



Federated Farmers of New Zealand

Submission on the Queenstown Lakes District Council Proposed District Plan

23/10/2015



SUBMISSION TO QUEENSTOWN LAKES DISTRICT COUNCIL ON THE PROPOSED DISTRICT PLAN

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This is a submission on the Queenstown Lakes District Council Proposed District Plan.

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

The specific provisions of the proposal that my submission relates to and the decisions we seek from Council are as detailed on the following pages.

We wish to be heard in support of our submission.

Section 1: General Submissions

1.1 Introduction

- 1.2 Federated Farmers welcomes the opportunity to comment on Queenstown Lakes District Council's Proposed District Plan.
- 1.3 Federated Farmers of New Zealand is a primary sector organisation that represents farmers, farming, rural businesses and rural communities. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand farmers.
- 1.4 The Federation aims to add value to its members' farming business. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:
- Our members may operate their business in a fair and flexible commercial environment;
 - Our members' families and their staff have access to services essential to the needs of the rural community; and
 - Our members adopt responsible management and environmental practices

2.1 Implications of King Salmon

- 2.2 Council will be aware of the Supreme Court's 2014 New Zealand King Salmon decision.¹ A key message ensuing from this decision was the importance of the 'choice of words' in higher level planning statements (in that particular case, the New Zealand Coastal Policy Statement (NZCPS)). In King Salmon, the use of the word "avoid" was found to mean "not allow" or "prevent the occurrence of".
- 2.3 There are a number of areas within the proposed district plan where the words 'avoid', 'prevent' or 'require' occur. Given the potential implications of using these terms in light of the King Salmon decision, we ask Council to review their use given the very direct implications of this wording and the subsequent implications for land owners, resource users and productivity in Queenstown Lakes District.

Decision sought:

Council review the use of the words 'avoid', 'prevent' or 'require' within the RPS in light of King Salmon and the implications for the region's resource use.

3.1 General Submissions applying to whole of plan change

- 3.2 Primary production activities are significant contributors to the economic, social and cultural well-being of the Queenstown Lakes district. These activities also have a positive

¹ *Environmental Defence Society Incorporated v The New Zealand King Salmon Company Ltd* [2014] NZSC 38.

impact on the economic sustainability and continued viability of many of the district's rural areas and townships.

- 3.3 Queenstown Lakes is a unique district in terms of economic wellbeing particularly. While primary production activities *directly* provide for only a small proportion of the Queenstown Lakes District's economic output, employment and business units, *indirectly* farming is a key contributor to the management of the landscapes and culture to those attracted to the District, particularly in respect to tourism.
- 3.4 Our members strongly support a planning approach that recognises this principle role landowners fulfil as managers, stewards and funders (both financially and in terms of time and effort committed) of the regions natural and physical resources. They also support plans that are truly effects based and do not unnecessarily inhibit or pose constraints on farming activity, or impose unnecessary costs.
- 3.5 Landowners are proactive resource managers who rely on their properties natural and physical resources for their farming business. It is entirely in their best interest to manage their land sustainably, and it is in the best interests of those who rely on those landscapes to take a partnership approach with farmers to achieve these mutual objectives.
- 3.6 Federated Farmers approaches the proposed Queenstown Lakes District Plan with a view to addressing four broad areas of concern expressed by farmers in the District:
- It is increasingly critical to landowners that regulation is both reasonable and provides appropriate certainty. We are seeking that Council clearly defines an issue, considers the extent of the impact that issue is having on the District's wellbeing, and then proposes a regulatory response to that issue that is cognisant of the costs being imposed on landowners. Most particularly this includes the costs of addressing uncertainty as a result of proposed provisions that are loose, too broad or subject to varying interpretations.
 - Farmers face an increasing number of compliance "hoops" to jump through in order to continue to farm. Where there is an already existing mechanism for achieving the same goal, farmers strenuously object to another set of regulations.
 - Farmers are the most efficient agents for achieving on-farm good practice and to that end we actively encourage non-regulatory methods to achieve and encourage good practices. There are substantial existing drivers for farmers to ensure that their on-farm practices meet environmental standards.
 - Increased regulation by councils translates into higher consent costs or rates for our members as well as other ratepayers. Farmers and communities are already heavily burdened by these costs and more council activity generally translates into higher council expenditure, higher consenting costs and higher rates.
- 3.7 Federated Farmers believes that when undertaking a district plan review it is essential that Council take into account and balances the economic, social, cultural and environmental considerations of any particular policy or provision. We consider that the emphasis often sways disproportionately towards environmental considerations and does not sufficiently account for the likely costs to plan users. While clear and necessary regulation is critical, it

is also important that Council considers the implications for those working under that regulation.

- 3.8 We are seeking to ensure that Council recognise and consider the way these economic, social, cultural and environmental factors interact. Economically viable primary production in the District enables farmers to better contribute to positive environmental, social and cultural outcomes. On the other hand, a reduction in the economic viability of primary production not only reduces the economic wellbeing of the District, but in doing so reduces the potential to achieve positive environmental, social and cultural wellbeing. This should be a particular concern where additional costs or regulation have the potential to adversely impact management of the rural landscapes that form a large component of the District's attraction to residents and visitors alike.
- 3.9 Federated Farmers fully supports the overall intention to appropriately recognise and enable primary production activities where appropriate, and to move to a more permissible approach for reasonable and compatible activities in the rural area.

Decision sought

Adopt the plan with specific changes sought in our submission

4.1 Specific submissions points

- 4.2 Specific submission points are addressed in the next section of this submission.

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
CHAPTER 1: INTRODUCTION			
1.2.4 Existing Use Rights	Oppose in part	<p>1.2.4 states that <i>Existing use rights do not apply if:</i></p> <ul style="list-style-type: none"> • <i>The use of land has been discontinued for a continuous period of more than 12 months, unless the Council has granted an extension by way of application; or</i> • <i>Reconstruction, alteration or extension of any building that contravenes a rule in the District Plan increases its degree of non-compliance.</i> <p>Section 10 (2) of the Resource Management Act notes that this is relevant only when a use of land that contravenes a rule in a district plan or a proposed district plan has been discontinued for a continuous period of more than 12 months after the rule in the plan became operative or the proposed plan was notified.</p> <p>This is stated at 1.2.3, but for clarities sake it would be useful to also outline at 1.2.4 that the 12 months refers to an activity which contravenes a rule in the District Plan.</p>	<p>1.2.4 is re-written as (or words to similar effect): <i>Existing use rights do not apply if:</i></p> <ul style="list-style-type: none"> • <i>The use of land has been discontinued for a continuous period of more than 12 months <u>after the rule in the district plan took legal effect</u>, unless the Council has granted an extension by way of application; or</i> • <i>Reconstruction, alteration or extension of any building that contravenes a rule in the District Plan increases its degree of non-compliance.</i>

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
CHAPTER 2: DEFINITIONS			
Building	Oppose in part	<p>The proposal is that 'building' shall have the same meaning as the Building Act 2004, with a number of exemptions in addition to those set out in the Building Act 2004.</p> <p>Section 8 of the Building Act defines 'building' as, unless the context otherwise requires;</p> <p style="padding-left: 40px;"><i>(a) "...a temporary or permanent movable or immovable structure (including a structure intended for occupation by people, animals, machinery, or chattels)".</i></p> <p>As written, this definition appears to include irrigation infrastructure. Council's proposed definition has a number of additional exemptions to those found in the Building Act 2004, and irrigation infrastructure is not included within these exemptions.</p> <p>Inclusion, intentional or otherwise, of irrigation infrastructure in the definition of building has the potential to impose significant and unnecessary costs on rural land users.</p> <p>Specifically excluding irrigation infrastructure is consistent with both the intent of the Environment Court's decision in <u>Haldon Station v Mackenzie District Council</u> (2014 NZEnvC 136) and with Council's Practice Note 1/2014 on <i>Centre Pivot & Linear Irrigators under the QLDC District Plan</i>, within which Council concluded that the principles of Haldon should apply equally in Queenstown Lakes District in that an irrigator should be considered a vehicle, not a building, as it 'has wheels and carries something'. As part of the practice note, Council concluded:</p> <p style="padding-left: 40px;">"The Haldon decision will reduce the regulatory requirements for a common piece of agricultural equipment that can be expected within the rural environment. As structures within the Rural General zone, irrigators are consistent with the principles of the zone which is designed to enable productive use of the land resource and which is characterised by farming activities.</p>	The definition is amended to specifically exclude irrigation and associated infrastructure from the definition of 'building'.

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Clearance Vegetation (Includes Indigenous Vegetation)	Of Oppose	<p>Council's s32 report outlines the adverse impacts that irrigation may have on some indigenous vegetation. Consequently, the proposed definition includes application of water (emphasis ours):</p> <p><i>“Means the removal, trimming, felling, or modification of any vegetation and includes cutting, crushing, cultivation, spraying with herbicide or burning.</i></p> <p><u><i>Clearance of vegetation includes, the deliberate application of water where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion. Includes dryland cushion field species.”</i></u></p> <p>Federated Farmers agrees that irrigation may change the ecological balance by favouring those species not well adapted to dryland situations and by enabling more frequent/intensive grazing.</p> <p>This is not the same as vegetation clearance. Irrigation is an expected and reasonable practice in the rural area, particularly in the rural areas of the District. Irrigation effectively ensures a consistency in water application when rainfall is unpredictable or inconsistent.</p> <p>Federated Farmers considers a fundamental question posed is the extent to which the farmed landscape can be considered a nature reserve? While preserving nature is important, human beings are still part of the ecology of the earth and have to grow food and generate income to sustain communities.</p> <p>Irrigation can also be used as insurance against occasional dry periods, and in these cases there may be relatively little impact on the ecological balance. It is a form of ensuring resilience at both farm level and for the regional and national economies.</p> <p>The definition suffers from a lack of regard to the questions of scale or significance, and Federated Farmers would prefer to see the issue addressed through the management of indigenous vegetation rather than being captured through this definition. If the issue relates to intensification of</p>	<p>The definition is rewritten to exclude the application of water, as below:</p> <p><i>“Means the removal, trimming, felling, or modification of any vegetation and includes cutting, crushing, cultivation, spraying with herbicide or burning.</i></p> <p><i>Clearance of vegetation includes, the deliberate application of water where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion. Includes dryland cushion field species.”</i></p>

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		<p>land use, then we consider it would be more effective and efficient to have a direct discussion around specific concerns rather than through the 'catch all' provision of the proposed definition.</p> <p>Nor should the significant economic and social benefits of irrigation and the potential costs as a result of this definition be divorced from considering the impacts of the proposed definition.</p> <p>Council will be aware of the case on this point in 2011 Royal Forest and Bird Protection Society of New Zealand Incorporated v Waitaki District Council: [2012] NZHC 2096. In this case that Court concluded that irrigation didn't fall within vegetation clearance.</p>	
Factory Farming	Support	<p>The proposed definition includes the following</p> <p><i>The use of land and/or buildings for the production of commercial livestock where the regular feed source for such livestock is substantially provided other than from grazing the site concerned.</i></p> <p>Federated Farmers believes this accurately distinguishes between factory farming and general farming activities or practices.</p>	The definition is adopted as proposed.
Farming Activity	Support	<p>The proposed definition is as follows:</p> <p><i>Means the use of land and buildings for the primary purpose of the production of vegetative matters and/or commercial livestock.</i></p> <p><i>Excludes residential activity, home occupations, factory farming and forestry activity. Means the use of lakes and rivers for access for farming activities.</i></p> <p>Federated Farmers considers this definition accurately captures farming activities.</p>	The definition is adopted as proposed.
Farm Building	Support in part	<p>The proposed definition is as follows:</p> <p><i>Means a building (as defined) necessary for the exercise of farming activities (as defined) and:</i></p> <p><i>(a) Excludes buildings for the purposes of residential activities, home occupations, factory farming and forestry activities.</i></p>	<p>The definition is amended as follows (or words to similar effect):</p> <p><i>Means a building (as defined) necessary for the exercise used for the purpose of farming activities (as defined) and:</i></p> <p><i>(a) Excludes buildings for the purposes of</i></p>

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		<p><i>(b) Excludes visitor accommodation and temporary accommodation.</i></p> <p>Federated Farmers largely supports the proposed definition. However, the word 'necessary' as it precedes 'for the exercise of farming activities' may place a significant burden of proof on the farmer. Many farm buildings (tool sheds, pump houses etc) are required to make farming more efficient, yet may not be considered necessary in the strictest application of the word.</p>	<p><i>residential activities, home occupations, factory farming and forestry activities.</i></p> <p><i>(b) Excludes visitor accommodation and temporary accommodation.</i></p>
Flood Protection Work	Support	Federated Farmers agrees the definition appropriately captures matters relating to flood protection work.	The definition is adopted as proposed.
Forestry Activity	Support in part	Federated Farmers agrees the definition is largely appropriate. However the proposed area of 0.5 ha may unnecessarily capture many small scale lots.	<p>The definition is amended as follows (or words to similar effect):</p> <p><i>Means the use of land primarily for the purpose of planting, tending, managing and harvesting of trees for timber or wood production in excess of 0.5ha <u>1 hectare</u> in area.</i></p>
Formed Road	Support in part	<p>The definition as currently written accurately defines a road, however it is necessary to distinguish between publicly and privately owned roads in the District.</p> <p><i>Means a road with a carriageway constructed to an all-weather standard with a minimum width of 3m.</i></p>	The definition is amended to distinguish between publicly and privately owned roads.
Holding	Support	Federated Farmers agrees the definition is appropriate.	The definition is adopted as proposed.

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Indigenous Vegetation	Oppose in part	The proposed definition is as follows: <i>Means vegetation that occurs naturally in New Zealand, or arrived in New Zealand without human assistance.</i>	The definition is amended as follows (or words to similar effect): <i>Means <u>plant communities dominated by species vegetation</u> that occurs naturally in New Zealand, or arrived in New Zealand without human assistance. <u>This may include a minor element of exotic vegetation but does not include regrowth in pasture.</u></i>
Informal Airport	Support	Federated Farmers agrees the definition is appropriate.	The definition is adopted as proposed.
Minor Upgrading	Support	Federated Farmers agrees the proposed definition appropriately captures minor upgrading, and we support that this is defined as to distinguish this from more significant upgrading.	The definition is adopted as proposed.
National Corridor	Grid Support	Federated Farmers supports the proposed definition of the National Grid corridor, particularly that this is reliant on the capacity of the line in question. We support the specific reference to the National Grid.	The definition is adopted as proposed.
National Sensitive Activities	Grid Support	Federated Farmers supports the identification and specific protection afforded to activities considered to be sensitive to the operation of the National Grid. We agree there should be tighter controls on these activities as they are likely more sensitive to the operation of the National Grid. Under the definitions within the National Policy Statement for Electricity Transmission it was made clear that rural activities or buildings are not sensitive activities. We support the exclusion of rural activities from the	The definition is adopted as proposed.

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
		proposed plan's definition.	
National Grid Yard		Federated Farmers supports the proposed distinction between the National Grid Corridor and the National Grid Yard to allow for a more tailored regulatory approach to the risks posed to other activities by the National Grid, and the risks posed to the operation and maintenance of the National Grid from other activities. We support the proposed 12m distance either side of the National Grid asset.	The definition is adopted as proposed.
Nature Conservation Values	Support	Federated Farmers agrees the definition is appropriate.	The definition is adopted as proposed.
Registered Homestay	Support	<p>As proposed, a Homestay is defined as being used by up to 5 paying guests, and will require registration with the Council as a Registered Homestay.</p> <p>Federated Farmers agrees that there is a need to distinguish between homestay activities, which are often undertaken as an activity ancillary to but not generally in conflict with rural production activity, and larger scale visitor accommodation, particularly in the rural area.</p>	The definition is adopted as proposed.

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Rural Place	Selling Support	Federated Farmers agrees the definition is appropriate.	The definition is adopted as proposed.
Sensitive Activities-Transmission Corridor	Support	Federated Farmers agrees it is necessary to define activities that are particularly sensitive to the risks associated with electricity. It is important that these sensitive activities are defined and protected appropriately to allow for less restrictions around non-sensitive activities in respect to the requirements to give effect to the NPSET.	The definition is adopted as proposed.
Utility	Support	Federated Farmers supports the explicit exclusion of water tanks.	The definition is adopted as proposed.
Visitor Accommodation	Support	Federated Farmers supports the explicit exclusion of Homestay accommodation and registered holiday homes from this definition.	The definition is adopted as proposed.
Waste Management Facility	Support	Federated Farmers supports the following exclusions: <i>(a) sites situated on production land in which the disposal of waste generated from that land takes place, not including any dead animal material or wastes generated from any industrial trade or process on that productive and;</i> <i>(b) sites used for the disposal of vegetative material. The material may include soil that is attached to plant roots and shall be free of hazardous substances and wastes.</i> <i>(c) site for the disposal of clean fill.</i>	The definition is adopted as proposed.

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
CHAPTER 3: STRATEGIC DIRECTION			
3.1 Purpose	Support in part	<p>Federated Farmers generally supports the overall purpose behind the proposed district plan.</p> <p>We note and support the intent for the proposed plan to provide for clean air and pristine water; however in terms of implementation of this purpose we underline the importance of distinguishing between Council's roles (infrastructure owner and provider, land use, advocate) and that of the regional council (regulator), particularly given Otago Regional Council has an operative water plan in place which sets out the water quality responsibilities of rural resource users in the region.</p>	Adopt the purpose as proposed; while ensuring the implementation around the aim to achieve clean air and pristine water appropriately recognises the roles of Queenstown Lakes District Council when considered against those of Otago Regional Council.
3.2.1 Goal - Develop a prosperous, resilient and equitable economy.	Support	Federated Farmers supports the Goal as proposed. It is important that Council recognises the vital role the District Plan has in providing for economic wellbeing.	The goal is adopted as proposed.
Objective 3.2.1.4 Recognise the potential for rural areas to diversify their land use beyond the strong productive value of farming, provided a sensitive approach is taken to rural amenity, landscape character, healthy	Support in part	<p>The Objective seeks to recognise <i>...the potential for rural areas to diversify their land use beyond the strong productive value of farming, provided a sensitive approach is taken to rural amenity, landscape character, healthy ecosystems, and Ngai Tahu values, rights and interests.</i></p> <p>Federated Farmers supports the proposed objective. Primary production in the District is in many respects economically reliant on the ability to diversify and find alternative and compatible revenue. This is particularly the case given the difficult terrain, varying weather and necessarily large expanse of landholdings (and associated costs) can often mean that primary production activity is economically marginal.</p> <p>Despite these economic concerns, farmers also take pride in the role they play in providing for the sweeping landscapes and rural culture they</p>	<p>Objective 3.2.1.4 is worded as follows (or words to similar effect):</p> <p>Recognise the potential for <u>importance of</u> rural areas to diversifying their land use beyond the strong productive value of farming, provided a sensitive approach is taken to rural amenity, landscape character, healthy ecosystems, and Ngai Tahu values, rights and interests <u>are appropriately considered.</u></p>

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
ecosystems, and Ngai Tahu values, rights and interests.		<p>contribute to the District, and largely consider it is their role to protect these values.</p> <p>However the use of the word 'sensitive' unnecessarily elevates these concerns, particularly for an objective. There are areas where farmers agree they do need to adopt a sensitive approach; however we would expect this is addressed within specific policies, not within an objective.</p>	
3.2.2 Goal - The strategic and integrated management of urban growth	Support	<p>Federated Farmers supports the proposed Goal and subsequent objectives. It is important that urban development in the district is well planned for and implemented. Not only does urban sprawl or poorly defined urban development place additional costs on council and ratepayers, it impacts the values within the rural area, and can result in reverse sensitivity issues and adversely impact primary production.</p>	The goal and subsequent objectives are adopted as proposed.
Objective 3.2.4.1 Promote development and activities that sustain or enhance the life-supporting capacity of air, water, soil and ecosystems.	Support	<p>Council has a role to play in promoting these activities.</p>	The objective is adopted as proposed.
Objective 3.2.4.2 Protect areas with significant Nature Conservation Values.	Support in part	<p>Federated Farmers supports Council defining areas with significant Nature Conservation Values and setting appropriate rules, policies and objectives around these. However, the use of the word 'protect' sets a very high bar for an objective. We consider appropriate management of these areas is a better objective.</p>	<p>Objective 3.2.4.2 is reworded as follows (or words to similar effect):</p> <p>Protect a <u>Areas with significant Nature Conservation Values are protected or appropriately managed.</u></p>
Policy 3.2.4.2.1	Support in part	<p>Federated Farmers supports Council defining areas significant indigenous</p>	Policy 3.2.4.2.1 is reworded as follows (or

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
Identify areas of significant indigenous vegetation and significant habitats of indigenous fauna, referred to as Significant Natural Areas on the District Plan maps and ensure their protection.		<p>vegetation and significant habitats of indigenous fauna.</p> <p>Farmers and other resource users benefit where these areas are appropriately defined and reasonable rules, policies and objectives are developed around these.</p> <p>However, the use of the word 'protect' in this policy is of concern given the subsequent policy 3.2.4.2.2 seeks to allow that</p> <p>"where adverse effects on nature conservation values cannot be avoided, remedied or mitigated" Council will consider environmental compensation as an alternative.</p> <p>Given the need for accuracy around this wording, use of the word 'protect' may unnecessarily elevate policy 3.2.4.2.1 above policy 3.2.4.2.2. It is clear the intent is that the former is considered the primary policy, and Federated Farmers supports this tiered approach. However use of the word 'protect' in policy 3.2.4.2.1 runs the risk of rendering policy 3.2.4.2.2 of relatively little use.</p>	<p>words to similar effect)</p> <p>Identify areas of significant indigenous vegetation and significant habitats of indigenous fauna, referred to as Significant Natural Areas on the District Plan maps and ensure <u>these are avoided, remedied or mitigated</u> their protection.</p>
Policy 3.2.4.2.2 Where adverse effects on nature conservation values cannot be avoided, remedied or mitigated, consider environmental compensation as an alternative.	Support	<p>Federated Farmers supports this policy. Federated Farmers supports Council defining areas significant indigenous vegetation and significant habitats of indigenous fauna.</p> <p>Farmers and other resource users benefit where these areas are appropriately defined and reasonable rules, policies and objectives are developed around these.</p>	The policy is adopted as proposed.
Objective 3.2.4.3 Maintain or	Support	Federated Farmers supports this objective. Rare, endangered, or vulnerable species of indigenous plant or animal communities are of	The objective is adopted as proposed.

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
enhance the survival chances of rare, endangered, or vulnerable species of indigenous plant or animal communities.		importance to the district, and it is important that Council develop and adopt clear policies to provide for their survival.	
Policies 3.2.4.3.1 That development does not adversely affect the survival chances of rare, endangered, or vulnerable species of indigenous plant or animal communities	Support in part	<p>Federated Farmers supports this policy in part. While rare, endangered, or vulnerable species of indigenous plant or animal communities are of importance to the district, it is important that Council develop and adopt clear policies in this area..</p> <p>As worded there may be some confusion around implementation of the policy, in that a degree of significance may be required. For example, a farmer who clears an area of pasture which has a small example of a species may not be aware of the presence of that species, and the impact may not be significant as it may be an isolated example, not a community. Subsequently the farmer may not have undermined the survival of that species to any significant extent. Yet such an act may be considered to be contrary to the policy under the proposed wording.</p> <p>If it is clear that an action either intentionally or unintentionally adversely affects the survival chances, in either a direct or a cumulative sense, then Federated Farmers agrees the policy is important, however we seek rewording to introduce a degree of significance to the policy.</p>	<p>Policy 3.2.4.3.1 is reworded as follows (or words to similar effect):</p> <p>That development does not <u>significantly adversely affect, either directly or cumulatively,</u> the survival chances of rare, endangered, or vulnerable species of indigenous plant or animal communities</p>
Objective 3.2.4.4 Avoid exotic vegetation with the potential to spread and naturalise.	Support in part	Federated Farmers agrees that it is important to manage exotic vegetation with the potential to spread and naturalise. However, where the risks are appropriately managed the adverse effects of exotic plants can be negligible at best.	<p>Objective 3.2.4.4 is reworded as follows (or words to similar effect):</p> <p><u>Avoid or manage the effects of,</u> exotic vegetation with the potential to spread and naturalise.</p>

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
<p>Policy 3.2.4.4.1 That the planting of exotic vegetation with the potential to spread and naturalise is banned.</p>	<p>Oppose in part</p>	<p>Federated Farmers agrees that it is important to manage exotic vegetation with the potential to spread and naturalise. However, where the risks are appropriately managed the adverse effects of exotic plants can be negligible at best.</p> <p>This is particularly the case in relation to species of pines (wilding pines). These are a useful and often necessary tool in areas of the District, particularly for shelter. However they are also a recognised and particularly costly pest plant for farmers.</p> <p>Subsequently Federated Farmers seeks a balanced approach which allows for the use of wilding pines in isolated and well managed areas, while ensuring the adverse effects of the plant are appropriately managed. This could require a resource consent for the planting of a grove or stand of wilding pines in the rural area, with the conditions of that consent setting out the management obligations of the consent holder in relation to the pest plant attributes and risk associated with the planting.</p>	<p>Policy 3.2.4.4.1 is reworded as follows (or words to similar effect):</p> <p>That the planting of exotic vegetation with the potential to spread and naturalise is banned <u>appropriately managed with associated risks reduced</u>.</p>
<p>Policy 3.2.4.5.1 That subdivision and / or development which may have adverse effects on the natural character and nature conservation values of the District's lakes, rivers, wetlands and their beds and margins be carefully managed so that</p>	<p>Support</p>	<p>Development can have some adverse effects on the natural character and nature conservation values of the District's lakes, rivers, wetlands and their beds and margins. At the same time, development (for example, development of pasture for grazing) can be of significant benefit to the landowner and the wider district.</p> <p>It is appropriate that the adverse effects of this development are carefully managed to provide for an appropriate balance between these tensions.</p>	<p>The policy is adopted as proposed.</p>

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life-supporting capacity and natural character is maintained or enhanced.			
Objective 3.2.4.6 Maintain or enhance the water quality and function of our lakes, rivers and wetlands	Oppose in part	<p>Otago Regional Council has the primary function for managing, maintaining or improving (where required) the water quality of the Otago region.</p> <p>While Queenstown Lakes District Council does have important roles to play (particularly as an infrastructure owner and provider, land use, advocate), it is important that the District Plan does not 'double up' on this regulation.</p> <p>Federated Farmers recognises Council does have a role to play in respect to the functioning of lakes, rivers and wetlands and we recommend the objective is reworded to this effect.</p>	<p>Objective 3.2.4.6 is reworded as follows (or words to similar effect):</p> <p>Maintain or enhance the water quality and function of our lakes, rivers and wetlands</p>
Policy 3.2.4.6.1 That subdivision and / or development be designed so as to avoid adverse effects on the water quality of lakes, rivers and wetlands in the District.	Oppose in part	<p>Otago Regional Council has the primary function for managing, maintaining or improving (where required) the water quality of the Otago region.</p> <p>While Queenstown Lakes District Council does have important roles to play (particularly as an infrastructure owner and provider, land use, advocate), it is important that the District Plan does not 'double up' on this regulation.</p> <p>Federated Farmers considers the key area of concern is urban development and subdivision, and we ask that Council re-word the policy appropriately.</p>	<p>Policy 3.2.4.6.1 is reworded as follows (or words to similar effect):</p> <p>That subdivision and / or <u>urban</u> development be designed so as to avoid adverse effects on the water quality of lakes, rivers and wetlands in the District.</p>
Objective 3.2.4.7 Facilitate public access to the natural environment.	Support in part	<p>Federated Farmers agrees that it is important to facilitate access where there is new development or subdivision. However the objective as currently worded could be considered to oblige Council to facilitate public access in a wider sense. As access to the natural environment often occurs across private land in the rural area, and there are risks associated (to both the landowner and those seeking access) it is appropriate that that access is</p>	<p>Objective 3.2.4.7 is reworded as follows (or words to similar effect):</p> <p>Facilitate public access to the natural environment <u>where this is likely to be impeded by subdivision or development.</u></p>

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
		<p>negotiated between the landowner and those seeking access as and where appropriate.</p> <p>It appears the focus of the objective (given policy 3.2.4.7.1) relates to subdivision and urban development. Therefore we ask that Objective 3.2.4.7 is reworded to reflect this, and to provide clarity.</p>	
<p>Policy 3.2.4.7.1 Opportunities to provide public access to the natural environment are sought at the time of plan change, subdivision or development.</p>	<p>Support</p>	<p>Federated Farmers agrees this is appropriate.</p>	<p>The policy is adopted as proposed.</p>
<p>3.2.5 Goal - Our distinctive landscapes are protected from inappropriate development.</p>	<p>Support</p>	<p>Federated Farmers agrees that the focus should be on protecting distinctive landscapes from development that is inappropriate.</p>	<p>The goal is adopted as proposed.</p>
<p>Objective 3.2.5.1 Protect the natural character of Outstanding Natural Landscapes and Outstanding Natural Features from subdivision,</p>	<p>Support in part</p>	<p>Federated Farmers agrees that it is important to protect the natural character of the district's Outstanding Natural Landscapes and Outstanding Natural Features.</p> <p>However, we believe the Objective should be reworded to better reflect the Goal (inappropriate development) and that this objective should focus on protecting distinctive landscapes from development that is inappropriate.</p>	<p>Objective 3.2.5.1 is reworded as follows (or words to similar effect):</p> <p>Protect the natural character of Outstanding Natural Landscapes and Outstanding Natural Features from subdivision, <u>inappropriate use</u> and development.</p>

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
use and development.			
Policy 3.2.5.1.1 Identify the district's Outstanding Natural Landscapes and Outstanding Natural Features on the District Plan maps, and protect them from the adverse effects of subdivision and development.	Support in part	Federated Farmers agrees that it is important to identify the natural character of the district's Outstanding Natural Landscapes and Outstanding Natural Features and to ensure these landscapes and features are appropriately managed, particularly in respect to subdivision. However, we believe the policy should be reworded to better reflect the Goal (inappropriate development).	Policy 3.2.5.1.1 is reworded as follows (or words to similar effect): Identify the district's Outstanding Natural Landscapes and Outstanding Natural Features on the District Plan maps, and protect them from the adverse effects of subdivision and <u>inappropriate</u> development.
Objective 3.2.5.2 Minimise the adverse landscape effects of subdivision, use or development in specified Rural Landscapes.	Support	Federated Farmers agrees that it is important to minimise the adverse landscape effects of subdivision, use or development in specified rural landscapes.	The objective is adopted as proposed.
Objective 3.2.5.3 Direct new subdivision, use or development to occur in those	Support in part	Federated Farmers agrees the proposed objective and policy 3.2.5.3.1 will address concerns in relation to urban development in the rural area. However, the subsequent policy 3.2.5.3.1 refers specifically to urban development. In order to ensure there is clarity in the relationship between	Objective 3.2.5.3 is reworded as follows (or words to similar effect): Direct new subdivision, <u>and urban</u> use or development to occur in those areas which

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
areas which have potential to absorb change without detracting from landscape and visual amenity values.		the objective and the subsequent policy we ask the objective is reworded to reflect this focus.	have potential to absorb change without detracting from landscape and visual amenity values.
Objective 3.2.5.4 Recognise there is a finite capacity for residential activity in rural areas if the qualities of our landscape are to be maintained.	Support	Federated Farmers agrees it is appropriate to recognise the finite capacity for residential activity in the rural areas if the qualities of the District's landscape are to be maintained.	The objective is adopted as proposed.
Policy 3.2.5.4.2 Provide for rural living opportunities in appropriate locations.	Support	It is important that the development of rural areas is not unnecessarily hindered where there are appropriate locations for living opportunities with no significant adverse effects.	The policy is adopted as proposed.
Objective 3.2.5.5 Recognise that agricultural land use is fundamental to the character of our landscapes.	Support	Federated Farmers supports the proposed objective. It is important that agricultural land use is not only to be expected and provided for in the rural areas of the District, but that this land use is also recognised as overall positively contributing to the visual and other amenity values that are inherently attractive to those who live in, work in and visit the District. Farmers take pride in the role they play in providing for these sweeping landscapes and the way rural culture contributes to the District, and these positive aspects are all underpinned by the ability to make reasonable land	The objective is adopted as proposed.

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
		use decisions in rural areas.	
Policy 3.2.5.5.1 Give preference to farming activity in rural areas except where it conflicts with significant nature conservation values.	Support	Federated Farmers supports the proposed policy. It is important that agricultural land use is considered the primary focus of the rural areas of the District, particularly given the role of farming and farmers to the maintenance of the district's cultural, economic and social wellbeing, and the potential for tensions if farming activities are not appropriately provided for. We also support a degree of significance being included in the wording of the policy in respect to nature conservation values; we consider it is necessary to find a reasonable balance.	The policy is adopted as proposed.
Policy 3.2.5.5.2 Recognise that the retention of the character of rural areas is often dependent on the ongoing viability of farming and that evolving forms of agricultural land use which may change the landscape are anticipated.	Support	Federated Farmers considers the retention of the character of rural areas is entirely dependent on the ongoing viability of farming. Farmers need the ability to evolve their practices and land use as appropriate, and some of this may require changes to the rural working landscape.	The policy is adopted as proposed.
3.2.7 Goal - Council will act in accordance with the principles of the Treaty of	Support	Federated Farmers recognises the important role Ngai Tahu has to play in relation to the District's resource management and supports a principle focussed partnership.	The goal is adopted as proposed.

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
Waitangi and in partnership with Ngai Tahu.			

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
CHAPTER 4: URBAN DEVELOPMENT			
Policy 4.2.3.7 The edges of Urban Growth Boundaries are managed to provide a sensitive transition to rural areas.	Support	Federated Farmers supports the proposed policy and the overall planning approach for development within the urban chapter. It is important that urban development in the district is well planned for and implemented. Not only does urban sprawl or poorly defined urban development place additional costs on council and ratepayers, it impacts the values within the rural area, and can result in reverse sensitivity issues and adversely impact primary production.	The policy is adopted as proposed.

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
CHAPTER 5: TANGATA WHENUA			
5.1 Purpose	Support	Federated Farmers recognises the important role Tangata Whenua has to play in relation to the District's resource management. We support an approach which relies on Council and Iwi defining this	The purpose is adopted as proposed.

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
		relationship on an 'as needed' basis, based on a principle of partnership. Overall we support the content of the chapter as it explains the overall role of Tangata Whenua in the District, and matters of importance in a clear and concise manner.	
5.3 Issues and Outcomes sought by Ngāi Tahu... ... Issues • Increasing land use intensification, especially increasing dairying and subdivision.	Oppose in part	Federated Farmers broadly supports the intention to specify key Ngāi Tahu concerns within this chapter. However, the inclusion of dairying and subdivision without qualification is strikingly precise, particularly for a district plan which will be operative for some years. It is unfair (and arguably inaccurate given Ngāi Tahu's commercial arm includes ownership of dairy farms) to single out specific land uses in a district plan. Presumably the concerns are with adverse effects, not with the land uses themselves. Further, the outcomes sought do not extend naturally from these issues; one of the outcomes sought, for instance, is not "no further land use change to dairying". Subsequently we would support Council re-wording the issue to focus on the effects that are of concern to Ngāi Tahu, not a sweeping generalisation against specific land uses irrespective of the actual impact of each instance of land use.	The issues are re-written to specify the environmental effects that are of concern to Ngāi Tahu, not simply specifying particular land uses.

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
CHAPTER 6: LANDSCAPES			
6.2 Values	Support	The Values section of this chapter recognises the critical role of farming and pastoral land as a contributing factor to the positive landscape values in the District, particularly in the following paragraph: <i>The open character of productive farmland is a key element of the landscape character which can be vulnerable to degradation from</i>	The Values section is adopted as proposed.

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
		<p><i>subdivision, development and non-farming activities. The prevalence of large farms and landholdings contributes to the open space and rural working character of the landscape. The predominance of open space over housing and related domestic elements is a strong determinant of the character of the District's rural landscapes.</i></p> <p>This paragraph extends upon the provisions contained within the proposed strategic direction, particularly</p> <ul style="list-style-type: none"> - <i>Objective 3.2.5.5 Recognise that agricultural land use is fundamental to the character of our landscapes.</i> - <i>Policy 3.2.5.5.1 Give preference to farming activity in rural areas except where it conflicts with significant nature conservation values.</i> - <i>Policy 3.2.5.5.2 Recognise that the retention of the character of rural areas is often dependent on the ongoing viability of farming and that evolving forms of agricultural land use which may change the landscape are anticipated.</i> <p>These provisions appropriately recognise that the rural area is in large part comprised of farming environments which are working environments and subject to some change.</p>	
<p>6.3.1 Objective - The District contains and values Outstanding Natural Features, Outstanding Natural Landscapes, and Rural Landscapes that require protection from</p>	<p>Support</p>	<p>Federated Farmers agrees that these landscapes require protection from inappropriate subdivision and development, particularly given the primacy of landscapes within the Queenstown Lakes District. We also support the qualifier of 'inappropriate', because as reflected in the subsequent proposed policies pastoral farming plays an important part in contributing to the character of the landscape.</p>	<p>The Objective is adopted as proposed.</p>

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
inappropriate subdivision and development.			
Policy 6.3.1.10 Recognise that low-intensity pastoral farming on large landholdings contributes to the District's landscape character.	Support	<p>It is important that the District Plan recognise the important role pastoral farming plays in managing and providing the rural landscape for the benefit of the District's residents and visitors.</p> <p>It is also important that the District Plan recognise that the rural environment is a working environment with operating farms which have to adapt as needed, and that these working landscapes are privately owned and underpinned by and funded entirely by economic fundamentals.</p> <p>It is not immediately clear why there needs to be a reference to the size of a landholding within this policy. Apart the additional requirements of a building or buildings for the purpose of rural residence, the size of the landholding has no significant impact. Nor is 'large landholding' defined in the district plan. Large landholdings result from pastoral farming in the District because smaller landholdings are largely economically unviable from a pastoral perspective. Therefore while we fully support the policy we suggest references to the size of the landholding is removed.</p>	<p>Policy 6.3.1.10 is re-written as follows (or words to similar effect):</p> <p>Recognise that low-intensity pastoral farming on large landholdings contributes to the District's landscape character.</p>
Policy 6.3.1.11 Recognise the importance of protecting the landscape character and visual amenity values, particularly as viewed from public places.	Oppose in part	<p>While we support the underlying intention is to value landscape character and visual amenity values, the wording of the proposed policy to an extent contradicts Policy 6.3.1.10.</p> <p>A large proportion of landscape character and visual amenity values are present on actively farmed pastoral blocks. These working areas are subject to constant change, and this change underpins, rather than adversely impacts, the landscape character and visual amenity values. Without such provision, pest and weed control can become a severe issue, perversely negatively impacting on those very landscapes.</p> <p>As a result 'protecting' what are effectively working landscapes is a problematic goal. A working landscape can not be subject to onerous</p>	<p>Policy 6.3.1.11 is re-written as follows (or words to similar effect):</p> <p>Recognise the importance of protecting the landscape character and visual amenity values, particularly as viewed from public places, <u>while providing for low-intensity pastoral farming in the rural zone.</u></p>

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
		<p>protection, or it effectively ceases being a working rural landscape and instead becomes a regulated landscape, undermining what makes that landscape valued in the first case.</p> <p>This is particularly an issue when the landscape character and visual amenity values are considered to be worthy of protection over large geographical distances, because they can be viewed over these distances. If this is the case, the provisions controlling what does and does not occur within these areas must reflect that they are working environments, subject to some change.</p>	
<p>6.3.2 Objective - Avoid adverse cumulative effects on landscape character and amenity values caused by incremental subdivision and development.</p>	<p>Support in part</p>	<p>Federated Farmers considers the primary concern relates to inappropriate development.</p>	<p>Objective 6.3.2 is re-written as follows (or words to similar effect):</p> <p>Avoid adverse cumulative effects on landscape character and amenity values caused by incremental subdivision and <u>inappropriate</u> development.</p>
<p>Policy 6.3.2.1 Acknowledge that subdivision and development in the rural zones, specifically residential development, has a finite capacity if the District's landscape</p>	<p>Support in part</p>	<p>Federated Farmers considers the primary concern relates to incompatible development in the rural zones.</p>	<p>Policy 6.3.2.1 is re-written as follows (or words to similar effect):</p> <p>Acknowledge that subdivision and <u>incompatible</u> development in the rural zones, specifically residential development, has a finite capacity if the District's landscape quality, character and amenity values are to be sustained.</p>

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
quality, character and amenity values are to be sustained.			
<p>Policy 6.3.2.3 Recognise that proposals for residential subdivision or development in the Rural Zone that seek support from existing and consented subdivision or development have potential for adverse cumulative effects. Particularly where the subdivision and development would constitute sprawl along roads.</p>	Support in part	<p>Federated Farmers agrees that the cumulative impacts of a proposal, or the potential for sprawl within the District, can have adverse effects and therefore should be considered. However, in respect to development we consider the primary concern relates to inappropriate development. Development that is compatible with, or as a result of, pastoral farming should be expected in the working rural environment, provided there are no significant or cumulatively significant adverse effects.</p>	<p>Policy 6.3.2.3 is re-written as follows (or words to similar effect):</p> <p>Recognise that proposals for residential subdivision or <u>inappropriate</u> development in the Rural Zone that seek support from existing and consented subdivision or development have potential for adverse cumulative effects. Particularly where the subdivision and development would constitute sprawl along roads.</p>
6.3.3 Objective - Protect, maintain or enhance the district's Outstanding Natural Features	Support	<p>Federated Farmers recognises the importance of the District's ONFs to residents and visitors. It is appropriate that the objective provides scope for Council to decide whether protection, maintenance or enhancement of these ONFs is appropriate, on a case by case basis.</p>	The Objective is adopted as proposed.

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
(ONF).			
6.3.4 Objective - Protect, maintain or enhance the District's Outstanding Natural Landscapes (ONL).	Support	Federated Farmers recognises the importance of the District's ONLs to residents and visitors. It is appropriate that the objective provides scope for Council to decide whether protection, maintenance or enhancement of these ONLs is appropriate, on a case by case basis, particularly as a large proportion of ONLs occur on working pastoral farms.	The Objective is adopted as proposed.
Policy 6.3.4.2 Recognise that large parts of the District's Outstanding Natural Landscapes include working farms and accept that viable farming involves activities which may modify the landscape, providing the quality and character of the Outstanding Natural Landscape is not adversely affected.	Support	Federated Farmers wholly supports the intent of this policy. A large proportion of ONLs are present on actively farmed pastoral blocks. These working areas are subject to constant change, and this change underpins, rather than adversely impacts, the landscape character and visual amenity values. A working landscape can not be subject to onerous protection, or it ceases to be a working rural landscape; a balance is required.	Policy 6.3.4.2 is adopted as proposed

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
Policy 6.3.4.3 Have regard to adverse effects on landscape character, and visual amenity values as viewed from public places, with emphasis on views from formed roads.	Support	<p>Federated Farmers supports the proposed policy, on the basis that it is considered with equal weighting in respect to Policy 6.3.4.2.</p> <p>We expect a material benefit of the implementation of the policy will be that there is greater flexibility provided for areas of the rural environment which are not able to be viewed from formed roads.</p> <p>Council should however recognise that the requirement for tighter emphasis on those areas which can be viewed from formed roads in effects creates winners and losers among farmers; obligations and expectations for those in proximity to formed roads will be higher. This is not an issue to be addressed through the District Plan, but could be considered in respect to rates relief.</p>	Policy 6.3.4.3 is adopted as proposed
6.3.5 Objective - Ensure subdivision and development does not degrade landscape character and diminish visual amenity values of the Rural Landscapes (RLC).	Support	<p>Federated Farmers supports Council's recognition that pastoral farming is of significant value, both to the District and through the provision of rural landscapes. We subsequently support Objectives and policies which seek to define and target what is considered to be inappropriate activities in the rural areas.</p>	Objective 6.3.5 is adopted as proposed.
Policy 6.3.7.2 Avoid indigenous vegetation clearance where it would significantly degrade the	Support	<p>Federated Farmers recognises the importance of indigenous vegetation clearance to the district, and we support an approach which avoids vegetation clearance where this will result in significant degradation of visual character and qualities.</p>	Policy 6.3.7.2 is adopted as proposed.

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
visual character and qualities of the District's distinctive landscapes.			

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
CHAPTER 21: RURAL			
21.1 Zone Purpose	Support	<p>Federated Farmers fully supports the Zone Purpose as stated. This recognises that the primary purpose of the rural zone to enable farming activities while protecting, maintaining and enhancing the natural features of the rural area. The purpose also appropriately recognises that a wide range of productive activities occur in the Rural Zone and that there are mutually compatible and reliant industries also situated in proximity to primary production activities.</p> <p>Federated Farmers fully supports the following paragraph to this purpose: <i>The long term sustainability of pastoral farming will depend upon farmers being able to achieve economic returns from utilising the natural and physical resources of their properties. For this reason, it is important to acknowledge the potential for a range of alternative uses of farm properties that utilise the qualities that make them so valuable.</i></p> <p>It is also important that the District Plan recognise the impact that regulation may have on these economic returns and long term sustainability. In submitting to this plan we seek to ensure that the provisions relating to primary production are cognisant of this potential cost impact, and this concern is reflected throughout our submissions to the rural chapter in</p>	The Zone Purpose is adopted as proposed.

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
		particular.	
21.2.1 Objective - Enable farming, permitted and established activities while protecting, maintaining and enhancing landscape, ecosystem services, nature conservation and rural amenity values.	Support	The objective seeks to strike an appropriate balance between enabling farming activities while protecting, maintaining and enhancing important rural amenity values.	The Objective is adopted as proposed.
Policy 21.2.1.1 Enable farming activities while protecting, maintaining and enhancing the values of indigenous biodiversity, ecosystem services, recreational values, the landscape and surface of lakes and rivers and	Support in part	We support the policy, in particular the proposal to enable farming activities while protecting, maintaining and enhancing important rural amenity values and services.	The Policy is adopted as proposed.

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
their margins.			
<p>Policy 21.2.1.2 Provide for Farm Buildings associated with larger landholdings where the location, scale and colour of the buildings will not adversely affect landscape values.</p>	<p>Support</p>	<p>Federated Farmers supports the intention to provide for farm buildings, which are important components of the farming operation.</p>	<p>Policy 21.2.1.2 is adopted as proposed.</p>
<p>Policy 21.2.1.3 Require buildings to be set back a minimum distance from internal boundaries and road boundaries in order to mitigate potential adverse effects on landscape character, visual amenity, outlook from neighbouring properties and to avoid adverse</p>	<p>Support</p>	<p>Reverse sensitivity and impacts on visual amenity are important considerations in respect to new buildings within the District. It is important Council develops appropriate setbacks for these buildings.</p>	<p>Policy 21.2.1.3 is adopted as proposed.</p>

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
effects on established and anticipated activities.			
Policy 21.2.1.4 Minimise the dust, visual, noise and odour effects of activities by requiring facilities to locate a greater distance from formed roads, neighbouring properties, waterbodies and zones that are likely to contain residential and commercial activity.	Support	The requirement to site facilities appropriately to avoid impacting activities which are yet to be developed may appear an onerous obligation. However, Council's zoning approach requires identifying and planning for certain areas of land for future development. Given the risks of reverse sensitivity between the rural zone and other zones, and within the rural zone, it is important that new facilities are not built in a manner that will over time give rise to reverse sensitivity issues.	Policy 21.2.1.4 is adopted as proposed.
Policy 21.2.1.5 Have regard to the location and direction of lights so they do not cause glare to other properties, roads, public places or the	Support	Federated Farmers is aware of concerns around the siting and impact of the direction of lights in the rural zone (for instance, irrigation). We appreciate that there are concerns both around the impact of these lights, and on the other hand with the cost impact of restricting the use of lights. On balance, given the particular nature of the District we consider it is reasonable for Council to 'have regard to' the impact of lights in the rural zone and believe the policy is appropriately worded.	Policy 21.2.1.5 is adopted as proposed.

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
night sky.			
Policy 21.2.1.6 Avoid adverse cumulative impacts on ecosystem services and nature conservation values.	Support in part	While we support the intent of the policy, we believe for the purpose of implementation it would be useful to introduce a degree of significance.	Policy 21.2.1.6 is reworded as follows (or words to similar effect): Avoid <u>significant</u> adverse <u>cumulative</u> impacts on ecosystem services and nature conservation values, <u>either directly or cumulatively</u> .
Policy 21.2.2.1 Allow for the establishment of a range of activities that utilise the soil resource in a sustainable manner.	Support	Federated Farmers supports a policy specifically allowing for a range of activities where these do not adversely impact the soil resource.	Policy 21.2.2.1 is adopted as proposed.
Policy 21.2.2.2 Maintain the productive potential and soil resource of Rural Zoned land and encourage land management practices and activities that benefit soil and	Support	Federated Farmers agrees the focus should be on protecting the productive potential of the soil resource in the rural zone through the planning response, and that the primary focus should be on Council encouraging, rather than regulating for, positive activities.	Policy 21.2.2.2 is adopted as proposed.

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
vegetation cover.			
Policy 21.2.2.3 Protect the soil resource by controlling activities including earthworks, indigenous vegetation clearance and prohibit the planting and establishment of recognised wilding exotic trees with the potential to spread and naturalise.		<p>Federated Farmers agrees that it is important to protect the soil resource (to a reasonable degree) from activities which will reduce or hinder the soil's productive capacity.</p> <p>However, we do believe there is some scope for the risks associated with vegetation clearance and the use of wilding exotic trees to be managed, rather than taking too strong a regulatory hand.</p> <p>For instance, vegetation clearance should be provide for as long as it is smaller scale and does not either directly or cumulatively significantly adversely impact the soil resource.</p> <p>In addition we believe there is scope for Council to take a more balanced approach in respect to exotic wilding trees, where the issue is managed rather than prohibited.</p>	<p>Policy 21.2.2.3 is reworded as follows (or words to similar effect):</p> <p>Protect the soil resource by controlling activities including earthworks, <u>and appropriately managing the effects of</u> indigenous vegetation clearance and prohibit the planting and establishment of recognised wilding exotic trees with the potential to spread and naturalise.</p>
21.2.3 Objective - Safeguard the life supporting capacity of water through the integrated management of the effects of activities.	Support in part	Federated Farmers agrees Council has some role to play in respect to this matter, but we consider that the primary responsibility lies with Otago Regional Council.	Objective 21.2.3 is adopted as proposed, but the subsequent policies retain clear role definitions between Queenstown Lakes District Council and Otago Regional Council.
Policy 21.2.3.1 In conjunction with	Support in part	Federated Farmers recognises that Council has a role to play in respect to water quantity, particularly as this pertains to the attractiveness of the	Policy 21.2.3.1 is reworded as follows (or words

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
<p>the Otago Regional Council, regional plans and strategies:</p> <ul style="list-style-type: none"> • Encourage activities that use water efficiently, thereby conserving water quality and quantity; • Discourage activities that adversely affect the potable quality and life supporting capacity of water and associated ecosystems. 		<p>District to residents and visitors, and the ability for residents to source clean water supplies for drinking and other activities, as needed.</p> <p>In terms of implementation of this purpose we underline the importance of distinguishing between Council’s roles (infrastructure owner and provider, land use, advocate) and that of the regional council (regulator), particularly given Otago Regional Council has an operative water plan in place which sets out the water quality responsibilities of rural resource users in the region.</p> <p>We would not like to see, for example, additional regulatory requirements developed through the District Plan which in effect created two sets of regulation for farmers to meet in respect to water quantity or quality. We would also question what regulatory ‘levers’ Council could pull given the primacy given to regional regulation of these concerns.</p> <p>We support the focus on ‘encouraging’ and ‘discouraging’ and consider Council has a role to play in respect to advocacy and information provision, and as an owner of related infrastructure. However, we seek rewording of this policy to better clarify what we consider to be the Council’s primary roles considering regional council’s functions. In particular, that it is the potable quality and availability of water which are the primary concerns.</p>	<p>to similar effect):</p> <p>Policy 21.2.3.1 In conjunction with the Otago Regional Council, regional plans and strategies:</p> <ul style="list-style-type: none"> • Encourage activities that use water efficiently, thereby conserving water quality and quantity; • Discourage activities that adversely affect the potable quality and life supporting capacity of water and associated ecosystems.
<p>21.2.4 Objective - Manage situations where sensitive activities conflict with existing and anticipated activities in the Rural Zone.</p>	<p>Support</p>	<p>Federated Farmers supports the proposed Objective given the rural zone is primarily intended for rural and associated or compatible activities.</p>	<p>Objective 21.2.4 is adopted as proposed.</p>
<p>Policy 21.2.4.1 Recognise that</p>	<p>Support</p>	<p>It is important that the District Plan recognises that standard farming practices, and associated effects, should be expected to occur in the rural</p>	<p>Policy 21.2.4.1 is adopted as proposed.</p>

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
permitted and established activities in the Rural Zone may result in effects such as odour, noise, dust and traffic generation that are reasonably expected to occur and will be noticeable to residents and visitors in rural areas.		area.	
Policy 21.2.4.2 Control the location and type of non-farming activities in the Rural Zone, to minimise or avoid conflict with activities that may not be compatible with permitted or established activities.	Support	It is important that the District Plan gives primacy to farming activities in the rural area, and that the obligation to avoid conflict with these farming activities is on those new potentially incompatible activities.	Policy 21.2.4.2 is adopted as proposed.
21.2.9 Objective - Ensure commercial	Support	It is important that the District Plan gives primacy to farming activities in the rural area, and that the obligation to avoid conflict with these farming	Objective 21.2.9 is adopted as proposed.

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
activities do not degrade landscape values, rural amenity, or impinge on farming activities.		activities is on those new potentially incompatible activities.	
Policy 21.2.9.5 Limit forestry to species that do not have any potential to spread and naturalise.	Support in part	The proposed definition for Forestry is: <i>Means the use of land primarily for the purpose of planting, tending, managing and harvesting of trees for timber or wood production in excess of 0.5ha in area.</i> Federated Farmers considers addressing the pest plant risks of exotic trees is best achieved through control of plantings of significant (or with the potential to be significant) scale, with the potential for smaller scale (eg shelter belts) plantings retained, if appropriately managed.	Policy 21.2.9.5 is reworded as follows (or words to similar effect): Limit <u>exotic</u> forestry to species that do not have any potential to spread and naturalise.
21.2.10 Objective - Recognise the potential for diversification of farms that utilises the natural or physical resources of farms and supports the sustainability of farming activities.	Support	Primary production activities in the District are underpinned by the ability to adapt to commercial opportunities and diversify as required. Federated Farmers supports the District Plan specifically recognising these opportunities and the way they may better enable farmers to provide for the District's wellbeing.	Objective 21.2.10 is adopted as proposed
21.2.10.1 Encourage revenue	Support	Primary production activities in the District are underpinned by the ability to adapt to commercial opportunities and diversify as required. Federated Farmers supports the District Plan specifically recognising these	Policy 21.2.10.1 is adopted as proposed

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
producing activities that can support the long term sustainability of farms in the district.		opportunities and the way they may better enable farmers to provide for the District's wellbeing.	
21.2.10.3 Recognise that the establishment of complementary activities such as commercial recreation or visitor accommodation located within farms may enable landscape values to be sustained in the longer term. Such positive effects should be taken into account in the assessment of any resource consent applications.	Support	Primary production activities in the District are underpinned by the ability to adapt to commercial opportunities and diversify as required. Federated Farmers supports the District Plan specifically recognising these opportunities and the way they may better enable farmers to provide for the District's wellbeing.	Policy 21.2.10.3 is adopted as proposed
Policy 21.2.11.1 Recognise that	Support	Federated Farmers supports explicit recognition that informal airports are an appropriate activity within the rural environment. Informal airports are	Policy 21.2.11.1 is adopted as proposed

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<p>informal airports are an appropriate activity within the rural environment, provided the informal airport is located, operated and managed so as to minimise adverse effects on the surrounding rural amenity.</p>		<p>vital to the operation of primary production in the District, particularly given the large nature of operative farms. Informal airports and associated traffic movement are important for the viability of these farming operations and the wellbeing of rural people.</p>	
<p>21.2.13 Objective - Enable rural industrial activities within the Rural Industrial Sub Zones, that support farming and rural productive activities, while protecting, maintaining and enhancing rural character, amenity and landscape</p>	<p>Support</p>	<p>It is important to allow for rural industrial activities which provide support to farming and rural productive activities, while protecting, maintaining and enhancing rural character, amenity and landscape, within the rural industrial sub zone. This provides mutual benefit to both the supportive industry and primary production given the significant costs that would be associated with additional travel.</p>	<p>Objective 21.2.13 is adopted as proposed</p>

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values.			
Activities 21.4.2 Farming Activity that complies with the standards in Table 2.	Support	Federated Farmers supports a permitted activity approach to farming in the rural area, provided permitted activity criteria are met.	Activity 21.4.2 is adopted as proposed
General Standard 21.5.1 Setback from Internal Boundaries	Support	The standard proposes that the minimum setback of any building from internal boundaries shall be 15m, with a restricted discretionary status applying. We consider the criteria for the restricted discretionary status is relevant.	General Standard 21.5.1 is adopted as proposed
General Standard 21.5.2 Setback from Roads	Support	The standard proposes a minimum setback of any building from a road boundary shall be 20m, except, the minimum of any building setback from State Highway 6 between Lake Hayes and Frankton shall be 50m. The minimum setback of any building for other sections of State Highway 6 where the speed limit is 70 km/hr or greater shall be 40m. Buildings which do not meet this criteria are a restricted discretionary activity. Federated Farmers considers the criteria for this activity are reasonable.	General Standard 21.5.2 is adopted as proposed
General Standard 21.5.4 Setback of buildings from Water bodies	Support	Federated Farmers supports the proposal that any building shall be setback 20m from the bed of a wetland, river or lake will be a permitted activity. We support the use of a restricted discretionary activity for those buildings that do not meet these criteria and agree the factors to be considered are relevant.	General Standard 21.5.4 is adopted as proposed
General Standard 21.5.5 Dairy Farming (Milking Herds, Dry Grazing and Calf Rearing)	Support	Given the specific and particular nature of Queenstown Lakes District Federated Farmers agrees with the proposed permitted activity status for all new effluent holding tanks, effluent treatment and effluent storage ponds, shall be located at least 300 metres from any formed road or adjoining property is a reasonable one. We support the use of a restricted discretionary activity status where these	General Standard 21.5.5 is adopted as proposed

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		conditions will not be met, and we agree the factors to be considered are relevant.	
General Standard 21.5.6 Dairy Farming (Milking Herds, Dry Grazing and Calf Rearing)	Support	<p>Given the specific and particular nature of Queenstown Lakes District Federated Farmers agrees with the proposed permitted activity status for all new milking sheds or buildings used to house or feed milking stock to be located at least 300 metres from any adjoining property or formed road.</p> <p>We support the use of a discretionary activity status where these conditions will not be met.</p>	General Standard 21.5.6 is adopted as proposed
General Standard 21.5.7 Dairy Farming (Milking Herds, Dry Grazing and Calf Rearing)	Oppose	<p>The rule proposes that stock shall be prohibited from standing in the bed of, or on the margin of a water body.</p> <p>Federated Farmers is opposed to the rule because it may unnecessarily and unintentionally capture stock crossings, which have no or negligible impact, and because the proposed rule 'doubles up' to an extent on Otago Regional Council's Water Plan.</p> <p>Federated Farmers appreciates there are concerns in relation to stock access to waterways, particularly in terms of the impacts on soil.</p> <p>However, we consider the rule unnecessary for the following reasons:</p> <ul style="list-style-type: none"> • In terms of water quality, Otago Regional Council has and administers rules associated with stock access and pugging. • In respect to established or new dairy farms, this requirement is already in place under the Sustainable Dairying: Water Accord and through DairyNZ guidance. <p>Federated Farmers appreciates there are some 'gaps', even allowing for the mechanisms above. In particular where a pastoral property is used for the purpose of wintering, and waterways are not permanently fenced as a rule. However, the ORC stock access rules quite clearly set expectations for ensuring that any stock do not cause damage to the bank and bed of waterways.</p> <p>Furthermore, we believe specific issues such as winter grazing near waterways can be addressed by industry initiatives. For example, winter</p>	General Standard 21.5.7 is deleted

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		<p>grazing relies on a contractual arrangement between the dairy farmer and the grazer. Industry can develop guidance between these two parties that there will be appropriate restrictions placed on stock access to waterways. This will in turn drive behavioural change and ensure those grazing address the issue as of right.</p> <p>Also, the proposed prohibition of dairy stock from standing within a 3 m margin of water races and drains may in fact result in deterioration of landscape appearance through weed growth or rank grass from a lack of controlled grazing.</p> <p>Subsequently Federated Farmers seeks that the rule is deleted and a focus is given to a non-regulatory approach to addressing the issue, in partnership with industry good bodies and farmers.</p>	
21.5.14 Standards for Structures	Support	Federated Farmers considers these standards are reasonable given the specific allowance for post and rail, post and wire and post and mesh fences, including deer fences and any structure associated with farming activities as defined in this plan, in 21.5.14.1 and 21.5.14.2	Standard 21.5.14 is adopted as proposed
21.5.15 Standards for Buildings	Support	Federated Farmers supports the exclusion of Farm buildings from this rule.	Standard 21.5.15 is adopted as proposed
21.5.16 Building Size	Support	Federated Farmers supports the exclusion of Farm buildings from this rule.	Standard 21.5.16 is adopted as proposed
21.5.17 Building Height	Support	Federated Farmers supports the exclusion of Farm buildings from this rule.	Standard 21.5.17 is adopted as proposed
21.5.18 Standards for	Support	21.5.18 sets out the permitted activity standards for the construction, replacement or extension of a farm building. Should the farm building not	Standard 21.5.18 is adopted, however Council revisit and refine the restricted discretionary

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Farm Buildings		<p>meet these standards, the building will require a restricted discretionary activity consent.</p> <p>Federated Farmers agrees the standards are appropriate for permitted activity criteria, and that if these criteria are not met, Council should have the opportunity to assess the potential for or significance of the adverse effects of a building on the values outlined.</p> <p>We do have concerns with the rather open ended nature of the restricted discretionary criteria however. These are</p> <ul style="list-style-type: none"> • Rural Amenity values. • Landscape character. • Privacy, outlook and rural amenity from adjoining properties. • Visibility, including lighting. • Scale. • Location. <p>In effect the criteria are inclusive of a broad range of factors, raising the risk that an applicant under the restricted discretionary criteria will be faced with significant costs and uncertainty.</p> <p>Federated Farmers considers that, given the other criteria covers what we would consider to be the main issues in respect to a lack of compatibility in the rural area, Rural Amenity values are deleted from assessment criteria.</p>	<p>activity criteria, specifically through the removal of Rural Amenity values as a consideration under the criteria.</p>
Standard 21.5.19 Exterior colours of buildings	Support in part	<p>We agree there needs to be some clear guidance around the standards required, and we support a permitted activity approach. Farmers in the District indicate they appreciate the need to ensure buildings are compatible with landscape values.</p> <p>However, we have some concerns with the rather open ended nature of the restricted discretionary criteria however. These are</p> <ul style="list-style-type: none"> • External appearance. • Visual prominence from both public places and private locations. • Landscape character. 	<p>Standard 21.5.19 is adopted, however Council revisit and refine the restricted discretionary activity criteria, specifically through the removal of Visual amenity values as a consideration under the criteria.</p>

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
		<ul style="list-style-type: none"> • Visual amenity. <p>In particular the inclusion of 'visual amenity' opens the considerations up to a broad range of factors, many of which we believe are addressed in the preceding criteria. This in turn raises the risk that an applicant under the restricted discretionary criteria will be faced with significant costs and uncertainty.</p> <p>Federated Farmers considers that, given the other criteria covers what we would consider to be the main issues in respect to a lack of compatibility in the rural area, Visual Amenity is deleted from this assessment criteria.</p> <p>This leaves Council able to consider the visual appearance, prominence and compatibility with landscape character when considering whether or not to grant a RD consent, and we consider this is sufficient.</p>	
Standard 21.5.20 Building Height	Support	We support a permitted activity approach and consider the proposed limit of ten metres height is reasonable for a permitted activity status. The discretionary activity criteria are also reasonable.	Standard 21.5.20 is adopted as proposed
Standard 21.5.25 Informal Airports Located on Public Conservation and Crown Pastoral Land	Support	Federated Farmers supports the permitted activity standards, particularly 21.5.25.3 (that informal airports for emergency landings, rescues, fire-fighting and activities ancillary to farming activities) are permitted activities.	Standard 21.5.25 is adopted as proposed
21.5.26 Informal Airports Located on other Rural Zoned Land	Support	Federated Farmers supports the permitted activity standards. We wholly support standard 21.5.26.2 (that informal airports for emergency landings, rescues, fire-fighting and activities ancillary to farming activities) are permitted activities.	Standard 21.5.26 is adopted as proposed
21.6.1 Non-Notification of	Support	Federated Farmers considers it reasonable that consents for retail sales of farm and garden produce and handicrafts grown or produced on site, which	21.6.1 Non-Notification of Applications is adopted as proposed.

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Applications		do not meet the permitted activity under Rule 21.4.14, should be non-notified. We consider it reasonable that a consent application is notified where the access is onto a State highway, given the high incidence of non-resident (tourist) traffic in the District.	

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
CHAPTER 22: RURAL RESIDENTIAL AND RURAL LIFESTYLE			
22.2.2 Objective - Ensure the predominant land uses are rural, residential and where appropriate, visitor and community activities.	Support	These activities are to be expected in the Rural Residential and Rural Lifestyle Zones.	Objective 22.2.2 is adopted as proposed.
Policy 22.2.2.1 Provide for residential and farming as permitted activities, and recognise that	Support	Federated Farmers supports the proposal to provide for farming as a permitted activity in these zones.	Policy 22.2.2.1 is adopted as proposed.

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<p>depending on the location, scale and type, community activities may be compatible with and enhance the Rural Residential and Rural Lifestyle Zones.</p>			
<p>22.2.5 Objective - Manage situations where sensitive activities conflict with existing and anticipated rural activities.</p>	<p>Support</p>	<p>Given the potential for reverse sensitivity issues, it is important that it is clear that rural land uses are to be expected in the areas zoned rural residential and rural lifestyle.</p> <p>We consider this places an appropriate responsibility on residential and lifestyle properties in these zones to be aware of the potential for rural activities within these zones, and for primary production activities to occur in rural zones in proximity.</p>	<p>Objective 22.2.5 is adopted as proposed.</p>
<p>Policy 22.2.5.1 Recognise existing and permitted activities, including activities within the surrounding Rural Zone might result in effects such as odour, noise, dust and</p>	<p>Support</p>	<p>We consider it is appropriate that these activities, and the effects of these activities, are to be expected in the Rural Residential and Rural Lifestyle Zones, and that it is the responsibility of residential and lifestyle properties in these zones to be aware of the potential for these potential adverse effects.</p>	<p>Policy 22.2.5.1 is adopted as proposed.</p>

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traffic generation that are established, or reasonably expected to occur and will be noticeable to residents and visitors in rural areas.			

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CHAPTER 26: HISTORIC HERITAGE			
26.1 Purpose	Support	Federated Farmers supports the proposed purpose, which includes a focus on identifying and recognising heritage values, and sustainably managing these features.	The Purpose is adopted as proposed.
26.5.2 Objective - To provide for the sustainable use of historic heritage features.	Support	Federated Farmers considers it important that an objective (and related policies) recognise the importance of sustainable management of historic heritage features rather than simply attempting to 'protect' these, as overly onerous protection can over time undermine these values.	Objective 26.5.2 is adopted as proposed.
26.6.21 Activity Standards - Heritage landscapes	Support	Federated Farmers supports the exclusion of farm track access, fencing, firebreaks and public use tracks from the earthworks provisions applied under these standards in relation to heritage landscapes.	Activity 26.6.21 is adopted as proposed.

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CHAPTER 27: SUBDIVISION AND DEVELOPMENT			
27.1 Purpose	Support	<p>Federated Farmers appreciates the particular challenges Council faces in respect to subdivision and development.</p> <p>Council will be aware that zoning creates 'winners and losers' within the rural area, particularly given the differences in relative value between land used for pastoral farming, and the value of subdividing and developing rural land.</p> <p>However, Federated Farmers considers that overall developing a plan which defines what is appropriate land use within each of these zones, and developing permitted activity standards around this land use, is the 'least worst' way of addressing the myriad concerns, particularly given the tensions around development within the District.</p> <p>Subsequently we support the zone based approach to addressing the tensions relating to subdivision and development within the plan, and we ask Council to consider the equity concerns of farmers through other methods, for example rates relief and the use of appropriate rating tools to ensure the costs facing farmers remain reasonable.</p>	The Purpose is adopted as proposed.
27.2.6 Objective - Cost of services to be met by subdividers.	Support	The potential costs of new development are significant for both Council and ratepayers, and Federated Farmers considers it is reasonable for developers to shoulder those costs directly relating to this new development.	Objective 27.2.6 is adopted as proposed.
27.5 Rules - Standards for Subdivision	Support	Federated Farmers supports the proposal that there are no minimum lot areas for subdivision in the Rural areas in the District. Subdivision can take place in rural areas for a number of reasons, including succession, and we	The Standards for Subdivision Activities in the Rural zones is adopted as proposed.

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
Activities, Rural		agree Council can best address concerns around land use change, development and new buildings through those specific activities, not through subdivision.	
27.12 Financial Contributions	Support	Federated Farmers supports the intention that development contributions will be used to recover growth related capital expenditure from subdivision and development, and this extends to any costs over and above that which has already been paid in respect to financial contributions under the RMA.	The Policy is adopted as proposed.

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CHAPTER 28: NATURAL HAZARDS			
28.3.1 Objective - The effects of natural hazards on the community and the built environment are minimised to tolerable levels.	Support	<p>Federated Farmers considers the primary concerns for the District in relation to natural hazards are human related. We consider the wording of the Objective and subsequent policies reflect the focus is on protecting human wellbeing, ensuring that infrastructure, development and utilities are appropriately sited so as to minimise risk to human wellbeing, and that structures and earthworks are sited so as not to exacerbate the potential impacts of natural hazards.</p> <p>We consider this is an appropriate approach. We would not support a more onerous regulatory approach which unnecessarily captured uninhabited structures in the rural area as this would not be justified on the basis of the risk posed to human wellbeing.</p>	Objective 28.3.1 is adopted as proposed.
28.3.2 Objective - Development on land subject to	Support	Federated Farmers considers the primary concerns for the District in relation to natural hazards are human related. We consider the wording of the Objective and subsequent policies reflect the focus is on protecting	Objective 28.3.2 is adopted as proposed.

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natural hazards only occurs where the risks to the community and the built environment are avoided or appropriately managed or mitigated.		<p>human wellbeing, ensuring that infrastructure, development and utilities are appropriately sited so as to minimise risk to human wellbeing, and that structures and earthworks are sited so as not to exacerbate the potential impacts of natural hazards.</p> <p>We consider this is an appropriate approach. We would not support a more onerous regulatory approach which unnecessarily captured uninhabited structures in the rural area as this would not be justified on the basis of the risk posed to human wellbeing.</p>	

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CHAPTER 30: ENERGY AND UTILITIES			
30.2.6 Objective - The establishment, efficient use and maintenance of utilities necessary for the well-being of the community.	Support in part	<p>Federated Farmers supports the overall intent of this Objective. However, in implementing the Objective and subsequent policies it is important that Council consider that Energy generation and transmission activities are often sited on or nearby primary production land and can have adverse impacts on both primary production potential and landowners. This is particularly the case where infrastructure sited on primary production land is subject to an upgrade, and there is a change or expansion of the 'footprint' (and therefore adverse effect) on that land.</p> <p>Therefore it is important that the subsequent policies consider these adverse impacts, particularly when considering the impacts of an upgrade to generation or transmission infrastructure.</p>	Adopt the Objective as proposed, but address the potential adverse effects of generation or transmission infrastructure upgrades through the supporting policies.

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<p>30.2.6.2 Consider long term options and economic costs and strategic needs when considering alternative locations, sites or methods for the establishment or alteration of a utility.</p>	<p>Support in part</p>	<p>Federated Farmers agrees the maintenance or upgrading of a utility is necessary to ensure its on-going viability and efficiency. However, in respect to upgrades where there is a change or expansion of the ‘footprint’ (and therefore adverse effect) on that land, the impacts on landowners and primary production should also be considered.</p> <p>Given Policy 30.2.6.1 already requires Council to “recognise the need for maintenance or upgrading of a utility to ensure its on-going viability and Efficiency”, we believe amendment to 30.2.6.2 would provide some needed balance.</p>	<p>Policy 30.2.6.2 is amended as follows (or words to similar effect)</p> <p>Consider long term options, and economic costs and <u>strategic needs, and economic costs including those imposed on adversely impacted activities</u> when considering alternative locations, sites or methods for the establishment or alteration of a utility.</p>
<p>30.2.6.4 Provide for the sustainable, secure and efficient use and development of the electricity transmission network...</p>	<p>Support in part</p>	<p>Federated Farmers supports Council giving effect to the National Policy Statement on Electricity Transmission (NPSET). However the requirements set out under the NPSET apply only to the National Grid, or assets owned by Transpower, not distribution lines (or local lines).</p> <p>Both the National Grid and local lines provide some public good benefit to the Queenstown Lakes communities. However, primary production also provides both direct (primary production) and indirect (landscape, rural amenity) benefits.</p> <p>Federated Farmers considers it is reasonable to place appropriate controls on potentially sensitive activities in respect to the National Grid as required under the NPSET. However, we believe a more robust assessment of the costs of controls would be required if these same restrictions related to local lines.</p> <p>Council has not included a specific definition for “distribution” or “electricity transmission network” in the proposed definitions, and so as written the rules could be considered to apply to both the National Grid (which is defined) and other electricity transmission infrastructure.</p> <p>Subsequently we seek that policy 30.2.6.4 is amended to ensure these provisions apply only to electricity transmission infrastructure that is part of</p>	<p>Policy 30.2.6.4 is amended as follows (or words to similar effect):</p> <p>30.2.6.4 Provide for the sustainable, secure and efficient use and development of the electricity transmission network <u>National Grid</u>, including within the <u>National Grid</u> corridor, and to protect activities from the adverse effects of the <u>National Grid</u>, including by:</p> <ul style="list-style-type: none"> • Controlling the proximity of buildings, structures and vegetation to existing <u>National Grid</u> corridors • Discouraging sensitive activities from locating within or near to the electricity transmission <u>National Grid</u> Yard to minimise potential reverse sensitivity effects on the transmission network • Managing subdivision within or near to electricity transmission corridors <u>the National Grid Corridor</u> to achieve the outcomes of this policy to facilitate good amenity and urban

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		the National Grid, excluding other transmission lines.	design outcomes <ul style="list-style-type: none"> • Not compromising the operation or maintenance options or, to the extent practicable, the carrying out of routine and planned upgrade <u>associated with the National Grid</u>.
30.3.2.3 New Zealand Electrical Code of Practice for Electrical Safe Distances	Support	<p>This rule notes that: <i>Compliance with the New Zealand Electrical Code of Practice for Electrical Safe Distances (“NZECP 34:2001”) is mandatory under the Electricity Act 1992. All activities regulated by the NZECP 34, including any activities that are otherwise permitted by the District Plan must comply with this legislation.</i></p> <p>Federated Farmers supports reference to NZECP 34:2001 and, with the exception of the proposed rules associated with the National Grid specifically, we consider this sufficiently reduces risks to and from electricity transmission that does not comprise a part of the National Grid (ie local lines).</p>	‘30.3.2.3 New Zealand Electrical Code of Practice for Electrical Safe Distances’ is retained as proposed.
30.5.10 Buildings and Structures within the National Grid Yard	Support	<p>Federated Farmers supports the proposed permitted activity standards for activities within the National Grid Yard.</p> <p>We consider it is appropriate for these activities to be controlled within the National Grid Yard (effectively, 12m either side of the asset) rather than the National Grid Corridor (which is significantly wider, depending on the capacity of the line).</p> <p>We consider 30.5.10.4 (relating to non-habitable buildings or structures used for agricultural activities) defines appropriate standards for a permitted activity status for buildings and structures of this nature.</p>	30.5.10 Buildings and Structures within the National Grid Yard is adopted as proposed.
30.5.11 Earthworks within the National Grid	Support	<p>Federated Farmers supports the proposed permitted activity standards for earthworks within the National Grid Yard.</p> <p>We consider it is appropriate for these activities to be controlled within the</p>	30.5.11 Earthworks within the National Grid Yard is adopted as proposed.

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Yard		<p>National Grid Yard (effectively, 12m either side of the asset) rather than the National Grid Corridor (which is significantly wider, depending on the capacity of the line).</p> <p>We consider the permitted activity exclusions under 30.5.11.8 (Earthworks undertaken as part of agricultural activities or domestic gardening) and 30.5.11.9 (Repair sealing, resealing of an existing road, footpath, farm track or driveway) address concerns farmers would have otherwise had were these not explicitly permitted under the standards, and that it is appropriate that these are permitted.</p>	

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CHAPTER 33: INDIGENOUS VEGETATION AND BIODIVERSITY			
33.1 Purpose	Support	<p>Federated Farmers supports the intent that:</p> <p><i>Activities involving the efficient use of land including ski-field development within identified Ski Area Sub Zones, farming, fence, road and track construction can be reasonably expected to be undertaken providing such activities maintain or enhance the District's indigenous biodiversity values.</i></p>	This section is retained within the Purpose and reflected throughout the subsequent objectives, rules and policies.
33.2.1 Objective - Protect, maintain and enhance indigenous biodiversity.	Support in part	<p>Federated Farmers supports the intent of the Objective but seeks amendment to the wording to provide more flexibility for landowners and the Council, while reflecting the desire to ensure that the total stock and values derived from indigenous biodiversity do not reduce overall (as a bottom line).</p>	Objective 33.2.1 is rewritten as follows - Protect, maintain and <u>or</u> enhance <u>the stock of</u> indigenous biodiversity.

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Policy 33.2.1.1 Identify the District's Significant Natural Areas and schedule them in the District Plan, including the ongoing identification of Significant Natural Areas through resource consent applications, using the criteria set out in Policy 33.2.1.9.	Support	<p>Federated Farmers supports the clear identification and reasonable regulation of the District's SNAs.</p> <p>Farmers are keen to ensure they are contributing to the environmental wellbeing of the District, including the positive values derived from SNA areas.</p> <p>At the same time, they are keen to ensure that they have the flexibility to required to achieve the positive outcomes associated with rural and primary production, as captured in the proposed Strategic Direction to the District Plan and as captured in the overall intent of the proposed Rural Chapter (in essence, that pastoral farming and associated activities are important for, and should be provided for, the rural area).</p> <p>In order to fulfil these roles farmers need certainty around what they can and can not do, to ensure they can undertake standard and expected farming activities with a high degree of confidence, and where they are required to seek consent from the council, the process is as efficient and user friendly as possible while ensuring their responsibilities to the environment are met.</p>	Policy 33.2.1.1 is adopted as proposed.
33.2.1.2 Identify the District's rare or threatened indigenous species and schedule them in the District Plan to assist with the management of their protection.	Support	Federated Farmers agrees it is important to specifically identify rare or threatened indigenous species and target protection efforts towards these species.	Policy 33.2.1.2 is adopted as proposed.
33.2.1.3 Provide standards in the	Support	Federated Farmers agrees that where indigenous vegetation is not identified as a Significant Natural Area or threatened species there should	Policy 33.2.1.3 is adopted as proposed.

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<p>District Plan for indigenous vegetation that is not identified as a Significant Natural Area or threatened species, which are practical to apply and that permit the removal of a limited area of indigenous vegetation.</p>		<p>be some capacity for a reasonable amount of clearance, particularly for farming activities in the rural area.</p>	
<p>33.2.1.5 Recognise anticipated activities in rural areas such as farming and the efficient use of land and resources while having regard to the maintenance, protection or enhancement of indigenous biodiversity values.</p>	<p>Support</p>	<p>Federated Farmers considers it is important for Council to specifically recognise anticipated activities in rural areas such as farming and the efficient use of land and resources within this chapter.</p>	<p>Policy 33.2.1.5 is adopted as proposed.</p>

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<p>33.2.1.6 Encourage the long-term protection of indigenous vegetation and in particular Significant Natural Areas by encouraging land owners to consider non-regulatory methods such as open space covenants administered under the Queen Elizabeth II National Trust Act.</p>	<p>Support in part</p>	<p>Federated Farmers supports the intention to encourage the long-term protection of indigenous vegetation through open space covenants administered under the Queen Elizabeth II National Trust Act.</p> <p>However, in terms of effectiveness it is important Council consider the extent to which active management (for instance some grazing) may be achievable at least, or may in fact benefit, the species under protection.</p> <p>Farmers are increasingly concerned that for some species grazing and/or active management of areas of indigenous vegetation may be more effective.</p> <p>This does not detract from Council's overall intention; however it is important to bear in mind when implementing this policy that for some species active management may result in better outcomes rather than simply covenanting.</p>	<p>Policy 33.2.1.6 is adopted as proposed but consideration is given to the benefits of 'active management' of species, including grazing, where this is demonstrably of benefit to the species under protection.</p>
<p>33.2.1.7 Activities involving the clearance of indigenous vegetation are undertaken in a manner to ensure the District's indigenous biodiversity values are</p>	<p>Support</p>	<p>Federated Farmers considers this a reasonable policy which seeks to achieve the outcomes sought for the protection, maintenance or enhancement of indigenous vegetation in the District, while providing some flexibility around how this will occur.</p>	<p>Policy 33.2.1.7 is adopted as proposed.</p>

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protected, maintained or enhanced.			
33.2.1.8 Where the adverse effects of an activity on indigenous biodiversity cannot be avoided, remedied or mitigated, consideration will be given to whether there has been any compensation or biodiversity offset proposed and the extent to which any offset will result in a net indigenous biodiversity gain.	Support	Federated Farmers considers this a reasonable policy which seeks to achieve the outcomes sought for the protection, maintenance or enhancement of indigenous vegetation in the District, while providing some flexibility around how this will occur.	Policy 33.2.1.8 is adopted as proposed.
Policy 33.2.2.1 Avoid the clearance of indigenous vegetation within Significant Natural Areas	Support in part	Federated Farmers supports the proposed policy but we seek to ensure the wording provides some flexibility while retaining the intent.	Policy 33.2.2.1 is amended as follows (or words to similar effect): Avoid the clearance of indigenous vegetation within Significant Natural Areas that would reduce indigenous biodiversity values <u>overall</u> .

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that would reduce indigenous biodiversity values.			
Policy 33.2.2.2 Allow the clearance of indigenous vegetation within Significant Natural Areas only in exceptional circumstances and in circumstances where these activities will have a low impact or offer compensation commensurate to the nature and scale of the clearance.	Support in part	Federated Farmers supports the proposed policy but we seek to ensure the wording provides for Council to consider allowing the clearance of indigenous vegetation within Significant Natural Areas in both exceptional circumstances, or where there will be sufficient compensation.	Policy 33.2.2.2 is amended as follows (or words to similar effect): Allow the clearance of indigenous vegetation within Significant Natural Areas only in exceptional circumstances and <u>or</u> in circumstances where these activities will have a low impact or offer compensation commensurate to the nature and scale of the clearance.
Policy 33.2.2.3 Recognise that the majority of Significant Natural Areas are located within land used for	Support	Federated Farmers considers it is important that Council recognise and provide for these low to no impact activities in the rural areas.	Policy 33.2.2.3 is adopted as proposed.

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<p>farming activity and provide for small scale, low impact indigenous vegetation removal, stock grazing, the construction of fences and small scale farm tracks, and the maintenance of existing fences and tracks.</p>			
<p>Policy 33.2.3.2 Where the permanent removal of indigenous vegetation is proposed, encourage the retention or establishment of the same indigenous vegetation community elsewhere on the site.</p>	<p>Support</p>	<p>Federated Farmers supports the intention to allow for and encourage 'offsetting' of indigenous vegetation.</p>	<p>Policy 33.2.3.2 is adopted as proposed.</p>

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<p>Policy 33.2.3.3 Encourage the retention of indigenous vegetation in locations that have potential for regeneration, or provide stability, particularly where productive values are low, or in riparian areas or gullies.</p>	<p>Support</p>	<p>Federated Farmers considers it is effective and reasonable to encourage retention where there is potential for regeneration. We note these areas are also likely to be least productive in some farming situations and this may result in a win/win.</p>	<p>Policy 33.2.3.3 is adopted as proposed.</p>
<p>Policy 33.2.3.4 When considering the effects of proposals for the clearance of indigenous vegetation, have particular regard to whether threatened species are present, or the area to be cleared is within a land environment (defined by the Land</p>	<p>Oppose in part</p>	<p>Federated Farmers considers the primary focus should be on developing indigenous vegetation rules that seeks to identify and protect species based on how threatened or endangered that species is, and/or the intrinsic value of that species.</p> <p>While we appreciate the role Land Environments of New Zealand at Level IV (LENZ) can play in respect to providing an environmental classification system, we note that this is only intended to underpin an overall approach to addressing conservation and resource management issues. We are not comfortable with LENZ being used at the pointy end of regulation as is proposed in this policy.</p> <p>This in effect adds an additional layer to the overall approach to the protection, maintenance or enhancement of indigenous vegetation in the District, and as a result rather than providing clarity to the District's resource users, potentially reduces this clarity. This is a concern because we consider a reasonable, partnership based approach which provides for farming while protecting the indigenous vegetation stock is the most effective and efficient approach.</p> <p>LENZ is a quantitative based approach and as a result does not address</p>	<p>Policy 33.2.3.4 is amended to specify it applies only to the Urban zone.</p>

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
<p>Environments of New Zealand at Level IV) identified as having less than 20% indigenous vegetation remaining; and,</p>		<p>qualitative issues. While we consider it may be considered an appropriate tool for the urban environment we do not consider it adds anything, other than complexity, to assessments of indigenous vegetation in the rural environment.</p>	
<p>Policy 33.2.3.5 Where indigenous vegetation clearance is proposed within an environment identified as having less than 20% indigenous vegetation remaining (defined by the Land Environments of New Zealand at Level IV), have regard to the threatened environment status, the nature and scale of the clearance, potential for</p>	<p>Oppose in part</p>	<p>Federated Farmers considers the primary focus should be on developing indigenous vegetation rules that seeks to identify and protect species based on how threatened or endangered that species is, and/or the intrinsic value of that species.</p> <p>While we appreciate the role Land Environments of New Zealand at Level IV (LENZ) can play in respect to providing an environmental classification system, we note that this is only intended to underpin an overall approach to addressing conservation and resource management issues. We are not comfortable with LENZ being used at the pointy end of regulation as is proposed in this policy.</p> <p>This in effect adds an additional layer to the overall approach to the protection, maintenance or enhancement of indigenous vegetation in the District, and as a result rather than providing clarity to the District's resource users, potentially reduces this clarity. This is a concern because we consider a reasonable, partnership based approach which provides for farming while protecting the indigenous vegetation stock is the most effective and efficient approach.</p> <p>LENZ is a quantitative based approach and as a result does not address qualitative issues. While we consider it may be considered an appropriate tool for the urban environment we do not consider it adds anything, other than complexity, to assessments of indigenous vegetation in the rural environment.</p>	<p>Policy 33.2.3.4 is amended to specify it applies only to the Urban zone.</p>

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
recovery or the merit of any indigenous biodiversity offsets.			
Policy 33.2.3.7 Have regard to any areas in the vicinity of the indigenous vegetation proposed to be cleared, that constitute the same habitat or species which are protected by covenants or other formal protection mechanisms.	Support	Federated Farmers considers it is appropriate for Council to consider the nearby presence of the same habitat or species which are protected by covenants or other formal protection mechanisms, when considering a proposal to clear indigenous vegetation.	Policy 33.2.3.7 is adopted as proposed.
33.3.3 Application of the indigenous vegetation rules	Support	Federated Farmers supports the information provided within 33.3.3.1 to 33.3.3.6 and the subsequent clarity this provides to the assessment of indigenous vegetation coverage.	33.3.3 Application of the indigenous vegetation rules is adopted as proposed.
33.3.4.2 Indigenous vegetation clearance for the operation and maintenance of existing and in	Support	Federated Farmers considers it is appropriate to specifically provide for these activities, that they are likely to have no or negligible impact on indigenous vegetation coverage, and that the matters for exclusion are appropriate.	33.3.4.2is adopted as proposed.

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service/operational roads, tracks, drains, utilities, structures and/or fence lines, but excludes their expansion.			
33.4.1 The clearance of indigenous vegetation complying with all the standards in Table 2 shall be a permitted activity.	Support	Federated Farmers supports the proposal that clearance of indigenous vegetation that is compliant with standards should be a permitted activity.	33.4.1 is adopted as proposed.
33.4.2 Activities located within Significant Natural Areas that comply with all the standards in Table 3 shall be a permitted activity.	Support	Federated Farmers supports the proposal that clearance of indigenous vegetation in an SNA that is compliant with standards should be a permitted activity.	33.4.2 is adopted as proposed.
33.4.3 Activities located within alpine environments (any land at an altitude higher than 1070m	Support	Federated Farmers supports the proposal that clearance of indigenous vegetation within alpine environments that is compliant with standards should be a permitted activity.	33.4.3 is adopted as proposed.

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above sea level) that comply with Table 4 shall be a permitted activity.			
Table 2: Setting out permitted activity standards associated with clearance of indigenous vegetation not located within a Significant Natural Area or within Alpine Environments	Support in part	<p>Federated Farmers generally supports the proposed permitted activity standards for clearance of indigenous vegetation not located within a Significant Natural Area or within Alpine Environments.</p> <p>While we appreciate this will to an extent hinder land use within the District, the proposal to have permitted activity standards is a reasonable one, and the standards set out in this table provide for reasonable, low impact clearance of indigenous vegetation.</p> <p>Clearance of indigenous vegetation which does not meet these standards requires a Discretionary consent. We consider that the requirement to apply for a Discretionary consent for clearance beyond these standards is reasonable, as long as it is dealt with efficiently and effectively, and provides certainty to the consent applicant.</p> <p>Our one concern is in relation to 33.5.3. As addressed in respect to Policy 33.2.3.5, we do not support LENZ being used as a regulatory tool at this level. In terms of rarity, we would instead rely on the use of section 33.7 which identifies threatened species, or otherwise upon the restrictions placed around the area of clearance.</p>	<ol style="list-style-type: none"> 33.5.3. is deleted from Table 2 The remainder of Table 2: Setting out permitted activity standards associated with clearance of indigenous vegetation not located within a Significant Natural Area or within Alpine Environments is adopted as proposed.
Table 3: Activities within Significant Natural Areas identified in Schedule 33.8 and on the District Plan maps	Support in part	<p>Federated Farmers generally supports the proposed permitted activity standards for clearance of indigenous vegetation within Significant Natural Areas.</p> <p>These standards propose that earthworks in a defined SNA area of less than 50m² in any one hectare in any continuous period of 5 years, where this is undertaken on slopes with an angle less than 20°, will be a permitted activity.</p> <p>We note and support that the exemptions outlined at 3.3.4.2 apply in</p>	<ol style="list-style-type: none"> 33.5.9 is amended to specify a degree of scale or size of the proposed area of planting The remainder of table 3: Activities within Significant Natural Areas identified in Schedule 33.8 and on the District Plan maps is adopted as proposed.

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		<p>respect to earthworks (indigenous vegetation clearance for the operation and maintenance of existing and in service/operational roads, tracks, drains, utilities, structures and/or fence lines, but excluding their expansion, is also permitted.</p> <p>The table also proposes that clearance of indigenous vegetation of 50m² or less in an area in any continuous period of 5 years, is a permitted activity.</p> <p>If landowners want to exceed these limits in an SNA, they will be required to apply for a Discretionary consent. We consider that the requirement to apply for a Discretionary consent for clearance beyond these standards is reasonable, as long as it is dealt with efficiently and effectively, and provides certainty to the consent applicant.</p> <p>Our one point of opposition relates to policy 33.5.9, which outlines that any exotic tree or shrub planting will breach the permitted conditions. We consider it is useful to include a degree of significance (for instance, the scale or size of the proposed area of planting) in order to ensure the Table does not unnecessarily capture insignificant planting where there is no or negligible pest plant risk.</p>	
33.9 Threatened Environment Classification Maps	Oppose in part	<p>Federated Farmers considers the primary focus should be on developing indigenous vegetation rules that seeks to identify and protect species based on how threatened or endangered that species is, and/or the intrinsic value of that species.</p> <p>While we appreciate the role Land Environments of New Zealand at Level IV (LENZ) can play in respect to providing an environmental classification system, we note that this is only intended to underpin an overall approach to addressing conservation and resource management issues. We are not comfortable with LENZ being used at the pointy end of regulation as is proposed in this policy.</p> <p>This in effect adds an additional layer to the overall approach to the protection, maintenance or enhancement of indigenous vegetation in the</p>	All areas within the rural zones are removed from 33.9 Threatened Environment Classification Maps, with subsequent changes to the relevant provisions.

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
		<p>District, and as a result rather than providing clarity to the District's resource users, potentially reduces this clarity. This is a concern because we consider a reasonable, partnership based approach which provides for farming while protecting the indigenous vegetation stock is the most effective and efficient approach.</p> <p>LENZ is a quantitative based approach and as a result does not address qualitative issues. While we consider it may be considered an appropriate tool for the urban environment we do not consider it adds anything, other than complexity, to assessments of indigenous vegetation in the rural environment.</p>	

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
CHAPTER 34: WILDING EXOTIC TREES			
34.1 Purpose	Oppose in part	<p>Federated Farmers agrees that it is important to manage exotic vegetation with the potential to spread and naturalise. However, where the risks are appropriately managed the adverse effects of exotic plants can be negligible at best.</p> <p>This is particularly the case in relation to species of pines (wilding pines). These are a useful and often necessary tool in areas of the District, particularly for shelter. However they are also a recognised and particularly costly pest plant for farmers.</p> <p>Subsequently Federated Farmers seeks a balanced approach which allows for the use of wilding pines in isolated and well managed areas, while ensuring the adverse effects of the plant are appropriately managed. This could require a consent for the planting of a grove or stand of wilding pines in the rural area, with the conditions of that consent setting out the</p>	That 34.1 Purpose is re-written to acknowledge that reasonable use of some exotic trees can provide benefit to the District, particularly in the rural context, provided these are appropriately controlled and do not pose a significant pest plant threat.

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		management obligations of the consent holder in relation to the pest plant attributes and risk associated with the planting.	
34.2.1 Objective - Protect the District's landscape, biodiversity and soil resource values from the spread of wilding exotic trees.	Support	<p>Federated Farmers agrees it is important to protect the District's landscape, biodiversity and soil resource values from the spread of wilding exotic trees.</p> <p>Our concern relates to the proposal that this Objective can only be achieved by making the planting of identified wilding tree species a prohibited activity.</p>	Objective 34.2.1 is retained as proposed.
Policy 34.2.1.1 Avoid the further spread of identified wilding tree species by prohibiting the planting of identified species.	Oppose in part	<p>While we agree that it is important to manage exotic vegetation with the potential to spread and naturalise, we disagree that Policy 34.2.1.1, as written, is the best mechanism to achieving Objective 34.2.1, more specifically that avoidance of the spread of identified wilding tree species requires planting these species a prohibited activity.</p> <p>Federated Farmers seeks a balanced approach which allows for the use of wilding pines in isolated and well managed areas, while ensuring the adverse effects of the plant are appropriately managed. This could require a consent for the planting of a grove or stand of wilding pines in the rural area, under a certain area, with the conditions of that consent setting out the management obligations of the consent holder in relation to the pest plant attributes and risk associated with the planting. A consent of this nature may require, for example, setbacks from the boundaries of a property to ensure the pest management risks of the plantings are contained; for example sufficient setbacks to ensure any seedlings are grazed by stock rather than resulting in spread over property boundaries.</p>	<p>Policy 34.2.1.1 is re-considered to assess the viability of developing a new rule along the following lines:</p> <ol style="list-style-type: none"> 1. Permitted activity criteria for plantings under a certain area (a small geographical area), in low risk conditions (with low risk conditions including a setback from property boundaries to ensure seedlings are likely to be grazed, rather than spread over property boundaries), and; 2. The ability to apply for a consent setting out the management obligations of the consent holder in relation to the pest plant attributes and risk associated with the planting, for small to medium sized plantings, again with appropriate setbacks from property boundaries.

Plan/Provision	Support/Oppose	Submissions/Reasons	Decision Sought
CHAPTER 35: TEMPORARY ACTIVITIES AND RELOCATED BUILDINGS			
Policy 35.2.5.1 Permit temporary storage related to farming activity.	Support	Federated Farmers supports the proposal to permit temporary storage, where this is related to farming activity. There are many examples of the need for temporary storage for farming activities where the requirement for storage is either unavoidable or it is unfeasible to take an alternative approach, and these instances are to be expected as part of everyday farming practice in the rural area.	Policy 35.2.5.1 is adopted as proposed.
Policy 35.2.5.2 Ensure temporary storage not required for farming purposes is of short duration and size to protect the visual amenity values of the area in which it is located.	Support	Where temporary storage in the rural area does not relate to farming purposes it is reasonable that this storage is required to be of short duration and small size.	Policy 35.2.5.2 is adopted as proposed.
35.4.4 Relocated Building in a Rural Zone	Support	Federated Farmers supports the proposal for relocation of a building in the Rural Zone to be a permitted activity provided the conditions set out in 35.4.4 are met.	35.4.4 Relocated Building in a Rural Zone is adopted as proposed.