natural hazards. Federated Farmers also supports the approach proposed by the Council that the focus will be placed on vulnerable activities (e.g., liveable dwellings) and it will be these activities that will have the more stringent plan controls placed on them. Federated Farmers supports enabling non-liveable farm ancillary buildings as permitted activities within the natural hazard areas as along this has been clearly communicated to the landowners along with the associated risks of doing so. This means the landowner is fully informed when they make the decision to locate ancillary buildings that have a functional need to be located in or around coastal and flood hazard areas.	Federated Farmers seeks the following relief: (a) the retention of the overview as currently drafted or wording with similar effect; and (b) any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Hazards and Risks – HS – Hazardous	35	Support	Federated Farmers supports objectives HS-O1 to HS-O3 as currently drafted. In particular, we support objective NH-O3 which recognises that there may be a functional need for new infrastructure to be located within identified hazard areas.	Federated Farmers seeks the following relief: (a) the retention of objectives NH-O1 to NH-O4 as currently drafted or wording with similar effect; and (b) any consequential amendments required as a result of the relief sought.

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Substances – Objectives				
Part 2 – District Wide Matters – Hazards and Risks – HS – Hazardous Substances – Policies	36	Support	Federated Farmers supports policies HS-P1 to HS-P4 as currently drafted.	Federated Farmers seeks the following relief: (a) the retention of objectives HS-P1 to HS-P4 as currently drafted or wording with similar effect; and (b) any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Hazards and Risks – HS – Hazardous Substances – Rules HSR	37	Support	Federated Farmers supports rules HS-R1 and HS-R4 as currently drafted in the proposed district plan.	Federated Farmers seeks the following relief: (a) the retention of the Rules HS-R1 and HS-R4 as currently drafted or wording with similar effect; and (b) any consequential amendments required as a result of the relief sought.
Historic Heritage				
Part 2 - District wide matters - Historical and cultural values – HH- Historic heritage - Overview	38	Oppose in part	Federated Farmers is concerned that the Council is using regulatory methods as a means to manage historic heritage without the non-regulatory methods supporting in the background. Council needs to utilise more non-regulatory methods for managing historical heritage. Landowner engagement and education should be the first approach to the effective management of historic heritage rather than the Council relying on regulatory methods which will only work where there is damage and change to the historic heritage features. As well, the overview needs to be consistent with the requirements of s6(f) of the Resource Management Act 1991. Section 6(f) requires the recognition and provision of the protection of historic heritage from inappropriate subdivision, use and development. Only inappropriate	Federated Farmers seeks the following relief: (a) the amendment of the overview section to the historic heritage chapter so that it promoted the use of non-regulatory methods as well as ensuring that historic heritage will be protected from inappropriate subdivision, use and development; and (b) any consequential amendments required as a result of the relief sought.

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
			activities that could cause more than minor effects on heritage and cultural values should be managed. Existing use rights of lawfully established activities also need to be recognised and protected.	
Part 2 - District wide matters - Historical and cultural values – HH- Historic heritage – Objectives	39	Support	Federate Farmers supports the objectives as drafted for the proposed district plan.	Federated Farmers seeks the following relief: (a) the retention of the objectives as proposed or with wording to similar effect; and (b) any consequential amendments required as a result of the relief sought.
Part 2 - District wide matters - Historical and cultural values – HH- Historic heritage – Policies	40		Federated Farmers supports the Polices as written in the proposed district plan. Federated Farmers wishes to acknowledge the balance between land use and heritage values in its proposed policies.	Federated Farmers seeks the following relief: (a) the retention of the polices as proposed or with wording to similar effect; and (b) any consequential amendments required as a result of the relief sought.
Part 2 - District wide matters - Historical and cultural values – HH- Historic heritage – Rule HH-R1,HH-R2,HH-R3,HH-R4,HH-R5	41	Support	Federated Farmers supports the rule, HH-R1,HH-R2,HH-R3,HH-R4, and HH-R5 as written in the proposed district plan.	Federated Farmers seeks the following relief: (a) the retention of the rules, HH-R1,HH-R2,HH-R3,HH-R4 and HH-R5 as proposed or with wording to similar effect; and (b) any consequential amendments required as a result of the relief sought.
Part 2 - District wide matters - Historical and cultural values – HH- Historic	42	Oppose	Federated Farmers opposes the rules HH-R10, and HH-R16, which restricts the subdivision of land where a heritage site and value is present. Heritage New Zealand states in their ' <i>Sustainable Management to Heritage Guidance</i> ', 'states that	Federated Farmers seeks relief on the following; (a) the removal of rules HH-R10, and HH-R16, as it is already covered in other regulation.

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
heritage – Rule HH-R10, and HH-R16			Subdivision that results in positive outcomes for historic heritage should be encouraged'. It is over regulatory for the council to restrict development if it will benefit the historical area. Private landowners should have the rights to subdivide land which will enhance an area.	(b) any consequential amendments required as a result of the relief sought.
Notable Trees				
Part 2- District Wide Matters – Historical and Cultural Values – Trees- Notable Trees – Overview	43	Support	Federated Farmers supports the recognition and identification of notable trees which are of importance to the district and its communities. However, it is considered that it will be important if the notable tree/s is/are located on private land that engagement between the Council and landowners needs to occur to ensure that the tree is best managed for future generations. This can be achieved through a mixture of regulatory and non-regulatory methods.	Federated Farmers seeks the following relief: (a) the inclusion of a sentence in the overview that discusses the need for engagement to occur between the Council and landowners over how best to achieve the protection of a notable tree or trees, or with wording to similar effect; and (b) any consequential amendments required as a result of the relief sought.
Part 2- District Wide Matters – Historical and Cultural Values – Trees – Rule 3	44	Support in part	Federated Farmers supports in part Rule TREES-R3 as it is currently drafted in the proposed district plan. The rule does not provide for mechanical cultivation within the rootzone of a notable tree or trees as a permitted activity. A rootzone area can be 3 times the area of the trees canopy and can vary significantly between tree species. Federated Farmers recommends that the rule is amended to provide for mechanical cultivation within the rootzone area. As well, it is recommended that the Council uses the term 'tree protection zone' instead of the rootzone area. The term 'tree protection zone' is used in a number of plans and policies in New Zealand. It is a term that is recognised by suitably qualified arborists and can easily be calculated by (a) canopy drip line + 1m; (b) trunk diameter at 1.4m height multiplied by 12; and (c) tall narrow trees = ½ x Height.	Federated Farmers seeks the following relief: (a) the amendment of rule TREES-R3 as follows: <i>PER-1</i> <i>The activity or development is not for any of takes into <u>consideration The Tree Protection Area of notable Tree or Trees while the following could occur;</u></i> <i>1. any earthworks including trenching;</i> <i>2. establishment of new impervious surface; or</i> <i>3. new buildings, <u>with consent</u>; or</i> <i>4. new structures including fences and signs, (temporary and permanent)</i> or wording to similar effect; and (b) any consequential amendments required as a result of the relief sought.

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
			The tree protection zone will ensure that areas critical to the tree's health are protected and that resource users are able to understand the setbacks required.	
Sites and Significance to Māori				
Part 2- District Wide Matters – Historical and Cultural Values – SASM – Sites and Significance to Māori	45	Support in part	<p>Federated Farmers fully supports the identification and protection of wāhi tapu, wāhi tapu and sites and areas of significance to Māori. What the overview does not highlight is that the identification and protection occurs as a result of effective engagement and creation of an enduring relationship between tangata whenua and the landowner where the wāhi tapu, wāhi taonga and sites and areas of significance are located. It is disappointing that the Council appears to only be prepared to use regulatory methods via consent processes to create opportunities for good faith and understanding to develop.</p> <p>Landowners should have more of a say in matters such as these as they are not someone with greater rights than those of the general public when it comes to their land. Council needs to be prepared to provide sufficient information to landowners on the location and extent of sites or areas of Significance to Māori on their property needs to be provided so that they are aware of any restrictions that apply, and any obligations that they may have. Council should be working to facilitate better outcomes so that the best possible outcomes are achieved.</p>	<p>Federated Farmers seeks the following relief:</p> <ul style="list-style-type: none"> (a) the inclusion of appropriate wording in the overview that recognises the role that landowners of private property have to play in the identification and protection of sites and areas of significance to Māori; and (b) the inclusion of appropriate wording which essentially states that the Council will play a major role in facilitating an enduring relationship and promoting effective engagement between tangata whenua, landowners and the Council in the identification and protection of sites and areas of significance to Māori; and (c) any consequential amendments required as a result of the relief sought.
Part 2- District Wide Matters – Historical and Cultural Values – SASM – Sites and Significance to Māori –	46	Support in part	Federated Farmers supports the need for protection of Sites and Areas of Significance to Māori that have been identified with precision. We are also supportive of measures agreed upon by the landowners for Kati Huirapa having access to significant sites for cultural purposes, within reason. However, some of objectives and policies are too far reaching and create anxiety for rural communities.	<p>Federated Farmers seeks the following relief:</p> <p>the addition of new policy SASM-P9 that reads:</p> <ul style="list-style-type: none"> (a) <u>Provide recognition for grazing and farming activities that have not increased in their scale or intensity of effects from commencement date of the plan.</u> or with wording to similar effect; and

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Objectives and Policies			<p>There are concerns that the objectives and policies do not provide for existing activities to continue. There needs to be an additional policy that recognises and provides for existing activities such as grazing and other farming activities to continue as long as the scale and intensity of effects do not/have not increased following the commencement date of the plan.</p> <p>There are also concerns around access to private property to the sites of significance. Property rights need to be recognised and respected. It is important that relationships are formed on a private landowner and Kati Huirapa scale. There needs to be an understanding of access when and where, otherwise illegal access could be seen as trespassing.</p>	(b) any consequential amendments required as a result of the relief sought.
Part 2- District Wide Matters – Historical and Cultural Values – SASM – Sites and Significance to Māori – Objectives – O1	47	Support in part	<p>Federated Farmers understands the importance of decision making in/around the sites of significance. However this can be far overreaching and invasive to farm operations. It is important to recognise the intergenerational view that farmers hold in protecting their land for future generations. Many farmers in the district have farmed the same land for more than 150 years.</p> <p>Landowners appreciate the creation of enduring relationships, recognised as a directly affected party hosting wider benefit resources, not just someone with no greater rights than those of the general public.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the amendment of objective SASM- O1 so that it read as follows: <i>Kaiti Huirapa are actively involved in decision making that affects the values of the identified Sites and Areas of Significance to Kati Huirapa, <u>not extending to existing use rights, the value of landowners land, and only when required at no cost to the landowner.</u></i></p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 2- District Wide Matters – Historical and Cultural Values – SASM – Sites	48	Support in part	<p>Federated Farmers acknowledges the need to access these sites for maintenance and for cultural needs. However, we stress that it is important to acknowledge that many of these sites reside on large scale working farms. Access to</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the amendment of objective SASM- O2 so that it read as follows:</p>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
and Significance to Māori – Objectives – O2			<p>these sites on private property can only be via consultation and permission of the landowner.</p> <p>Relationships need to be developed, rather than council applying regulatory methods that create reactive environments for farmers to operate in. The council needs to acknowledge the effort that farmers put into the protection of their land/resources for future generations.</p> <p>Council also needs to provide landowners with detail specific on where the site are located, how big is it, and what this site was used for. Mapping large areas, if not whole farms is inappropriate, if specific detail cannot be supplied to landowner.</p>	<p><i>Kaiti Huirapa are able to access <u>if appropriate agreed to by private landowner, the ability to, maintain and use resources and areas of cultural values within the identified Sites and Areas of Significance, access to sites that need to be identified in detail to landowners.</u></i> to <i>Kaiti Huirapa, following health and safety of the landowner, whilst not disturbing the welfare of animals and farm operations.</i></p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 2- District Wide Matters – Historical and Cultural Values – SASM – Sites and Significance to Māori – Objectives – O3	49	Support in part	<p>Federated Farmers acknowledges the importance of these sites to Kaiti Hurapa are and their identity to the land. We do stress that it is important that it does not affect the existing use rights of landowners and their operations on the farm.</p> <p>Climate Change is an issue that is going to affect the district in various of ways. Māori have made it clear that they need environments to become resilient to protect their cultural and historical values. To recognise the issue of climate change will give landowners an option to better mitigate the effects of this under the proposed plan.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the amendment of objective SASM-03 so that it read as follows: <i>The values of identified areas and sites of significance to Kaiti Huirapa are recognised and protected from inappropriate subdivision, use and development, <u>unless it fits within the existing rights of the landowner, or as a mitigation to the effects of climate change.</u></i></p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 2- District Wide Matters – Historical and Cultural Values – SASM – Sites and Significance	50	Support in part	<p>Federated Farmers acknowledges Māori as first people of the land.</p> <p>If land cannot be correctly identified with accuracy and be site specific, we suggest surrounding land is not classified under the layers of SASM.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the amendment of policy SASM- P1 so that it read as the following: <i>Work with Kaiti Huirapa to identify and list Sites and Areas of Significance to Kaiti Huirapapa in SCHED6- Schedule of Sites and Areas of Significance to Kaiti Huirapa , and</i></p>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
to Māori – Policies – P1			<p>This is counterproductive to the formation of relationships, especially when this is whole private properties.</p> <p>Federated Farmers acknowledges that these are significant sites but urge caution to allowing Chiefdom to be exercised on private property without consultation or consent from landowners. Relations to be proactive than reactive due to council regulation.</p>	<p>recognise and provide for the with landowners in consultation with the identified sites and areas, managing the resources inside that site in relationship building. Exercise of rangitiratoka by Kati Huirapa in decisions made in relation to these sites and areas.</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 2- District Wide Matters – Historical and Cultural Values – SASM – Sites and Significance to Māori – Policies – P2	51	Strongly Agree	<p>Federated Farmers support is extended to this policy. Developing protocols and key contact people will give landowners some confidence when wanting to conduct activities near SASM.</p> <p>Consultation should be outside a council setting away from bureaucracy, and the basis should be developed on an individual relationship between hapu and landowner.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the addition of policy SASM – P2 so it read as the following: <i>Encourage and facilitate consultation and engagement between landowners and applicants with Kati Huirapa, prior to applying for consent and/or undertaking activities within or adjacent to the identified site and areas listed in SCHED6- Schedule of Sites and Areas Significant to Kati Huirapa, as being the most appropriate way to obtain understanding of the potential impact of any activity on the site of area. <u>To establish a schedule of key hapū / tangata whenua representatives who will be notified of, or consulted on, applications received for subdivision consents or resource consents relating to proposals affecting or potentially affecting wāhi tapu, wāhi taonga, or site(s) of significance.</u></i></p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 2- District Wide Matters – Historical and Cultural Values – SASM – Sites and Significance	52	Support	<p>Federated Farmers support is extended to this policy. Developing protocols and key contact people will give landowners some confidence when wanting to conduct activities near sites.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the retention of SASM – P3 as currently written or with wording of similar intent; and</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
to Māori – Policies – P3				
Part 2- District Wide Matters – Historical and Cultural Values – SASM – Sites and Significance to Māori – Policies – P4	53	Support	<p>Federated Farmers supports this policy as it stands. Putting aside any issues with the accuracy of the schedule it is important to ensure the rules are linked to SASM-SCHED6 to provide certainty and focus limited resources.</p> <p>Landowners will prefer a direct relationship with local runanga, and we have heard of very positive relationships where both parties have an interest in an area of land and have negotiated directly with outcomes that suit both. Council is often an unnecessary intermediary party in some cases.</p>	<p>Federated Farmers seeks the following relief:</p> <ul style="list-style-type: none"> (a) the retention of SASM – P4 as currently written or with wording of similar intent; and (b) any consequential amendments required as a result of the relief sought.
Part 2- District Wide Matters – Historical and Cultural Values – SASM – Sites and Significance to Māori – Policies – P5	54	Support in part	<p>Federated Farmers supports this policy as it stands but seeks relief and addition of some wording.</p> <p>Federated Farmers as mentioned above sees it as vital that landowners are included in conversations and decisions regarding the SASM on their lands. These sites need to be protected however it needs to be a conversation between the local tangata whenua and landowners, not council.</p> <p>Farmers understand the value they add to their local history and as intergenerational landowners it adds more importance to the legacy they leave when land is passed down.</p>	<p>Federated Farmers seeks the following relief:</p> <ul style="list-style-type: none"> (a) the retention of the SASM -P5 as currently written or with wording of similar intent, with one addition. <i>‘3. Maintenance of enhancement of access by whanau for customary use and cultural purpose, <u>if on private land in agreement with the landowner</u>; and</i> (b) any consequential amendments required as a result of the relief sought.
Part 2- District Wide Matters – Historical and Cultural Values – SASM – Sites and Significance	55	Support in part	<p>Federated Farmers supports this policy as it stands. Putting aside any issues with the accuracy of the schedule it is important to ensure the rules are linked to SASM-SCHED6 to provide certainty and focus limited resources.</p> <p>Protection of these sites for cultural values needs to be not funded by the private landowners, adequate funds need</p>	<p>Federated Farmers seeks the following relief:</p> <ul style="list-style-type: none"> (a) the addition of policy SASM – P2 so it read as the following: <i>‘Recognise the significance to Kati Huirapa of the wahi tupuna areas listed in SCHED6 – Sites and Areas of Significance to Kati Huirapa and Protect the identified</i>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
to Māori – Policies – P6			made available to ensure that these sites that are pinpoint identified can be protected. Federated Farmers urges the council to recognise that farms still need to be able to operate economically around these SASM's	<i>values of these areas by avoiding significant adverse effects of activities in, or in close proximity to, wahi tupuna areas on the connections of Kati Huirapa to these areas and the ability of the areas to support taoka species and mahika kai, <u>unless there is already a pre-existing use of the land which has minimal or no effect on the site. Existing use is always taken into consideration when protecting the sites.</u></i> (b) any consequential amendments required as a result of the relief sought.
Part 2- District Wide Matters – Historical and Cultural Values – SASM – Sites and Significance to Māori – Policies – P7	56	Strongly Support	Federated Farmers support the SASM – P7 as it stands. We seek that once sites are identify of their exact location then they can be protected and enhanced for future generation to enjoy. We urge this be done in collaboration with the landowner and hapu, as relationships can be formed in the protections of SASM. Council should make available funds to protects these sites. This should not be something that comes at the cost of the private landowner. Non-regulatory methods should be the preference.	Federated Farmers seeks the following relief: (a) the retention of SASM – P7 as currently written or with wording of similar intent; and (b) any consequential amendments required as a result of the relief sought.
Part 2- District Wide Matters – Historical and Cultural Values – SASM – Sites and Significance to Māori – Policies – P8	57	Support in part	Federated Farmers supports the policy as it stands. Support for promoting awareness and understanding of sites; however it looks as though it will only be implemented though a regulatory consent application framework, which should be the last option - not first and only. Non-regulatory methods should be the preference. Accidental discovery of unrecorded heritage or cultural sites can be worrying for landowners. Unknown costs of having to get an archaeologist, heritage or cultural expert in to assess the site, unknown cost and time delay of having to obtain a resource consent in order to complete	Federated Farmers seeks the following relief: (a) the addition of policy SASM – P8 so it read as the following: <i>2. an accidental discovery protocol is prepared and adopted for any earthworks <u>and assist resource users conducting activities near recorded sites and in the event of a discovery of unrecorded sites.</u></i> (b) any consequential amendments required as a result of the relief sought.

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
			<p>the works started before the discovery, and unknown outcome of a resource consent application can all contribute to a view that heritage or cultural sites are a liability and a burden on the discoverer. We do not think this outcome serves anyone well.</p> <p>An option that can be provided as a management tool that should be included is a cost-sharing between the regulatory body and individual resource users. Councils could offer to waive a resource consent fee in the event of accidental discovery of a heritage site during works, and a cost-share arrangement for an archaeological or cultural impact assessment. Including this as an option will remind landowners that council understands their concerns and may prevent negative consequences that can sometimes occur.</p>	
Part 2- District Wide Matters – Historical and Cultural Values – SASM – Sites and Significance to Māori – Rules – R1	58	Oppose in part	<p>Federated Farmers is concerned over policies that seek to restrict certain activities and farm practices on private property. Care needs to be taken when developing policies for district plans, that the rights of private landowners to carry out lawful activities are not unnecessarily restricted or prohibited through the council seeking to protect SASM, without proper identifications of sites, seems premature.</p> <p>Policies in the proposed district plan should be consistent with policies contained in national policy instruments and national environmental standards. The council also needs to recognise that for the rural sector to operate effectively, the sector requires an environment which is fair and justifiable. To place regulation of private property that is far-reaching is unjustifiable if actual key areas are not identified. It is unjust for council to create regulation of</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the addition of SASM-R1, PER-1 so it read as the following: <i>'The activity is either: earthworks, including those associated with and under new buildings/structures and those necessary for the installation of infrastructure/ utilities, do not exceed a maximum area of 750m²-1000m², recognising the needs of rural structures; earthworks for the purpose of maintaining existing roads, tracks, or natural hazard mitigations works, and area within the footprint or modified ground comprised by existing road, track, <u>animal welfare needs</u>, or natural hazard mitigation works; We oppose any rules in the wahi tapu and wai tapu overlayers unless areas can be more clearly identified.</i></p>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
			<p>large swads of areas which the closets SASM could be 3km away.</p> <p>Federated Farmers mostly supports the proposed permitted activities PER-1 – PER 4, with the exemption of wording changes. As written the permitted activities under this rule will stifle farm management and growth, create conditions which put the health and safety of those on the farm at risk, as well as stock. The permitted activity 1 proposed creates unworkable condition for earthworks around new/existing structures. Many heritage woolshed/farm sheds from colonial era have a square footage including yards of greater than 750m². As a council which wants to protect both its colonial and whenua heritage this is a fine balance. The permitted activity proposed would place far reaching restrictions of farm buildings which are needed to safely operate their business. We urge the council to have approached farmers in the drafting of these rules to get their views, and into the future.</p>	<p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 2- District Wide Matters – Historical and Cultural Values – SASM – Sites and Significance to Māori – Rules – R2	59	Oppose in part	<p>Federated Farmers is concerned about the added regulation that seeks to restrict farm activities. Council when developing policy needs to consult those that are affected in the drafting process. Having a heavy – handed approach when the plan is proposed is disappointing.</p> <p>We have issues with the accuracy of the overlays and where sites are located. Without definitive locations in the wahi taoka overlay, we find the rules detrimental to the operations of a farm. We urge the council to go back to Kati Huirapa and ask for clarification on where sites are inside certain layers. This gives farmers a better idea on what to protect and work with Kati Huirapa to put protections, enhance the area, and create relationships</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the addition of SASM-R2, PER-1 so it read as the following: <i>For buildings or structures located outside of the residential zones, Commercial and mixed use zones, Industrial; zones or Port Zone, the following limitations apply:</i></p> <ol style="list-style-type: none"> 1. <i>The maximum height of buildings and structures does not exceed 5m <u>10m</u> above ground level; and</i> 2. <i>Buildings and structures are not located within 20m vertical or 100m</i>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
			with Kati Huirapa. When an overlay covers 100% of privately owned land with no pinpointed location of significant, this is concerning.	<p><i>horizontal of any ridgeline, <u>unless it is a pre-existing structure, or a new structure with little to no impact on the aesthetics of the environment;</u> and</i></p> <p>3. <i>Buildings and structures are not located at any point above 900m <u>1100m</u> above sea level; and</i></p> <p>4. <i>The maximum footprint of any building or structure does not exceed 300m².</i></p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 2- District Wide Matters – Historical and Cultural Values – SASM – Sites and Significance to Māori – Rules – R3	60	Support in part	<p>Federated Farmers supports the inclusion of R3 into the proposed plan. We acknowledge the importance of protecting and conserving native bush for future generations to enjoy. Many farmers across your district already do so for amenity or ecological purposes.</p> <p>However, we would like to see minor amendments to reflect the need to remove native bush on land under existing use rights for clearance of regrowth.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the addition of SASM-R3, PER-6 so it read as the following: <i>The indigenous vegetation clearance is necessary in the course of removing pest plants and pest animals in accordance with any regional pest management plan or the Biosecurity Act 1993, or where this occurs as part of indigenous biodiversity restoration or enhancement, or exercising existing use rights.</i></p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 2- District Wide Matters – Historical and Cultural Values – SASM – Sites and Significance to Māori – Rules – R4	61	Support in part	<p>Federated Farmers supports this rule, with the addition of minor changes to reflect property ownership on private land.</p> <p>Federated Famers also acknowledges the importance of cultural events are important to occur, for strengthen bonds, education, and culture among people.</p> <p>To have a blanket rule, without taking into consideration private ownership would be neglectful. Instead of</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the addition of SASM-R4, PER-1 so it read as the following: <i>Any temporary event where there is limited to a cultural event undertaken in accordance with tikanga, <u>if required on private property consent from private landowner is gained prior to the event occurring.</u></i></p>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
			regulation we would urge the development of relationships between iwi and local landowners where sites are located.	(b) any consequential amendments required as a result of the relief sought.
Part 2- District Wide Matters – Historical and Cultural Values – SASM – Sites and Significance to Māori – Rules – R5	62	Support in part	Federated Farmers supports the inclusion of Mining and Quarrying, however, seeks that farm quarry is removed from the inclusion in the Mining and Quarrying. Farm quarriers are small and are used for on farm purposes that do not have the same impact on the environment as commercial mining operations.	Federated Farmers seeks the following relief: (a) the addition of SASM – R5 so it reads as the following: <i>The mining and/or quarrying do not exceed a maximum area of 750m² in commercial mining operations, excluding rural on-farm mines; and</i> (b) any consequential amendments required as a result of the relief sought.
Part 2- District Wide Matters – Historical and Cultural Values – SASM – Sites and Significance to Māori – Rules – R6	63	Strongly Oppose	Federated Farmers seeks the removal of unreasonable bureaucratic restrictions of land use and management. Farms who have been farming stock on their land for generations. Most farmers in the district have an intergenerational approach to land management, they want/need to protect their land for their future generations to inherit. Without the identification of pin-pointed sites of significance, it is impudent to allow for whole farms to have restrictions on their land. Federated Farmers seeks the development of a relationship between runanga and private landowners to locate, identify and protect sites, rather than bureaucratic top-down approach from council. Federated Farmers acknowledges the importance to protect former pa sites, rock art bring protected.	Federated Farmers seeks the removal from this chapter. Intensively farmed stock should not be restricted under the current overlays, until more information has been provided by the runanga, to properly identify the sites of significance.
Part 2- District Wide Matters –	64	Oppose	Federated Farmers seeks to oppose this rule. It is important to allow small subdivisions to occur on farms.	Federated Farmers seeks the following relief;

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Historical and Cultural Values – SASM – Sites and Significance to Māori – Rules – R7			Intergenerational farms need to subdivide to allow the building of an additional dwelling to allow multiple generations to live on the farm is common. Under this propose rule, it would not allow for the subdivision of land, restricting the ability for generations to live alongside one another.	<p>(a) the addition of SASM – R7 so it reads the following: <i>Subdivision occurring in rural areas where housing is required on intergenerational farms, farm housing for employees, or as required for the operations for safe farm management housing.</i></p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 2- District Wide Matters – Historical and Cultural Values – SASM – Sites and Significance to Māori – Rules – R8 & 9	65	Strongly oppose	<p>Federated Farmers seeks to oppos restrictions of shelterbelts, woodlots, or plantation forestry.</p> <p>Restrictions of shelterbelts are seen as heavy-handed approach taken by council, without the consideration of implications these will on farm operations, especially the welfare of stock.</p> <p>We urge the development of relationships between runanaga and private landowners to develop a relationship on what/type of shelterbelt plantation can occur in the wahi tapu overlay, to have a blanket regulation over the sites is underdeveloped policy. Council does not need to regulate this process.</p>	<p>Federated Farmers seeks the following relief;</p> <p>(a) the addition of SASM – R8 & 9 so it reads the following: <i>the addition of shelterbelts for the protection of crops, welfare of animals, creating ecological habitats on farm in consultation with iwi through a relationship to which trees can be planted around these sites of significance.</i></p> <p>(b) Any consequential amendments required as a result of the relief sought.</p>
Natural Environment Values				
Ecosystems and Indigenous Biodiversity				
Part 2 – District Wide Matters – Natural Environment Values – ECO-Ecosystems and Indigenous Biodiversity – Overview	66	Support in part	<p>Federated Farmers has a significant interest in this chapter of the proposed district plan. The preservation of indigenous ecosystems and biodiversity has and will continue to create tensions between private landowners, Iwi and Councils.</p> <p>The approach taken to indigenous ecosystems and biodiversity is that landowners should it as a valuable asset rather than a hindrance. As part of this, it is important that activities such as lambing, calving, shelter, water supply and</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the retention of objectives ECO-01,ECO-02, and ECO-03 as proposed, or with wording to similar effect; and</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
			takes, fencing, access and works for access and fire breaks are permitted throughout the plan.	
Part 2 – District Wide Matters – Natural Environment Values – ECO-Ecosystems and Indigenous Biodiversity – Objectives	67	Support	Federated Farmers supports objectives ECO-01, ECO-02, and ECO-03 for Ecosystems and indigenous biodiversity.	Federated Farmers seeks the following relief: (a) the retention of objectives ECO-01, ECO-02, and ECO-03 as proposed, or with wording to similar effect; and (b) any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Natural Environment Values – ECO-Ecosystems and Indigenous Biodiversity – Policies	68		Federated Farmers supports the priority that has been given to Significant Natural Areas in Rules ECO-P1, ECO-P2, and ECO-P5. We are also supportive of many of the suggested non-regulatory tools in which Council has suggested improves biodiversity outcomes for the district. Policy related to active management of pest plants and animal is also supported as with increased native corridors risks creating pathways for pest species to move around rural areas. There are concerns that the policies do not provide for existing activities to continue.	Federated Farmers seeks the following relief: (a) the addition of new policy ECO-P2 that reads: <u>Provide recognition for grazing and farming existing activities that have not increased in their scale or intensity of effects from commencement date of the plan.</u> or with wording to similar effect; and (b) any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Natural Environment Values – ECO-Ecosystems and Indigenous Biodiversity – Rules 2,3,4,6,7	69	Support	Federated Farmers supports rules 2,3,4,6,7 currently drafted in the proposed district plan.	Federated Farmers seeks the following relief: (a) the retention of the rules 2,3,4,6,7 as proposed, or with wording to similar effect; and (b) any consequential amendments required as a result of the relief sought.

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Part 2 – District Wide Matters – Natural Environment Values – ECO-Ecosystems and Indigenous Biodiversity – Rules – R1- Part 2	70	Oppose in part	<p>Federated Farmers opposes in part the rule as it stands with permitted clearance within 50m of any wetland. The setback is excessive. NESFW 2020 only requires 10m. Why the district council is requiring five times the setback is unclear and unjustified.</p> <p>Federated Farmers support PER-2 and PER-4D, which does provide farmers the opportunity for clearance for improved pasture. We urge the council to be wary about other submissions to have mapped improved pasture as what has occurred in the Mackenzie District. It is expensive and unnecessary for councils.</p>	<p>Federated Farmers seeks the following relief;</p> <p>(a) the removal of the 50m setback from this rule, or with wording to a similar effect; and</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 2 – District Wide Matters – Natural Environment Values – ECO-Ecosystems and Indigenous Biodiversity – Rules – R5	71	Oppose	<p>Federated Farmers oppose R5 as it is currently drafted in the proposed district plan. This rule goes against routine maintenance, repair and replacement for all existing lawful activities which should be permitted, not restricted discretionary. This rule also has a type, which states ‘Activity status where compliance not achieved: Restricted discretionary’. We assume this should be discretionary to align with the two activities stated in the rule.</p>	<p>Federated Farmers seeks the following relief;</p> <p>(a) the removal of the rule, as it is already a lawful activity. Fix the typo in the plan to read more clearly.</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Natural Character				
Part 2 – District Wide Matters – Natural Environment Values – NATC – Natural Character – Overview	72	Support in part	<p>Natural character is a matter that Federated Farmers and its members are heavily invested in. This is a significant proportion of natural character located in the Timaru District and which has been preserved on farmland throughout the district.</p> <p>Our members are constantly improving riparian margins and natural character on their land through planting, fencing, and retiring land with natural character from use. All this is done largely at their expense. Federated Farmers</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the addition of a sentence in the overview for natural character that recognises that some activities will have a functional need to be located within an area of natural character; and</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
			<p>supports the use non-regulatory measures to assist landowners to continue this journey.</p> <p>It is important that the Council recognises and provides for in the district plan for activities that have a functional need to be located within an area of natural character. These activities are required to be located next to the resources that they utilise and cannot be located anywhere else. These activities need to be provided for as they form part of a working landscape.</p> <p>Farmland is intrinsically part of the natural character and will assist in its preservation and protection from inappropriate subdivision, use and development, we urge that this is recognized by council. Rural zone provisions will manage the scale and density of buildings, earthworks, forestry, and subdivision, which are part of existing farming land uses that must be provided for as a right in the district plan.</p> <p>The Council appears to have taken the approach that all existing activities will adversely impact on areas of natural character without considering that these areas may be located on private property and have existing activities occurring in them.</p>	
Part 2 – District Wide Matters – Natural Environment Values – NATC – Natural Character – Objectives	73	Support	Federated Farmers supports the retention of the objectives as written under section 6(a) of the Resource Management Act 1991 which requires the protection of natural character from inappropriate subdivision, use, development.	Federated Farmers seeks the retention of the proposed objectives for NATC-01, or amended wording that has the same intent.

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Part 2 – District Wide Matters – Natural Environment Values – NATC – Natural Character – Policies – NATC-P1	74	Support	Federated Farmers supports the retention of this policy as reads. It is important that natural character values are protected and recognized. Many farmers around the district recognise this as well through land management on their properties.	Federated Farmers seeks the retention of this proposed policy, or amended wording that has the same intent.
Part 2 – District Wide Matters – Natural Environment Values – NATC – Natural Character – Policies – NATC-P2	75	Support	Federated Farmers supports the retention of this policy as reads. It is important that these sites are restored and enhanced to protect the natural character of the area.	Federated Farmers seeks the retention of this proposed policy, or amended wording that has the same intent.
Part 2 – District Wide Matters – Natural Environment Values – NATC – Natural Character – Policies – NATC-P3	76	Support in part	Federated Farmers supports the retention of this policy as it reads with minor amendments. It is important that council recognises the role the private landowner has had in the management of these areas of natural character, well before council started regulating it. Federated Farmers does not think the incentives go further enough for private landowners and thinks that a rates relief would be more beneficial than having expert advise, as many landowners in the rural sector pay significant amounts of rates already to council. Many farmers who hold intergenerational for their lands and will want to protect the land for generations who come after them. Federated Farmers would also like to thank the council for including incentives to farmers for doing the right thing.	Federated Farmers seeks the following relief; <ul style="list-style-type: none"> (a) the addition of NATC-P3 so it reads the following; <i>Encourage and support the restoration and enhancements of natural character values through such measures as:</i> <ol style="list-style-type: none"> 1. <i>reducing or waiving consent application costs; and/or</i> 2. <i>providing funding, grants and other incentives; and/or</i> 3. <i>providing expert advise;</i> 4. <u><i>providing significant rates relief.</i></u> (b) any consequential amendments required as a result of the relief sought.

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Part 2 – District Wide Matters – Natural Environment Values – NATC – Natural Character – Policies – NATC-P5	77	Support in part	<p>Federated Farmers seeks the relief of this rule to have the addition of the vegetation clearance to remove pest species, alongside exotic species. The policy needs to be developed to have a wider scope than what is being prescribed. By having a wider scope, it allows for the grazing/mowing of grasses to reduce the fire risk and other exotic species which suppress biodiversity, providing cover for predators. Whilst some of this is provided for in R1, ideally, we would like to see this covered in the scope of this policy.</p> <p>Federated Farmers would also like to see point 5 in the policy extended to include vegetation clearance. We are concerned that the council is only providing for earthworks, when vegetation clearance is an anticipated process in relation to the maintenance and repair of fences, tracks etc.</p>	<p>Federated Farmers seeks the relief of the following;</p> <p>(a) the addition of NATC-P5 so it reads the following; <i>Provide for activities in riparian margins which are appropriate for safety, enhancement, wellbeing or customary reasons, by enabling:</i></p> <ol style="list-style-type: none"> 1. <i>activities which are undertaken by a local authority for the purpose of natural hazard mitigation works, and where possible, any adverse effects on natural character are minimised;</i> 2. <i>vegetation clearance to remove pest <u>and/or exotic</u> species</i> 3. <i>vegetation clearance for mahika kai purposes;</i> 4. <i>planting of indigenous species that is for the purpose of restoration and enhancement activities; and</i> 5. <i><u>Vegetation clearance and earthworks</u> that are for the purpose of maintenance and repair of existing fences, tracks, roads or for limited new fencing and tracks.</i> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 2 – District Wide Matters – Natural Environment Values – NATC – Natural Character – Rules – Overview	78	Support	<p>Federated Farmers supports the rules proposed and seeks to retain them as written. Federated Farmers commends the council for finding a balance of between conservation and also current land uses working alongside one another in this chapter.</p> <p>We do ask the council to clarify NATC-R4 PER1, which states 'the fence is a post and wire fence only'. We would like clarity to see if this includes rabbit-proof netting as well.</p>	<p>Federated Farmers seeks the retention and clarification of NATC-R4 PER1 of these proposed rules, or amended wording that has the same intent.</p>
Natural Features and Landscapes				

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Part 2 – District Wide Matters – Natural Environment Values – NFL – Natural Features and Landscapes – Overview	79	Oppose	<p>While Federated Farmers supports the protection of outstanding natural features and landscapes, it considers that this must be done through the appropriate identification of the features and landscapes as well as with consultation with the impacted landowners who are the ones with the role of protecting such areas.</p> <p>Rural landowners are generally the ones who have preserved the landscapes and features on their properties around their working rural environment which is why such areas still exist today. If it was not for the landowners and the ability to graze around such areas the land would not be economically viable resulting in inappropriate subdivision, use and development to fund such land ownership.</p> <p>Federated Farmers strongly opposes placing restrictions on farming activities within outstanding natural landscapes and features. Farming activities are appropriate land use activities that still preserves the character and amenity value of such areas of significance.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the amendment of the overview to recognise and acknowledge the role that landowners have played and still play in the preservation of outstanding natural landscapes and features; and</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 2 – District Wide Matters – Natural Environment Values – NFL – Natural Features and Landscapes – Objectives – NFL-01 and NFL-02	80	Support	Federated Farmers seek to support the objectives as written in the proposed district plan.	<p>Federated Farmers seeks following relief;</p> <p>(a) the retention of the proposed objectives for NFL-01 and NFL-02, or amended wording that has the same intent.</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 2 – District Wide Matters – Natural	81	Support	Federated Farmers seek to support the policies NFL-P1, and NFL-P3 as written in the proposed district plan.	Federated Farmers seeks following relief;

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Environment Values – NFL – Natural Features and Landscapes – Policies – NFL-P1, and NFL-P3.				(a) the retention of the proposed objectives for NFL-P1, and NFL-P3, or amended wording that has the same intent. (b) any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Natural Environment Values – NFL – Natural Features and Landscapes – Policies – NFL-P2.	82	Support in part	Federated Farmers seeks relief of the removal of the word non-intensive from the policy. Should there already be intensive primary production in a VAL or outstanding natural features or landscape, the council should not be able to cease the activity from continuing. Council should note especially if the landscape still merits the classification.	Federated Farmers seeks the following relief; (a) the amendment of the policy NFL-P2 so it reads the following, or has wording of the same intent. <i>'Enable certain activities in Visual Amenity Landscapes, Outstanding Natural Features and Outstanding Natural Landscapes, including existing non-intensive primary production, small scale earthworks, maintenance of existing tracks and fences, and underground utilities, that are consistent with.'</i> (b) any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Natural Environment Values – NFL – Natural Features and Landscapes – Policies – NFL-P4	83	Support in part	Federated Farmers seeks the amendment to policy NFL-P4. The policy needs to focus on mitigating inappropriate subdivision, use and development within the two layers while recognising certain activities can occur as long as they are appropriate for the areas, within reason.	Federated Farmers seeks the following relief: (a) the amendment of policies NFL-P4 to achieve consistency with section 6 of the Resource Management Act 1991 and to recognise the need to allow appropriate subdivision, use and development; and (b) amend policy NFL-P4 to read: <i><u>Avoid Mitigate inappropriate subdivision, use and development within outstanding natural features and outstanding natural landscapes, within reason, not to stifle development that area not provided in NFL-P2, unless it:</u></i>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
				<p>1. demonstrates how the identified values and characteristics of the outstanding natural landscapes and outstanding natural features described in SCHED8 – Schedule of outstanding natural landscapes and SCHED9 – Schedule of outstanding natural features will be protected; and</p> <p>2. is located within a part of the outstanding natural feature or outstanding natural landscape that has capacity to absorb change; and</p> <p>3. can be visually integrated into the landscape and will not break the skyline or ridgelines; and</p> <p>4. will maintain natural landforms, natural processes and vegetation areas and patterns,</p> <p>Or wording to similar effect; and</p> <p>(c) any consequential amendments required as a result of the relief sought.</p>
Part 2 – District Wide Matters – Natural Environment Values – NFL – Natural Features and Landscapes – Rules – NFL-R1	84	Support in part	Federated Farmers supports the policy in part, but seeks the removal of PER-2. It creates unnecessary regulation for the farmer. Instead we hope through the addition of water-management and allocation in their farm plan’s would be more beneficial and that farm plans already take into consideration the natural features and landscapes when planning for stock. For some farms a blanket ban would affect a whole farm operation and its existing use.	<p>Federated Farmers seeks the following relief:</p> <p>(a) the amendment of the NFL-R1 to remove the over-regulatory clause about irrigation structures.</p> <p>PER-1</p> <p><i>The building or structure is either:</i></p> <p>1. a farm building or structure associated with an existing non-intensive primary production, including residential units permitted in the applicable zones, and including earthworks associated with the building/structure; or</p> <p>2. a public amenity building, including earthworks associated the building; or</p> <p>PER-2</p> <p><i>The structure is an irrigator that is not a travelling, mobile or pivot irrigator; and</i></p>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
				<p>PER-3 The activity does not require the clearance of any indigenous vegetation.</p> <p>PER-4 NFL-S1, NFL-S2,</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 2 – District Wide Matters – Natural Environment Values – NFL – Natural Features and Landscapes – Rules – NFL-R2, to NFL-R10	85	Support	Federated Farmers seek to support the rules NFL-R2 to NFL-R10 as written in the proposed district plan.	Federated Farmers seeks following relief; (a) the retention of the proposed rules from NFL-R2 to NFL-R10, or amended wording that has the same intent. (b) any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Natural Environment Values – NFL – Natural Features and Landscapes – Rules – NFL-R2	86	Oppose	<p>Federated Farmers seeks the following relief for NFL-R2,2 VAL overlay. The rule is very similar to that already outlined in the previous chapter. VAL (amenity landscapes) are a matter that is covered within s7(c) of the RMA. These are matters that councils shall have particular regard to. However not a matter deemed to be of national significance as applied to outstanding natural features and landscapes.</p> <p>Planting restrictions for these secondary landscapes should not be provided with similar levels as that is provided for outstanding natural features and landscapes in this proposed district plan.</p>	Federated Farmers seeks following relief; (a) the deletion of this proposed section in R2. (b) any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Natural	87	Support in part	Federated Farmers seeks clarification with NFL-R4 PER 1. The rule states that ‘the fence is a post and wire fence’. Clarification is needed if the wire fence includes netting.	Federated Farmers seeks the following relief;

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Environment Values – NFL – Natural Features and Landscapes – Rules – NFL-R4			Netting fences are used for deer but also used for pest proofing land from rabbits and wallabies.	(a) the retention of the propose rule NFL-R4, with clarification given in the rule around the use of ‘post and wire fence’ and if that includes netting fencing. (b) any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Natural Environment Values – NFL – Natural Features and Landscapes – Rules – NFL-R5	88	Support in part	Federated Farmers has concerns with the outstanding natural features and landscapes overlay. There are no provisions for the planting of shelterbelts in the outstanding natural landscapes. Given that outstanding natural landscapes include the Rangitata catchment where there are fierce nor westers that blow through. It is concerning that council is not providing for shelterbelts could result in increased soil erosion and animal welfare issues. Requiring a consent for planting of shelterbelts is inappropriate, especially as existing primary production is enabled as per Policy 2.	Federated Farmers seeks the following relief; (a) the retention of the proposed rule as drafted with the inclusion shelterbelts as a permitted activity in the ONFL overlay as a way for soil and stock management. (b) any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Natural Environment Values – NFL – Natural Features and Landscapes – Rules – NFL-R6	89	Oppose	Federated Farmers seeks the following relief in NFL – R6 PER 2. This rule does not allow primary production to adopt to new technology or innovation or adapt to changing market patterns and customer preferences. It also stifles the ability of landowners to respond to and become more resilient against other factors such as climate change. The proposed rule locks in the current farming practice. Normal primary production activities should be able to continue without hindrance by over-regulation. Having a status as either permitting or non-complying is disproportionate. Restricted Discretionary would be more reasonable.	Federated Farmers seeks the following relief; (a) the removal of the rule as drafted in the proposed district plan. (b) any consequential amendments required as a result of the relief sought.

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Part 2 – District Wide Matters – Natural Environment Values – NFL – Natural Features and Landscapes – Rules – NFL-R8	90	Oppose in part	<p>Federated Farmers seeks the following relief that farm tracks should be removed from this rule as their impact on the landscape will be far less than that of a new road, walking/cycle track.</p> <p>If farm tracks remain in this rule, then VAL's and outstanding natural features and landscapes are receiving the same protection. Farm tracks in VAL's should be permitted or controlled at most.</p>	<p>Federated Farmers seeks the following relief;</p> <p>(a) the retention of the proposed rule with the removal of farm tracks or amended wording that has the same intent.</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 2 – District Wide Matters – Natural Environment Values – NFL – Natural Features and Landscapes – Rules – NFL-S3	91	Oppose	<p>Federated Farmers seeks relief on this standard as the council has a role to managing the effects of buildings on landscapes, not confining them to one location. The council could change the wording of this standard to similar wording as The Queenstown Lakes District Plan which acknowledges farming and enables activities, especially with outstanding natural landscapes, which most of their district is comprised of.</p> <p><i>“21.2.1 Objective – A range of land uses, including farming and established activities, are enable while protecting, maintaining and enhancing landscape, ecosystem services, nature conservation and rural amenity values.</i></p> <p><i>21.2.1.2 Policy – Allow farm buildings associated with landholdings of 100 hectares or more in area while managing effects of the location, scale and colour of the buildings on landscape values.”</i></p>	<p>Federated Farmers seeks the following relief;</p> <p>(a) the deletion of the standard or amend the standard as following the QLDC wording which enables activities such as farming in the district.</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Public Access				

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Part 2 – District Wide Matters – Natural Environment Values – PA – Public Access – Overview	92	Oppose in part	<p>The District Plan needs to be clear that access is not available across private land unless it is with permission from the landowner. The landowner should not be compelled by the District Plan to always provide access across what is essentially their business and home.</p> <p>Many rural landowners, particularly coastal or riparian margin landowners, have encounters with unwelcome trespassers, some with dogs, that are disruptive to their farming operations, create security issues for themselves and their stock, have put themselves into dangerous situations, or created nuisance effects like littering or human waste.</p> <p>It is appropriate and legal to limit access across private property when this access will be unsafe or will disrupt farming activities, such as when tree felling or earthmoving is occurring, or during harvest or lambing activities.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the amendment of the overview so that it addresses the issue of public access across private property and the need to ensure that this access is provided with the agreement of the landowner where it is practicable to provide that access; and</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 2 – District Wide Matters – Natural Environment Values – PA – Public Access – Objectives	93	Support in part	<p>Federated Farmers supports objectives PA-O1 and PA-O2 as they are currently drafted in the proposed district plan. However, there is a need for an additional objective to be included that provides recognition for private property rights as well as the additional impacts public access may also have on the amenity value of selected landscapes and areas.</p> <p>The landowner’s private property rights are a key area of focus which needs to be considered within this chapter.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the retention of objectives PA-O1 as currently drafted with wording to similar effect; and</p> <p>(b) the addition of a new objective PA-O2 that reads as follows: <u><i>Practical and safe public access to and along the margins of lakes and rivers and the coastal environment is provided in a way that respects private property and does not result in adverse effects on natural character, landscape, indigenous biodiversity, historical heritage, or cultural values.</i></u> or wording to similar effect; and</p> <p>(c) any consequential amendments required as a result of the relief sought.</p>
Part 2 – District Wide Matters – Natural Environment	94	Support in part	<p>Federated Farmers supports policies PA-P1 to PA-3 as they are currently drafted in the proposed district plan.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the retention of policies PA-P1 to PA-P3 as currently drafted with wording to similar effect; and</p>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Values – PA – Public Access – Policies			The policy section needs to include private property as a consideration when providing public access to ensure that it does not cause damage or create security risks. As a group, farmers provide more public access across their private property than other landowners (such as residential or industrial). Farmers are familiar with the adverse effects that result from public access such as rubbish, weed incursions and nuisance effects on their homes and places of work. The provision of public access also provides for weed incursions which are of particular concern with Chilean Needle Grass and Yellow Bristle Grass now in the region, which can create significant damage to livestock welfare and pasture quality.	(b) the addition of a new policy PA-P4 that reads as follows: <u>To provide information and education to the public regarding where public access is available, and that access over private land is only by the permission of the landowner.</u> or wording to similar effect; and (c) any consequential amendments required as a result of the relief sought.
Versatile Soils				
Part 2 – District Wide Matters – Natural Environment Values – VS – Versatile Soils – Overview	95	Support	Federated Farmers supports the chapter as drafted for the proposed district plan. It is important that council has recognised the importance of versatile soils in the primary industry and its needs. Federated Farmers commends the council on this chapter.	Federated Farmers seeks following relief; (a) the retention of the proposed chapter for versatile soils, or amended wording that has the same intent. (b) any consequential amendments required as a result of the relief sought.
Subdivision				
Part 2 – District Wide Matters – Natural Environment Values – SUB – Subdivision – Overview	96	Support in part	Federated Farmers believes that council subdivision and development policies and planning should provide for managed growth in rural communities. While acknowledging that the loss of productive land can impact on the region’s economy, there is also a need to recognise that farmers undertake small lot subdivision to provide for farm succession, dispose of surplus dwellings and for providing on-farm accommodation for employees. There should also needs to be acknowledgement that considered well managed growth in rural communities provides for	Federated Farmers seeks the following relief: (a) the amendment of the overview to the subdivision chapter to acknowledge the need to provide a framework for the managed growth of rural communities; and (b) the expansion of the issue of reverse sensitivity in the rural environment so that it is addressed in detail and clearly sets out why the issue needs to be acknowledged and addressed; and (c) any consequential amendments required as a result of the relief sought.

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
			<p>diversity and vibrancy in rural areas, sustains essential community infrastructure, and provides employment flexibility and opportunities.</p> <p>One major concern with subdivision in rural areas is the issue of reverse sensitivity. Rural residential activities are often incompatible with rural production activities. Federated Farmers advocates for reverse sensitivity protection for rural land use so that the introduction of residential activities in rural areas will not negatively impact on the current use of rural land for production purposes. Federated Farmers wants to ensure that any objectives, policies, and relevant rules consider and mitigate the potential for reverse sensitivity issues to arise, where practical.</p>	
Part 2 – District Wide Matters – Natural Environment Values – SUB – Subdivision – Objectives	97	Support	Federated Farmers supports the objectives SUB-O1 to SUB-O5 as they are drafted in the proposed district plan. In particular we support the recognition of highly productive land and the reverse sensitivity issues that arise from subdivision in rural areas.	Federated Farmers seeks the following relief: <ul style="list-style-type: none"> (a) the retention of objectives SUB-O1, SUB-O2, SUB-O3, SUB-O4, and SUB-O5 as currently drafted in the subdivision chapter or with wording with similar effect; and (b) any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Natural Environment Values – SUB – Subdivision – Policies – SUB-P1 to SUB-P6	98	Support	Federated Farmers supports the policies SUB-P1 to SUB-P6 as they are drafted in the proposed district plan.	Federated Farmers seeks the following relief: <ul style="list-style-type: none"> (a) the retention of policies SUB-P1 to SUB-P6 as currently drafted in the subdivision chapter or with wording with similar effect; and (b) any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Natural	99	Oppose in Part	Federated Farmers raises concerns around the right of public access. The landowner should not be compelled by	Federated Farmers seeks the following relief: <ul style="list-style-type: none"> (a) the amendment of the policy SUB-P7 so that it addresses the issue of public access across private property and the need

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Environment Values – SUB – Subdivision – Policies – SUB-P7			the District Plan to always provide access across what is essentially their business and home.	<p>to ensure that this access is provided with the agreement of the landowner where it is practicable to provide that access to public land if access cannot be gained through public land in a safe manner; and</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 2 – District Wide Matters – Natural Environment Values – SUB – Subdivision – Policies – SUB-P14 to SUB-P15	100	Support	Federated Farmers supports the policies SUB-P14 to SUB-P15 as they are drafted in the proposed district plan.	<p>Federated Farmers seeks the following relief:</p> <p>(a) the retention of policies SUB-P14 and SUB-P15, as currently drafted in the subdivision chapter or with wording with similar effect; and</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 2 – District Wide Matters – Natural Environment Values – SUB – Subdivision – Rules – SUB-R1 to SUB-R3	101	Support	Federated Farmers supports the rules SUB-R1 to SUB-R3 as they are drafted in the proposed district plan.	<p>Federated Farmers seeks the following relief:</p> <p>(a) the retention of rules SUB-R1 and SUB-R3, as currently drafted in the subdivision chapter or with wording with similar effect; and</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 2 – District Wide Matters – Natural Environment Values – SUB – Subdivision – Standards – SUB-S1	102	Support in part	<p>Federated Farmers supports rule SUB-R3 in general but does support the proposed 40ha rural production-controlled standard in SUB-S1. The 40ha requirement is overtly limiting and would require farmers to sacrifice more productive land for subdivision. This will leave less productive farmland on the working farm and more productive land on a smaller lifestyle property.</p> <p>We seek that the 40ha requirement in SUB-S1 is amended to 20ha. This will ensure that landowners have suitable</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the amendment of the minimum allotment size for rural production land in SUB-S1 from 40ha to 20ha; and</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
			options available to react to economic, environmental and farm succession changes as required.	
Part 2 – District Wide Matters – Natural Environment Values – SUB – Subdivision – Standards – SUB-S2 to SUB-S8	103	Support	Federated Farmers supports the Standards SUB-S2 to SUB-S8 as they are drafted in the proposed district plan.	Federated Farmers seeks the following relief: (a) the retention of standards SUB-S2 and SUB-S8, as currently drafted in the subdivision chapter or with wording with similar effect; and (b) any consequential amendments required as a result of the relief sought.
Coastal Environment				
Part 2 - District Wide Matters – General District-Wide Matters – CE- Coastal Environment - Overview	104	Oppose	Federated Farmers has identified that both coastal environment and coastal hazard layers have captured areas of rural farmland. It is important that the Council provides for everyday agricultural activities to occur in the coastal environment, many of which already do. The amount of land captured is small and would allow the Council to engage individually with each landowner to provide necessary education and information on the particular challenges and restrictions placed on their land. Federated Farmers seeks that the areas of high natural character are deleted from this section as the coastal environment, outstanding natural character and indigenous biodiversity rules are consistent with section 6(a) of the Resource Management Act 1991 in protecting these areas from inappropriate subdivision and development. Without the high natural character layer, the District Plan still meets the Council’s obligations under the New Zealand Coastal Policy Statement as well as the Northland Regional Policy Statement.	Federated Farmers seeks the following relief: (a) the deletion of all references in the coastal environment chapter to high character areas; and (b) any consequential amendments required as a result of the relief sought.

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Part 2 - District Wide Matters – General District-Wide Matters – CE- Coastal Environment – Objectives	105	Support	Federated Farmers supports the inclusion of these objectives in the proposed district plan. We see no need to make any further amendments on these.	Federated Farmers seeks the following relief; (a) the retention of the objectives as drafted, or amended to similar intent; and (b) any consequential amendments required as a result of the relief sought.
Part 2 - District Wide Matters – General District-Wide Matters – CE- Coastal Environment – Policies - CE-R13	106	Oppose	Federated Farmers supports the right of existing farm activities to occur as permitted activities within the coastal environment. We recognise that the majority of the high and outstanding natural character layers capture biodiversity and non-farming land as well as farmland. Federated Farmers wishes to ensure that any existing farming activities and farmland located in these overlays within the coastal environment are permitted to continue. It is not appropriate for the district plan not to provide for existing, lawfully established farming activities to continue in the coastal environment. It is important to ensure that existing farmland is preserved and allowed to continue for future generations with a balance needing to achieve with the maintenance of the existing values formed by the coastal area.	Federated Farmers seeks the following relief: (a) the amendment of rule CE-R13 to provide for existing farming activities (including farm quarries) and farmland as permitted activities within the coastal environment; and (b) many consequential amendments required as a result of the relief sought.
Earthworks				
Part 2 - District Wide Matters – General District-Wide Matters – EW – Earthworks - Objectives and Policies	107	Support	Federated Farmers supports objectives and policies as currently drafted in the proposed district plan.	Federated Farmers seeks the following relief: (a) the retention of objectives and policies as currently drafted or with wording to similar effect; and (b) any consequential amendments required as a result of the relief sought.

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Part 2 - District Wide Matters – General District-Wide Matters – EW – Earthworks – Rules	108	Support	Federated Farmers the rules as currently drafted in the proposed district plan.	Federated Farmers seeks the following relief: <ul style="list-style-type: none"> (a) the retention the rules as currently drafted or with wording to similar effect; and (b) any consequential amendments required as a result of the relief sought.
Part 2 - District Wide Matters – General District-Wide Matters – EW – Earthworks – Standards – EW-S1	109	Support in part	Federated Farmers supports the increase of the maximum earthwork thresholds for the rural production zone of 5000m ³ in volume and 2500m ² in area for all earthworks undertaken on a site in a single calendar year. This would less constrain farmers and the needs they may to do earthworks on their land.	Federated Farmers seeks the following relief: <ul style="list-style-type: none"> (a) the increase of the proposed maximum volume to 5000m³ and maximum area of 2500m² for the rural production zone as set out in standard EW-S1; and (b) any consequential amendments required as a result of the relief sought.
Part 2 - District Wide Matters – General District-Wide Matters – EW – Earthworks – Standards – EW-S5	110	Support in part	Federated Farmers supports in part the EW-S5, however would like to see the 12 metres distances from transmission lines change to the safety standard of 8m, as we have previously submitted on in this submission. We reiterate this is over-regulatory.	Federated Farmers seeks the following relief: <ul style="list-style-type: none"> (a) the changing of wording in the SW-R5 to read as the following; <ul style="list-style-type: none"> <i>'Earthworks within 12 8 metres of the centre line of a 110kV or a 220kV National Grid transmission line or within 10 metres of the centre line of a 66kV transmission line must'</i>, or wording of similar intent; and (b) any consequential amendments required as a result of the relief sought.
Light				
Part 2 - District Wide Matters – General District-Wide Matters – EW – Light –	111	Support in part	Federated Farmers supports the policy with the addition of wording which gives primary production the ability to function when required to use lighting to aid in primary production purpose. These could include harvesting, dairy sheds to maintain a health and safety for both animals and workers.	Federated Farmers seeks the following relief: <ul style="list-style-type: none"> (a) the changing of wording in the LIGHT-P1 to read as the following; <ul style="list-style-type: none"> <i>Provide for lighting appropriate to its environment that:</i>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Policies – LIGHT-P1				<ol style="list-style-type: none"> 1. <i>provides for the safe and efficient use of the outdoors for a range of activities, including for night-time working, recreation and entertainment activities; and</i> 2. <i>maintains the character and qualities of the surrounding area; and</i> 3. <i>supports the social, cultural, and economic wellbeing and health and safety of people and communities, including road safety; and</i> 4. <i>minimises sky glow and light spill, and</i> 5. <i>protects the identified values and qualities of light sensitive areas; and</i> 6. <u><i>activities associated with primary production.</i></u> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Noise				
Part 2 - District Wide Matters – General District-Wide Matters – EW – Noise – Policies – NOISE-Noise-R1	112		<p>Federated Farmers supports the intent of rule Noise – R1. However, we seek clarification on the exceptions listed in performance standard PER-2. PER-2 states that the rule does not apply to cropping, top dressing, and spraying for the purpose of farming or conservation carried out in the Rural Production, Horticulture zones, or within Significant Natural Area on a seasonal, temporary, or intermittent basis for a period up to 30 days in any 12-month period.</p> <p>The exception is broad in its application in that it does not say what state what scale is applicable. Is the exception to be applied on a site-by-site basis so that it is intended to cover the land of a farm owned by one person. Alternatively, is it meant to apply on a larger scale so that if a person owned land in more than one title, the 30</p>	<p>Federated Farmers seeks the following relief:</p> <ol style="list-style-type: none"> (a) clarification from the Timaru District Council on the application of the third exception under PER-2 and how the Council intends to apply and enforce this exception; and (b) the amendment of the definition for farming to include aircraft and helicopter movements where these are being used for operations as a part of farming on rural airstrips and landing areas; and (c) any consequential amendments required as a result of the relief sought.

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
			<p>days apply to all of that land regardless of it being in different certificates of title.</p> <p>The district plan needs to provide for the continuance of existing, lawfully established activities such as farming. The rule as currently drafted is confusing, particularly when regard is had to the text under the heading 'Rules' and before the rules themselves. The text states that the noise rules and standards do not apply for agriculture, horticulture and pastoral farming activities undertaken for a limited duration, including using agricultural vehicles, machinery or equipment used on a seasonal or intermittent basis, forestry planting and forestry harvesting in the Rural Production, Horticulture and Horticulture Processing zones.</p>	
Part 3 – Areas Specific Matters – Zones				
General Rural Zone				
Part 3 – Areas Specific Matter – Zones – RURZ- Rural Zones – SETZ – Settlement Zone – Overview	113		<p>Federated Farmers supports the recognition in the overview of the fact it is important to differentiate the general rural zone from the rural lifestyle zone. We also support the strong recognition that has been given to rural land as an important resource.</p> <p>The proposed district plan has strayed into private property rights through dictating what can and cannot be done on rural production land.</p> <p>Returns from farming are variable due to a variety of factors including weather conditions, economic conditions, individual property circumstances and market demands. Like any business, diversification, flexibility, responsiveness, and cash flow are critically important to retaining their viability.</p> <p>Farmers undertake low impact subdivision for a variety of reasons. These vary from diversifying their business into</p>	<p>Federated Farmers seeks the following relief:</p> <ul style="list-style-type: none"> (a) the amendment of the overview, objectives, policies, rules, and standards in the rural production chapter to recognise and provided for private property rights and allow landowners to subdivide land in the rural production zone for specific purposes such as creating lifestyle lots and lots for family members (amongst other matters); and (b) any consequential amendments required as a result of the relief sought.

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
			<p>tourism operations (luxury lodges and or associated tourism development and infrastructure), providing for disposing of a surplus dwelling on the property where a neighbouring farm is purchased, providing for a family member or staff member to live on the farm or to implement a succession plan for multiple siblings through small lot subdivision. The proposed chapter has taken away any flexibility for farmers to subdivide their land for specific purposes without undermining the primary production or life-style value of the remaining land.</p> <p>The chapter as drafted, adds another layer complexity on top of the regulations and provisions that exist in regional council planning documents and in National Policy Statements. The Council seems intent of duplicating provisions which may have already been dealt with at regional and national levels.</p>	
Part 3 – Areas Specific Matter – Zones – RURZ- Rural Zones – SETZ – Settlement Zone – Objectives – GRUZ, 01,02,03,05,06	114	Support	<p>Federated Farmers supports the inclusion of these objectives in the proposed district plan.</p> <p>We see no need to make any further amendments on these.</p>	Federated Farmers seeks the retention of the proposed objectives for GRUZ, 01,02,03, or amended wording that has the same intent.
Part 3 – Areas Specific Matter – Zones – RURZ- Rural Zones – SETZ – Settlement Zone	115	Support in part	<p>Federated Farmers supports in part the objective for GRUZ-04, 'Protecting sensitive activities and sensitive zones', there needs to be recognition that bureaucracy cannot be placed on private landowners without proper remuneration for the land being retired or lost as a result from existing primary production use.</p>	<p>Federated Farmers seeks the following relief;</p> <p>(b) the addition of GRUZ-04 so it reads the following; <i>Intensive primary production, mining, quarrying and other intensive activities generates no or minimal adverse effects on:</i> 5. <i>sensitive activities; and</i></p>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
– Objectives – GRUZ 04			We seek to make minor amendments to this objective to better represent the rural zone.	<p>6. <i>land close to Residential, Rural settlement, Māori Purpose and Open space zones, <u>unless the existing activities still occur.</u></i></p> <p>(c) any consequential amendments required as a result of the relief sought.</p>
Part 3 – Areas Specific Matter – Zones – RURZ- Rural Zones – SETZ – Settlement Zone – Policies – GRUZ-P1	116	Support in party	Federated Farmers supports this policy in general. The policy should go further than simply <i>allowing</i> primary production and should <i>enable</i> it instead, as per the enabling intent of Section 5 of the RMA.	<p>Federated Farmers seeks relief of the following;</p> <p>(a) the addition of GRUZ-P1 so it reads the following; <i>Enable a range of primary production activities, where they:</i></p> <ol style="list-style-type: none"> 1. allow <i>enable for the ongoing productive use of land for present and future generations;</i> 2. <i>maintain the character and qualities of the General Rural Zone; and</i> 3. <i>meet the standards and requirements to minimise adverse effects on sensitive activities and the environment.</i> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 3 – Areas Specific Matter – Zones – RURZ- Rural Zones – SETZ – Settlement Zone – Policies – GRUZ-P2	117	Support	Federated Farmers supports the policy. It is key to ensuring that the character and qualities of the general rural zone are protected from urban creep and development which could occur within the urban zone.	Federated Farmers seeks the retention of the proposed policy for GRUZ-P2, or amended wording that has the same intent.
Part 3 – Areas Specific Matter – Zones – RURZ- Rural Zones – SETZ – Settlement Zone	118	Support	Federated Farmers seeks to retain the proposed policy. This policy is important in making sure that development is in line with what occurs within the zone and will not affect the primary operations within the zone.	Federated Farmers seeks the retention of the proposed policy for GRUZ-P3, or amended wording that has the same intent.

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
– Policies – GRUZ-P3				
Part 3 – Areas Specific Matter – Zones – RURZ- Rural Zones – SETZ – Settlement Zone – Policies – GRUZ-P4	119	Support	Federated Farmers supports to retain this policy. It is important for any sector of New Zealand to have proper access to emergency facilities. Many of these are supported by farmer volunteers.	Federated Farmers seeks the retention of the proposed policy for GRUZ-P4, or amended wording that has the same intent.
Part 3 – Areas Specific Matter – Zones – RURZ- Rural Zones – SETZ – Settlement Zone – Policies – GRUZ-P5	120	Support in part	Federated Farmers supports this policy in general. The policy should go further than simply <i>avoiding</i> primary production and should <i>enable</i> it instead, as per the enabling intent of Section 5 of the RMA.	Federated Farmers seeks the relief of the following; (a) the addition of GRUZ-P5 so it reads the following; <i>Manage sensitive activities in the zone to ensure:</i> 1. <i>they are located to avoid <u>enable management of</u> adverse effects on primary production;</i> 2. <i>if avoidance is not possible, the sensitive activity includes mitigation measures so that there is minimal potential for adverse effects on the sensitive activity from primary production.</i> (b) any consequential amendments required as a result of the relief sought.
Part 3 – Areas Specific Matter – Zones – RURZ- Rural Zones – SETZ – Settlement Zone – Policies – GRUZ-P6	121	Support in part	Federated Farmers supports this policy in general. The policy should go further, rather than putting landowners off using their land as a diversification of income for the district, we should enable such production, as per enabling intent of Section 5 of the RMA.	Federated Farmers seeks the relief of the following; (a) the addition of GUZ-P6 so it reads the following; (1) <i>Enable small scale quarry activities (up to 2,000m²), subject to requirements to protect the environment and sensitive activities.</i> (2) <i>Only allow mining and other quarry activities in the General rural zone where:</i> a. <i>adverse effects on sensitive environment and sensitive activities are avoided <u>managed</u>, or if</i>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
				<p>avoidance management is not possible minimised; and</p> <p>b. adverse effects on primary production and other activities are managed in accordance with appropriate management plans; and</p> <p>c. vehicle access is suitable and safe, and the traffic generation can be safely and efficiently accommodated by the surrounding road network; and</p> <p>d. adverse effects on protected rock art and archaeological sites and local character and qualities are avoided minimised; and</p> <p>e. adverse effects on local character and qualities are minimised; and</p> <p>f. sites are progressively rehabilitated to enable the establishment of a land use consistent with the surrounding area.</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 3 – Areas Specific Matter – Zones – RURZ- Rural Zones – SETZ – Settlement Zone – Policies – GRUZ-P7	122	Support	Federated Farmers supports the policy as it stands with a minor change to the addition of enable in the policy when talking about primary production, as per enabling intent.	<p>Federated Farmers seeks the relief of the following;</p> <p>(a) the addition of GRUZ-P7 so it reads the following;</p> <p>(1) only allow rural industries and other activities (not listed in the rules) in the General Rural Zone where:</p> <p>a. the activity</p> <p>i. was legally established use not permitted in the zone; or</p> <p>ii. supports <u>and enables</u> primary production <u>functions</u>; or</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 3 – Areas Specific Matter – Zones – RURZ-	123	Support in part	Federated Farmers supports the inclusion of this policy. However see the policy could go further to encourage farmers to diversify the income streams from their land, in	<p>Federated Farmers seeks the following relief;</p> <p>(a) the addition of GRUZ-P8 so it reads the following;</p>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Rural Zones – SETZ – Settlement Zone – Policies – GRUZ-P8			<p>order to better accommodate the changed environment they work in.</p> <p>Farmers need to be able to subdivide up land to create revenue streams and also for generational use on the land. It is important that the rules seek to reflect it.</p>	<p><i>Provide for residential activities in the General rural zone where:</i></p> <ol style="list-style-type: none"> 1. <i>fragmentation of rural land for non-primary production activities is avoided managed; and</i> 2. <i>the character and qualities of the general rural zone are maintained; and</i> 3. <i>the requirements of GRUZ-P5 are met; and</i> 4. <i>any minor residential unit is ancillary and subordinate to the site's principle residential unit.</i> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 3 – Areas Specific Matter – Zones – RURZ- Rural Zones – SETZ – Settlement Zone – Policies – GRUZ-P9	124	Support	Federated Farmers supports to retain this policy. It is important for landowners who require staffing for their land to have the ability to properly care for and enable people to move to prospective employment where housing may be an issue.	Federated Farmers seeks the retention of the proposed policy for GRUZ-P9, or amended wording that has the same intent.
Part 3 – Areas Specific Matter – Zones – RURZ- Rural Zones – SETZ – Settlement Zone – Policies – GRUZ-P9	125	Support	Federated Farmers supports to retain this policy.	Federated Farmers seeks the retention of the proposed policy for GRUZ-P9, or amended wording that has the same intent.
Part 3 – Areas Specific Matter	126	Support in part	While Federated Farmers supports the permitted activity classification for rural produce retail, we question the	Federated Farmers seeks the following relief:

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
<p>– Zones – RURZ-Rural Zones – SETZ – Settlement Zone – Rules – GRUZ-R1</p>			<p>requirement in performance standard PER-1 for this to be set back a minimum of 30m from any internal boundaries. Stands and stalls for farm produce need to be located where they are visible from the road. A 30m setback is onerous and unrealistic.</p>	<p>(a) the deletion of the 50m and 200m setback requirement from PER-1 and PER-4 of rule GRUZ-R1; or (b) if the Council is not inclined to accept the relief outlined in (a) above, we seek the reduction of the setback from 30m to 5m; and (c) any consequential amendments required as a result of the relief sought.</p>
<p>Part 3 – Areas Specific Matter – Zones – RURZ-Rural Zones – SETZ – Settlement Zone – Rules – GRUZ-R2</p>	<p>127</p>	<p>Oppose in part</p>	<p>Federated Farmers opposes the current rule in its draft form. It is over prescriptive and creates far reaching regulation which puts landowners off the diversification of their income streams.</p> <p>To restrict the sale of free-range pigs from farm to farm is ill-conceived, furthering the bureaucracy that is being placed on farmers.</p> <p>It is also important the rules fit in line with what industry has recommended, along with over regional councils. A 100m boundary from unworkable and not proposed under many district plans, which has a 50m boundary. We urge the council to be in line with what is already occurring in industry.</p> <p>Federated Farmers seeks the relief of unworkable rules and seek to propose the following amendments.</p>	<p>Federated Farmers seeks the relief of the following;</p> <p>(a) the addition of GRUZ-R2 so it reads the following;</p> <p><i>PER-1</i></p> <p>The pigs are for the subsistence of the people residing on the site; and are not sold to anyone not residing on the site; and</p> <p><i>PER - 2</i></p> <p><i>There are no more than six twenty five pigs located on the site and the pigs are setback a minimum distance of 25m from a building containing an existing sensitive activity on a separate site under different ownership; or</i></p> <p><i>PER- 3</i></p> <p><i>There is between 7 and 25 pigs on the site and the pigs are setback a minimum distance of:</i></p> <p><i>(a) 50m of a building containing and existing sensitive activity on a separate site under different ownership; and</i></p>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
				<p>(b) 100m <u>50m</u> of the boundary with a Residential, Rural Lifestyle, Rural Settlement, Māori Purpose or Open Space Zone</p> <p>(c) any consequential amendments required as a result of the relief sought.</p>
Part 3 – Areas Specific Matter – Zones – RURZ-Rural Zones – SETZ – Settlement Zone – Rules – GRUZ-R3	128	Support in part	<p>Federated Farmers supports this rule as it stands. However PER-4 is over prescriptive and creates regulation that is not in line with is being proposed with other district councils in their plans. 100m is over prescriptive, where most councils ask for 25-50m from boundary fences.</p> <p>This rule would severely restrict small farmland blocks which in sometimes have 200-300m each side of their boundary fences.</p>	<p>Federated Farmers seeks the following relief;</p> <p>(a) the addition of GRUZ-3 so it reads the following;</p> <p><i>PER-4</i></p> <p><i>No roosters are kept within 100m <u>25-50m</u> from the notional boundary of an existing sensitive activity on a separate site under different ownership; and</i></p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 3 – Areas Specific Matter – Zones – RURZ-Rural Zones – SETZ – Settlement Zone – Rules – GRUZ-R10	129	Support	<p>Federated Farmers strongly supports the inclusion of this rule into the district plan.</p> <p>We would like to see the inclusion of recognition of agricultural conservation activities through the use of aviation.</p> <p>Farmers hold intergenerational views and conservation is a way to ensure their land is protected, left in a better state for future generations to enjoy.</p>	<p>Federated Farmers seeks the following relief:</p> <p>(a) the addition of GRUZ-10 so it reads the following:</p> <p><i>PER-10</i></p> <p><i>Land, buildings and structures are used for:</i></p> <p><i>- Preservation, protection, restoration, promulgation or enhancement of indigenous species or habitats of indigenous fauna; or</i></p>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
				<p>- pest control; or</p> <p>- conservation education; or</p> <p>- observation or surveying; or</p> <p>- <u>agricultural aviation conservation</u></p> <p>- walking tracks, board walks, pedestrian bridge.</p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 3 – Areas Specific Matter – Zones – RURZ-Rural Zones – SETZ – Settlement Zone – Rules – GRUZ-R12	130	Support in part	<p>Federated Farmers supports the policy with some minor changes. It is important that rural producers are given conditions to enter a market of producer to consumer becomes more predominant. Feedback from people with these stalls see 10m as too prescriptive and would like to see minor changes to reflect that 10m is not obtainable on all highways and byways of the district.</p> <p>It is important that council enables the conditions of growth for these stalls and not stifle.</p>	<p>Federated Farmers seeks the following relief;</p> <p>(a) the addition of GRUZ-R12 so it reads the following;</p> <p><i>PER-1</i></p> <p><i>The retail area has a maximum gross floor area of 100m² and is set back a minimum of 10m 8m from a road boundary, <u>where deemed safe</u>; and,</i></p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 3 – Areas Specific Matter – Zones – RURZ-Rural Zones – SETZ – Settlement Zone – Rules – GRUZ-R14	131	Oppose in part	<p>Federated Farmers stands with submission by the New Zealand Agricultural Aviation Association and oppose PER1 and PER 2 removed and replaced with alternative wording.</p> <p>It is important the insert of a definition inserted which will support the permitted activity defined in the rule.</p> <p>We are in support of PER-3 as written and seek to make no further changes to it's wording.</p>	<p>Federated Farmers seeks the following relief;</p> <p>(a) the addition of GRUZ-14 so it reads the following;</p> <p><i><u>“Agricultural aviation activities of the purpose of primary production or conservation on a seasonal temporary or intermittent basis for a period up to 30 days in any 12 month period or 315 aircraft hours (whichever is greater).”</u></i></p>

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
				<p><u>Aircraft means, any machine that can derive support in the atmosphere from the reactions of the air otherwise than by the reactions of the air against the surface of the earth.</u></p> <p><u>Agricultural aviation activity means the intermittent operation of an aircraft from a rural airstrip or helicopter landing area for primary production, biosecurity, or biodiversity purposes including stock management, and the application of fertiliser, agrichemicals, or vertebrate toxic agents (VTA's). For clarity, aircraft includes fixed-wing aeroplanes, helicopters, and unmanned aerial vehicles (UAV's)</u></p> <p><u>A "Day" as it relates to agricultural aircraft activities means 10.5 hours aircraft hours conducted between the beginning of civil morning twilight (MCT) and the end of civil evening twilight (ECT).</u></p> <p><u>NOTE. A day is defined in the Civil Aviation rules as: the hours between—</u></p> <p><u>(1) the beginning of morning civil twilight, which is when the centre of the rising sun's disc is 6 degrees below the horizon; and</u></p> <p><u>(2) the end of evening civil twilight, which is when the centre of the setting sun's disc is 6 degrees below the horizon</u></p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Part 3 – Areas Specific Matter – Zones – RURZ-	132	Oppose in part	This standard is very specific and detailed, and perhaps overly prescriptive for a minor effect, and an activity that is already regulated under Property Law Act. The policy	Federated Farmers seeks relief on the following;

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Rural Zones – SETZ – Settlement Zone – Rules – GRUZ-R15			restricts that matter to shading of property and roads, so the rule must only be for this purpose. Farm shelterbelts will be restricted, meaning farmers will not be able to provide shade and shelter for livestock welfare.	(a) the addition of GRUZ-R15 so it reads the following; PER-1 The height of any trees located within 100m of a residential unit on an adjoining site are contained within an envelope defined by a recession plane of 1m vertical for every 3.5m horizontal that originates from the closest point of the residential unit; and - PER-2 Trees are not in such a position that they cause icing of a road as a result of shading the road between 10 am and 2 pm on the shortest day. (b) any consequential amendments required as a result of the relief sought.
Part 3 – Areas Specific Matter – Zones – RURZ-Rural Zones – SETZ – Settlement Zone – Rules – GRUZ-R16	133	Support	Federated Farmers supports to retain this rule.	Federated Farmers seeks the retention of the proposed rule for GRUZ-R16, or amended wording that has the same intent.
Part 3 – Areas Specific Matter – Zones – RURZ-Rural Zones – SETZ – Settlement Zone – Rules – GRUZ-R18	134	Support in part	Federated Farmers supports to retain this policy. However we urge council to be careful with permitting restricted discretionary activity such as shading on roads. This is covered in regulation already and does not need a double up.	Federated Farmers seeks the retention of the proposed policy for GRUZ-R18, or amended wording that has the same intent.

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Part 3 – Areas Specific Matter – Zones – RURZ- Rural Zones – SETZ – Settlement Zone – Rules – GRUZ-R21	135	Support	Federated Farmers supports farming activity being classified as a permitted activity in the rural production zone.	Federated Farmers seeks the following relief: (a) the retention of the permitted activity classification status for farming activities in rule GRUZ-R21; and (b) any consequential amendments required as a result of the relief sought.
Part 3 – Areas Specific Matter – Zones – RURZ- Rural Zones – SETZ – Settlement Zone – Rules – GRUZ-R23	136	Support in part	<p>Farm quarries need to be clearly differentiated from industrial extractive quarries. Although there is a separate definition for <i>farm quarries</i>, they need to be clearly excluded from this definition.</p> <p>Farm quarries are: small scale; the winnings are used on the property; the winnings not for sale but for personal use; used intermittently when needed; ancillary to existing farm land use; effects are contained within the property. This contrasts with industrial quarries that are: large scale; winnings are for sale; winnings are transported off the property using roads; used daily/weekly; permanent presence of equipment and employees; a commercial enterprise in own right; and effects can extend beyond the site/property. A definition that does not exclude farm quarries will behold them to the same level of regulation as a commercial quarry like Winstone Aggregates as if they have the same level of effects, which is inequitable and onerous.</p>	<p>Federated Farmers seeks the following relief;</p> <p>(a) the addition of GRUZ-R23 so it reads the following; <i>RDIS-1</i> <i>The entirety of the existing quarry operation has an existing land use consent from Timaru District Council, <u>on all land, excluding farm quarries</u>; and</i></p> <p>(b) any consequential amendments required as a result of the relief sought.</p>
Rural Lifestyle Zone				
Part 3 – Areas Specific Matter – Zones – RURZ- Rural Zones –	137		Federated Farmers generally supports this chapter of the proposed district plan.	Federated Farmers seeks the following relief: (a) the retention of the rural lifestyle chapter as currently written or with wording of similar intent; and

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
RLZ Rural Lifestyle Zone -				(b) any consequential amendments required as a result of the relief sought.
Part 3 – Areas Specific Matter – Zones – RURZ- Rural Zones – RLZ Rural Lifestyle Zone- R16	138	Support in part	Federated Farmers supports to retain this policy. However, we urge council to be careful with permitting restricted discretionary activity such as shading on roads. This is covered in regulation already and does not need a double up.	Federated Farmers seeks the retention of the proposed policy for GRUZ-R18, or amended wording that has the same intent.
Settlement Zone				
Part 3 – Areas Specific Matter – Zones – RURZ- Rural Zones – SETZ Settlement Zone - Overview	139	Support	Federated Farmers generally supports this chapter of the proposed district plan.	Federated Farmers seeks the following relief: (a) the retention of the Settlement Zone chapter as currently written or with wording of similar intent; and (b) any consequential amendments required as a result of the relief sought.
Natural Open Space Zone				
Part 3 – Area Specific Matters – Zones – OSRZ – Open Space and Recreation Zones – NOSZ – Natural Open Space Zone – Overview	140	Support	Federated Farmers generally supports this chapter of the proposed district plan.	Federated Farmers seeks the following relief: (a) the retention of the Natural Open Space Zone chapter as currently written or with wording of similar intent; and (b) any consequential amendments required as a result of the relief sought.
Open Space Zone				
Part 3 – Area Specific Matters – Zones – OSRZ –	141	Support	Federated Farmers generally supports this chapter of the proposed district plan.	Federated Farmers seeks the following relief: (a) the retention of the Open Space Zone chapter as currently written or with wording of similar intent; and

Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Open Space and Recreation Zones – OSZ-Open Space Zone – Overview				(b) any consequential amendments required as a result of the relief sought.

From: [Jessica Kerr](#)
To: [Jane Marine](#)
Subject: SAVED CM: FW: Timaru District Plan - Federated Farmers of New Zealand Submission
Date: Thursday, 13 April 2023 2:45:16 pm
Attachments: [image007.png](#)
[image008.png](#)
[image080642.png](#)

Hi Jane,

I don't have the computer system to be able to do so, but could you please convert this email to a PDF and then merge it to the final PDF that was submitted for the submission?

Hopefully that makes sense!

Cheers,
 Jess ☺

TIMARU **Jessica Kerr**
 Timaru District Council | PO Box 522 | Timaru 7940
 DISTRICT COUNCIL P:7461 | W: www.timaru.govt.nz
 Te Kaunihera ā-Rohē
 o Te Tihī o Maru

From: James Sutherland <jsutherland@fedfarm.org.nz>
Sent: Wednesday, April 12, 2023 12:09 PM
To: Jessica Kerr <Jessica.Kerr@timdc.govt.nz>
Subject: RE: Timaru District Plan - Federated Farmers of New Zealand Submission

Kia Ora Jessica,

Apologies for the misunderstanding there.

1. Submission point 35 we would like to amend to the following. It should read as HS-03, the NH03 was a typo error. NH should not be included in this submission point and would like to see the following amendment to follow what has been proposed in the plan.

- District atters – and Risks azardous s – s	35	Support	Federated Farmers supports objectives HS-01 to HS-03 as currently drafted. In particular, we support objective NH-03 HS-03 which recognises that there may be a functional need for new infrastructure to be located within identified hazard areas.	Federated Farmers seeks the following relief: (a) the retention of objectives NH-01 to NH-04 HS-01 to HS-03 as currently drafted or wording with similar effect; and (b) any consequential amendments required as a result of the relief sought.
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2. Submission point 126 we would like to amend to the following so it is succinct with what is being proposed in the draft plan.

- Areas matter – - RURZ- es – SETZ- ent Zone - GRUZ-	126	Support in part	While Federated Farmers supports the permitted activity classification for <u>the general rural zone rural produce retail</u> , we question the requirement in performance standard PER- 3 and PER-4 for this to be set back a minimum of 30m from any internal boundaries. Stands and stalls for farm produce need to be located where they are visible from the road. A 30m 50m and 200m setback is onerous and unrealistic.	Federated Farmers seeks the following relief: (a) the deletion of the 50m and 200m setback requirement from PER- 3 and PER-4 of rule GRUZ-R1; or (b) if the Council is not inclined to accept the relief outlined in (a) above, we seek the reduction of the setback from 3050m and 200m to <u>305m</u> ; and (c) any consequential amendments required as a result of the relief sought.
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3. Federated Farmers seeks to amend the wording in points 109,113, and 135 of 'Rural Production Zone' to be read as 'Rural Zone' exclusively.

If there are any further issue please be in contact via my cell number 027-387-8909.

Really appreciate the ability to make these amendments in relation to the submission to allow for better relation to the proposed district plan.

Nga mihi nui,

James

From: Jessica Kerr <Jessica.Kerr@timdc.govt.nz>
Sent: Tuesday, April 11, 2023 2:25 PM
To: James Sutherland <jsutherland@fedfarm.org.nz>
Subject: RE: Timaru District Plan - Federated Farmers of New Zealand Submission

Hi James,

Thank you for that. This email will suffice as clarification of the points you want removed. I will save confirmation to file and undertake the changes.

Although I would confirm with you (in an email is fine) regarding:

1. Submission Point No. 35 refers to the Hazardous Substances (HS) part of the plan under the provision and the submission point, however then refers to the Natural Hazards (NH) part of the plan in the relief sought. I note that NH doesn't have an O4, nor HS an O3. Could you please confirm

which part of the plan you are referring to, or whether you would like to amend your submission point or relief sought? See below for reference:

Part 2 – District Wide Matters – Hazards and Risks – HS – Hazardous	35	Support	Federated Farmers supports objectives HS-O1 to HS-O3 as currently drafted. In particular, we support objective NH-O3 which recognises that there may be a functional need for new infrastructure to be located within identified hazard areas.	Federated Farmers seeks the following relief: (a) the retention of objectives NH-O1 to NH-O4 as currently drafted or wording with similar effect; and (b) any consequential amendments required as a result of the relief sought.
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Federated Farmers of New Zealand Submission to Timaru District Council's Proposed District Plan – December 2022

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Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
Substances – Objectives				

2. Submission Point No. 126 refers to GRUZ-R1 (General Rural Zone part of the plan). In the proposed district plan GRUZ-R1 does not refer to a 30m setback anywhere as per your submission point. The relief sought for this point does refer to the 50m and 200m setback as per GRUZ-R1 however it is not clear if this is what you are referring to and if it is to match your submission point because we have no inclusion of anything regarding a 30m setback in the rule. The rule also does not address Rural Produce Retail. GRUZ-R12 which is the actual Rural Produce Retail rule also doesn't address the 30m setback. Could you please confirm which rule you are referencing and if you would like to amend either your relief sought or submission point? See below for reference:

Part 3 – Areas Specific Matter	126	Support in part	While Federated Farmers supports the permitted activity classification for rural produce retail, we question the	Federated Farmers seeks the following relief:
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Federated Farmers of New Zealand Submission to Timaru District Council's Proposed District Plan – December 2022

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Proposed District Plan provision	Submission Point	Support/ Oppose	Federated Farmers Submission	Relief Sought
– Zones – RURZ-Rural Zones – SETZ – Settlement Zone – Rules – GRUZ-R1			requirement in performance standard PER-1 for this to be set back a minimum of 30m from any internal boundaries. Stalls and stalls for farm produce need to be located where they are visible from the road. A 30m setback is onerous and unrealistic.	(a) the deletion of the 50m and 200m setback requirement from PER-1 and PER-4 of rule GRUZ-R1; or (b) if the Council is not inclined to accept the relief outlined in (a) above, we seek the reduction of the setback from 30m to 5m; and (c) any consequential amendments required as a result of the relief sought.

Could you please respond to this before at least the end of tomorrow (12th April 2023) as we are currently in the process of finalising all submissions.

Let me know if there is any way I can help.

Regards,



Jessica Kerr

Timaru District Council | PO Box 522 | Timaru 7940
P:7461 | W: www.timaru.govt.nz

From: James Sutherland <jsutherland@fedfarm.org.nz>
Sent: Tuesday, April 11, 2023 1:51 PM
To: Jessica Kerr <Jessica.Kerr@timdc.govt.nz>
Subject: Timaru District Plan - Federated Farmers of New Zealand Submission

Kia Ora Jessica and Team,

Following your February 16 email which stated two submission points which don't have relevance to the proposed District Plan.

Submission points 109,113, and 135 should not have been submitted under the Proposed Timaru District Plan. Please take this email as notice for those submission points as void for our submission.

I am happy to provide another copy of our submission with those strike-out.

Nga mihi nui,



James Sutherland
GRADUATE REGIONAL POLICY ADVISOR
Federated Farmers of New Zealand

M 027 387 8909
E jsutherland@fedfarm.org.nz
W: www.fedfarm.org.nz
A: 60 Tennyson Street, Dunedin Central, Dunedin, 9016



Kia Ora Jessica,

Apologies for the misunderstanding there.

1. Submission point 35 we would like to amend to the following. It should read as HS-03, the NH03 was a typo error. NH should not be included in this submission point and would like to see the following amendment to follow what has been proposed in the plan.

Part 2 – District Wide Matters – Hazards and Risks – HS – Hazardous Substances – Objectives	35	Support	Federated Farmers supports objectives HS-O1 to HS-O3 as currently drafted. In particular, we support objective NH-03 <u>HS-03</u> which recognises that there may be a functional need for new infrastructure to be located within identified hazard areas.	Federated Farmers seeks the following relief: (a) the retention of objectives NH-O1 to NH-O4 <u>HS-01 to HS-03</u> as currently drafted or wording with similar effect; and (b) any consequential amendments required as a result of the relief sought.
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2. Submission point 126 we would like to amend to the following so it is succinct with what is being proposed in the draft plan.

Part 3 – Areas Specific Matter – Zones – RURZ- Rural Zones – SETZ – Settlement Zone – Rules – GRUZ-R1	126	Support in part	While Federated Farmers supports the permitted activity classification for <u>the general rural zone rural produce retail</u> , we question the requirement in performance standard PER-1 3 <u>PER-4</u> for this to be set back a minimum of 30m from any internal boundaries. Stands and stalls for farm produce need to be located where they are visible from the road. A 30m <u>50m and 200m</u> setback is onerous and unrealistic.	Federated Farmers seeks the following relief: (a) the deletion of the 50m and 200m setback requirement from PER-1 3 <u>PER-4</u> of rule GRUZ-R1; or (b) if the Council is not inclined to accept the relief outlined in (a) above, we seek the reduction of the setback from 3050m and 200m <u>to 305m</u> ; and (c) any consequential amendments required as a result of the relief sought.
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3. Federated Farmers seeks to amend the wording in points 109,113, and 135 of 'Rural Production Zone' to be read as 'Rural Zone' exclusively.

If there are any further issue please be in contact via my cell number 027-387-8909.

Really appreciate the ability to make these amendments in relation to the submission to allow for better relation to the proposed district plan.

Nga mihi nui,

James

Michelle Reeves

From: James Sutherland <jsutherland@fedfarm.org.nz>
Sent: Monday, 19 December 2022 8:08 am
To: PDP
Subject: RE: Federated Farmers Submission on Proposed District Plan
Attachments: SC258R0426322121907120.pdf

Kia Ora,

Apologies for the delay I was away on leave on Friday for a family bereavement so have only just come back into the office. I hope the form is okay and please let me know if there are anymore issues.

Have a great week and Merry Christmas!

Regards

James

From: PDP <pdp@timdc.govt.nz>
Sent: Friday, 16 December 2022 2:20 pm
To: James Sutherland <jsutherland@fedfarm.org.nz>
Subject: RE: Federated Farmers Submission on Proposed District Plan

You don't often get email from pdp@timdc.govt.nz. [Learn why this is important](#)

Dear James,

Thank you for your email. In order for your submission to be considered please can you complete the attached Submission Form and return as soon as possible.

Kind regards



Timaru District Council | PO Box 522 | Timaru 7940
P: 03 687 7200 | W: www.timaru.govt.nz

From: James Sutherland [<mailto:jsutherland@fedfarm.org.nz>]
Sent: Thursday, 15 December 2022 12:39 pm
To: PDP <pdp@timdc.govt.nz>
Cc: Greg Anderson <gregsandyanderson@gmail.com>; Eleanor Linscott <elinscott@fedfarm.org.nz>
Subject: Federated Farmers Submission on Proposed District Plan

Kia Ora,

Federated Farmers thanks you for the opportunity for being able to submit on the proposed district plan. We would also like to thank those that drafted the plan and its undertaking. Federated Farmers looks forwards to be in contact regarding our submission. Feel free to contact us at any time.

Nga mihi nui,



James Sutherland
GRADUATE REGIONAL POLICY ADVISOR
Federated Farmers of New Zealand

M 027 387 8909

E jsutherland@fedfarm.org.nz

W: www.fedfam.org.nz

A: 60 Tennyson Street, Dunedin Central, Dunedin, 9016

