IN THE ENVIRONMENT COURT AT WELLINGTON

I TE KOTI TAIAO O AOTEAROA KI TE WHANGANUI-A-TARA

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of an appeal pursuant to clause 14(1) of Schedule 1 of

the Act in relation to the decision on the Proposed

Wairarapa Combined District Plan

BETWEEN FEDERATED FARMERS OF NEW ZEALAND

INCORPORATED

Appellant

AND CARTERTON DISTRICT COUNCIL, MASTERTON

DISTRICT COUNCIL AND SOUTH WAIRARAPA

DISTRICT COUNCIL

Respondents

NOTICE OF APPEAL



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FORM 7 NOTICE OF APPEAL TO ENVIRONMENT COURT AGAINST THE COUNCILS' DECISION ON THE PROPOSED WAIRARAPA COMBINED DISTRICT PLAN

Clause 14(1) of Schedule 1, Resource Management Act 1991

To: The Registrar

Environment Court

WELLINGTON

- 1. Federated Farmers of New Zealand Incorporated (**Federated Farmers**) appeals against the decision of the Carterton District Council, Masterton District Council and South Wairarapa District Council (the **Councils**) on the Proposed Wairarapa Combined District Plan (the **Proposed Plan**).
- 2. Federated Farmers is a primary sector organisation that represents the interests of farmers and rural communities.
- 3. Federated Farmers made a submission on the Proposed Wairarapa Combined District Plan dated 19 December 2023 (submitter number S214).
- 4. Federated Farmers is not a trade competitor for the purpose of section 308D of the Resource Management Act 1991 (**RMA**).
- 5. Federated Farmers received notice of the Councils' decision on the Proposed Plan on 8 October 2025.

The decision (or parts of the decision) that Federated Farmers is appealing:

6. The specific provisions of the Proposed Plan that Federated Farmers are appealing are set out in the table attached as Appendix 1 to this appeal notice. The general reasons for the appeal are set out below.

The reasons for the appeal are as follows:

- 7. The general reasons for the appeal are that the decisions version of the Proposed Plan (**decisions version**):
 - (a) does not promote sustainable management of natural and physical resources as required by section 5 of the RMA, because certain provisions do not manage the use, development and protection of natural and physical resources in a way which enable people and communities

- to provide for their social, economic, and cultural well-being and for their health and safety;
- (b) will potentially impose undue costs and consent requirements;
- (c) is contrary to best resource management practice;
- (d) does not represent the most appropriate means of exercising the Councils' statutory functions, having regard to the efficiency and effectiveness of other options under section 32 of the RMA;
- does not achieve integrated management of the effects of the use, and development of land, in accordance with section 31 of the RMA;
- (f) does not appropriately give effect to the Greater Wellington Regional Policy Statement (**RPS**); and
- (g) is inconsistent with the Natural Resources Plan for the Wellington Region(Regional Plan).
- 8. Without limiting the generality of the above, further specific grounds of appeal are set out in Appendix 1.

Federated Farmers seeks the following relief:

- 9. The relief sought is set out with respect to each provision in the table attached as Appendix 1. Where specific wording changes are sought as relief, Federated Farmers, in the alternative, seeks any wording that would adequately address the reasons for its appeal.
- 10. Federated Farmers also seek such consequential amendments or related relief as may be necessary to give effect to the concerns described in this notice of appeal, including consequential changes needed to policies or other provisions as a result of rules being amended.

ATTACHMENTS

- 11. The following documents are attached to this Notice:
 - (a) Appendix 1: table of relief sought by provision with reasons provided.
 - (b) Appendix 2: a copy of Federated Farmers' submissions.
 - (c) Appendix 3: the decisions version of the Proposed Plan.
 - (d) Appendix 4: a list of the names and contact details of persons who made submissions and further submissions on the Proposed Plan, to be served

with a copy of this notice within five working days.

Dated 21 November 2025

Signature of person authorised to sign on behalf of the appellant:

Meg Buddle

Mbrdde

On behalf of Federated Farmers of New Zealand Incorporated

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Advice to recipients of copy of notice of appeal

How to become a party to proceedings

You may be a party to the proceedings if you made a submission or a further submission on the matter of this appeal.

To become a party to the appeal, you must:

- Within 15 working days after the period for lodging a notice of appeal ends, lodge
 a notice of your wish to be a party to the proceedings (in form 33), with the
 Environment Court and serve copies of your notice on the relevant local authority
 and the appellant; and
- Within 20 working days after the period for lodging a notice of appeal ends, serve copies of your notice on all other parties.

Your right to be a party to the proceedings in the Court may be limited by the trade competition provisions in section 274(1) and Part 11A of the Resource Management Act 1991.

You may apply to the Environment Court under section 281 of the Resource Management Act 1991 for a waiver of the above timing or service requirements (see form 38).

How to obtain copies of documents relating to appeal

The copy of this notice served on you does not attach a copy of the appellant's submission and the decision appealed. These documents may be obtained, on request, from the appellant.

Advice

If you have any questions about this notice, contact the Environment Court in Auckland, Wellington or Christchurch.

Appendix 1: Table of relief sought by provision with reasons provided

In addition to the relief sought in the right-hand column below:

- Federated Farmers, in the alternative, seeks any wording that would adequately address the reasons for its appeal.
- Federated Farmers also seek such consequential amendments or related relief as may be necessary to give effect to the concerns described in this notice of appeal, including consequential changes needed to policies or other provisions as a result of rules being amended.
- The tracked changes in the Relief Sought by Federated Farmers column are against the decisions version.

Proposed District Plan provision	Reasons for Appeal	Relief Sought by Federated Farmers
Part 1 – Introduction and Ge	eneral Provisions – Interpretation	
Definitions – New Definition: Ancillary rural earthworks	Activities ancillary to primary production, which support primary production and are 'day-to-day' farming activities, should not have to apply for resource consent. Under the general definition of 'earthworks' some day-to-day farm earthworks may trigger onerous and unnecessary requirements for resource consent for example in rules located in the CE, NFL, NATC, NH, SASM chapters. Federated Farmers seeks a new definition for these types of activities in order to facilitate their recognition in the plan's rule framework. Effects on natural environmental values, including freshwater values, are managed by regional plans, and do not need additional regulation by the Proposed Plan.	Add a new definition for 'Ancillary rural earthworks' that reads: **Ancillary rural earthworks means:* **any earthworks or disturbance of soil associated with cultivation, land preparation (including the establishment of sediment and erosion control measures), for planting and growing operations of crops and pasture; **the harvesting of agricultural and horticultural crops (farming); and* **removing trees and horticultural root ripping;* **the maintenance and construction of facilities typically associated with farming activities. This includes (but is not limited to): farm tracks, roads, vehicle manoeuvring areas and landings, stock marshalling yards, stock races, silage pits, offal pits, farm effluent ponds, feeding pads, digging post holes, fencing and sediment control measures, drilling bores, the installation and maintenance of services such as water pipes and troughs, off-stream farm water storage dams, hard stand areas for stock, fertiliser storage pads, airstrips and helipads.
Definitions – Potentially	Buildings associated with primary production that are non- habitable, and which do not pose a 'potential' level of risk to	Amend the definition for 'Potentially hazard sensitive activities' by removing the words 'Buildings associated with

Proposed District Plan	Reasons for Appeal	Relief Sought by Federated Farmers
provision		
hazard sensitive activity	people and communities should be allowed to exist within natural hazard areas, as these often have a functional or operational need to be in a certain location. If such buildings are captured within the definition of 'potentially hazard sensitive activities', these buildings may require a resource consent. However, there is little risk of harm to these buildings from natural hazards, and therefore delays and costs experienced by farmers for such consent processes would be incommensurate with the minor environmental benefit.	primary production'.
	This additional layer of 'potentially hazard sensitive activities' and the associated definition for these does not align with the Regional Policy Statement for the Wellington Region 2013 (RPS), which only covers 'hazard sensitive activities'. The RPS definition for 'hazard sensitive activity' has an exhaustive list of 12 activities. Buildings associated with primary production is not one of these 12.	
Definitions – Special amenity landscapes	If Federated Farmers' below relief regarding deletion of NFL- O2 and NFL-P2 is accepted, delete this definition as a consequential change.	Delete the 'Special amenity landscapes' definition.
Definitions – Surface Waterbody	This definition is unnecessary alongside existing definitions in RMA (defines water body) and the Natural Resources Plan for the Wellington Region (Regional Plan) (defines surface water body) that already define similar terms. This additional definition creates unnecessary complexity and potentially unforeseen consequences in implementing the Proposed Plan, which may result in having to obtain resource consent (and associated delays and costs) for little or no environmental benefit.	Delete the 'Surface Waterbody' definition in its entirety.
Part 2 – District Wide Matter	s – Strategic Direction	
Strategic Direction Objective RE-O4 Character and amenity values of the rural environment	The addition of "amenity values" in the decisions version may have perverse consequences for rural primary production activities from a <i>reverse sensitivity</i> perspective. Amenity values are defined in the RMA and the National Planning Standards to mean: "those natural or physical qualities and	Amend RE-O4 by deleting the words "and amenity values".

Proposed District Plan provision	Reasons for Appeal	Relief Sought by Federated Farmers
	characteristics of an area that contribute to people's appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes."	
	It is possible that the requirement in RMA section 7(c) (to have particular regard to maintenance and enhancement of amenity values) could be applied in favour of existing rural lifestyle development in the General Rural Zone in a way that would trump ability of primary producers to function. This would be unfortunate for such primary producers, as the General Rural Zone is where primary production is intended to predominate and the application of RMA s7(c) could trigger an adverse effect on efficient use of the rural land resource.	
Part 2 – District Wide Matter	s – Energy, Infrastructure and Transport – NU-Network Utiliti	es
Objective NU-O3 Adverse effects on network utilities	Existing network utilities (within Network Utility Corridors) and Designated Network Utility Land should be protected only within Network Utility Corridors. While the NES for Electricity Transmission requires existing access to transmission corridors to be protected, extending the protection of network utilities further beyond the established Network Utility Corridors is unnecessary and provides no certainty for private landowners as to what they can do on their own land.	Amend Objective NU-O3 to read: The safe function and operation of network utilities is protected from the adverse effects, including reverse sensitivity effects of incompatible subdivision use and development within existing network utility corridors or within designated network utility land.
	If network utility operators wish to negotiate additional 'protection' outside the Network Utility Corridors and Designated Network Utility land, then they are free to negotiate this with private landowners.	
Objective NU-O4 National Grid	The National Grid should be protected only within the National Grid Corridor. While the NES for Electricity Transmission requires existing access to transmission corridors to be protected, extending the protection of network utilities further beyond these established areas is unnecessary and provides no certainty for private landowners as to what they can do on their own land. If network utility operators wish to negotiate additional 'protection' outside National Grid Corridors, then	Amend NU-O4 to read: Subdivision, use and development within the national grid corridor is managed to avoid reverse sensitivity effects on the National Grid and ensure that the operation, maintenance, repair, upgrading and development of the National Grid is not compromised.

 $^{^{3}}$ RMA section 2 and National Planning Standards 2019, Definitions List at page 54.

Proposed District Plan provision	Reasons for Appeal	Relief Sought by Federated Farmers
	they are free to negotiate access arrangements with private landowners	
Policy NU-P7 Activities near the National Grid	As per above, protection for the National Grid should not extend beyond the National Grid Corridor and existing access thereto. Please note that Federated Farmers submitted on Policy NU-P6, which has been renumbered as Policy NU-P7 in the decisions version of the Proposed Plan.	Amend NU-P7 to read: NU-P7 Activities near within the National Grid Manage subdivision, use and development near within the National Grid Corridor to: a. avoid the establishment or expansion of sensitive activities; b. Ensure that the safe and efficient operation, maintenance, repair, upgrading, removal, and development of the National Grid is not compromised; and c. Ensure that reverse sensitivity effects on the National Grid are avoided.
Rules NU-R3 to R6; NU-R9 to NU-R17.	Federated Farmers supports the intent of the rules for network utilities but queries why there is no consideration required of the potential adverse effects that network utilities (including their establishment, operation and upgrading) can have on existing lawfully established activities in the rural environment. The Council appears to have focused primarily on reverse sensitivity impacts related to network utilities, potentially to the detriment of other duly established activities.	Add a new matter of discretion for restricted discretionary rules NU-R3 to R6 and NU-R9 to R17 that reads: The potential adverse effects on the operation of existing farming and rural activities located in the general rural and rural lifestyle zones.
	If network utilities require consent, the effects of the activity on surrounding land and land uses should be a relevant matter. The Council's s42A reporting planner recommended inserting restricted discretionary / discretionary activity criteria that would have satisfied Federated Farmers' original submission point. However, this recommendation was not adopted in the Council's decision and may have been overlooked. Rules NU-R16 and R17 have been renumbered in the	
	decisions version and were notified as Rules NU- R17 and NU-R18. Federated Farmers originally submitted on R17 and	

Proposed District Plan provision	Reasons for Appeal	Relief Sought by Federated Farmers
	R18.	
Part 2 – District Wide Matter	s – Hazards and Risks – NH- Natural Hazards	
Objective NH-O2 Natural measures	The implementation of this objective is not clear. It could lead to unpredictable and onerous restrictions on the private use of land. 'Natural defences' and 'nature-based solutions' are not necessarily practical for mitigating natural hazard risks on existing development in all situations, and any objective aimed at requiring adoption of these methods is likely to be unachievable in such situations. Further, it is unreasonable to restrict use of private property merely because 'natural defences' or 'nature-based solutions' might benefit hazard risk mitigation/avoidance. Making these measures mandatory, as opposed to optional and only for appropriate situations: • creates uncertainty as to the scope of such restrictions; and • could hamper the practical management, adaptation	Delete NH-O2 in its entirety.
Policy NH-P10 Natural hazard mitigation works	Federated Farmers seeks to ensure that mitigation works involving private land within natural hazard areas that are undertaken by a statutory agency, or their nominated contractors or agents, are undertaken in a manner that is compliant with section 181 of the Local Government Act 2002. Clause 2 of this policy has been added in the decisions version. Federated Farmers opposes this addition,	Federated Farmers seeks the amendment of Policy NH-P10 so that it reads: Enable natural hazard mitigation or stream and river management works provided: 1. Works are undertaken by a public authority or their nominated contractors or agents within hazard areas where these will significantly decrease the existing risk to people's safety and wellbeing, property, and infrastructure and comply with requirements in the Local Government Act 2002 in relation to construction of works on private land; or 1A. Works are undertaken by the landowner or their agent are minor, and comply with the Regional Plan. 2. The use of soft-engineering or nature-based

Proposed District Plan	Reasons for Appeal	Relief Sought by Federated Farmers
provision		
		solutions is considered where appropriate.
Rule NH-R1 Flood mitigation or stream or river management works undertaken by a public authority or their nominated agent within any of the flood hazard areas	Federated Farmers supports the purpose of this rule however objects to the requirement that flood mitigation or stream, or river management works are only permitted when done by or on behalf of a statutory agency or their nominated agent. There are often extenuating circumstances such as extreme weather events that see members of the community such as farmers having to undertake flood mitigation (e.g. drainage works) into their own hands without permission from Council. This rule should be amended to better align with the Regional	Firstly, amend NH-R1 so that flood mitigation or stream or river management works ahead of extreme weather events is provided for as a permitted activity for landowners. Secondly, further amend NH-R1 to permit minor works to be undertaken by the relevant landowner that complies with the relevant rules in the Regional Plan.
	Plan. The Regional Plan has numerous permitted activity rules under which private landowners could do minor flood mitigation or waterway management works.	
	Councils should avoid unnecessary duplication between regional and district plans, and district plans must not be inconsistent with a regional plan, on any matter that relates to a regional council's RMA functions under s 75(4) of the RMA.	
Rule NH-R3 Any potentially hazard sensitive activity and associated buildings within Moderate Hazard Areas and Low Hazard Areas	This rule will cover farm buildings if the definition for 'Potentially hazard sensitive activity', which currently includes 'buildings associated with primary production' is not amended. Federated Farmers considers that farm buildings, such as barns and implement sheds, that are non-habitable should be removed from the definition of 'Potentially hazard sensitive activities'. Such buildings are typically constructed with framing poles rammed into the ground and have bare earth foundations and therefore are not as prone to natural hazards. Many of these farm buildings will be larger than the 10m² floor area cap, which may have been set with urban buildings in mind.	If relief for definition of 'Potentially hazard sensitive activity' is not accepted, amend NH-R3 to exclude: <u>buildings associated with primary production especially those made with rammed pole or bare earth construction methods.</u>
	These farm buildings are likely to be situated within existing clusters of other farms buildings to allow practical management of day-to-day farm operations, and it adds unnecessary difficulty if replacement buildings have to be situated any considerable distance away. Therefore, classifying such farm buildings as 'potentially hazard	

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	sensitive' creates significant costs to farming operations, which are likely to outweigh any benefits.	
Part 2 – District Wide Matter	s – Historical and Cultural Values – SASM – Sites and Areas	of Significance to Māori
Objective SASM-O1 Recognising sites and areas of significance to Māori	The term 'Recognition' of sites and areas of significance to Māori (SASM) in this objective may result in new SASM areas being recognised outside of a district plan change or plan review Schedule 1 process. The Introduction to the SASM chapter seems to suggest the same approach where it says4: However, the Councils acknowledge that there are a great number of sites that have not been identified. Further research, evaluation and engagement between Council and tangata whenua is necessary to accurately identify, understand, document and map this resource. And:5 It is important to note that there may be other sites known only to Rangitāne o Wairarapa and Ngāti Kahungūnu ki Wairarapa that are not identified in the District Plan Therefore, effective engagement with tangata whenua is necessary to ensure the ongoing protection and security of sites of significance that are not listed in the District Plan. The Proposed Plan should provide certainty to landowners over what can and cannot be done on their land. New mapping layers should only be introduced via the Schedule 1 process that allows the landowner and the community to participate. Any SASMs should be identified by the Proposed Plan and mapped on the Proposed Plan planning maps.	Firstly, amend SASM-O1 so that it reads: Sites and areas of significance to Māori are recognised identified, protected and maintained; Secondly, make consequential changes to the SASM Chapter Introduction to clarify that new SASMs will only be introduced via a Schedule 1 process.

⁴ SASM Chapter Introduction, page 1 at paragraph 6. ⁵ SASM Chapter Introduction, page 2 at paragraph 1.

Proposed District Plan provision	Reasons for Appeal	Relief Sought by Federated Farmers
Objective SASM-O2 Providing for kaitiakitanga	It is unclear what tangata whenua exercising kaitiakitanga over SASMs will involve. Will it be limited to tangata whenua involvement in the Councils' functions? Or is it intended that tangata whenua will access the relevant land independently of the Councils? Private landowners are liable for certain activities done on their land by other parties, for instance because of health and safety legislation or biosecurity legislation. This objective should acknowledge that tangata whenua need landowner permission before accessing private land.	Amend SASM-O2 to read: Tangata whenua can exercise kaitiakitanga in relation to sites and areas of significance to them in the Wairarapa. Where such sites and areas have been identified on private land, engagement with the relevant landowner should be encouraged to ensure access to the sites and areas is able to occur.
Policy SASM-P2 Protect and maintain sites and areas of significance to Māori	The SASMs listed in Schedule 4 and mapped in the Proposed Plan Map Viewer are shown as either a point, small polygon or large polygon. The Introduction to the SASM Chapter says that "[i]f the site has a discrete spatial extent, it is identified and mapped as a point. If the site or area has a larger spatial extent, the site is identified and mapped as a polygon." The Map Viewer shows 65 point-mapped SASMs.	Amend SASM-P2(b) by deleting the words "in proximity to": (b) Rrequiring activities on, or in proximity to sites and areas of significance to Māori to maintain the site or area's cultural, spiritual, and historical values, interests, or associations of importance to tangata whenua; and
	Some of the point-mapped sites may not be readily visible onsite, and/or their extent may not be readily discernible. For example, the Map Viewer short descriptions of some of the point-mapped sites read: • Pa site. Ploughed - no features visible. Scattered hangi stones noted in 1971 (TWs9) • Kainga. Various house sites, orchards and a urupa. (TWs13) • Originally recorded as a ditch, stone rows and midden, of Maori origin. Identified in 2006 as a ditch, of European origin (TWs24) • Kainga. Extent of site at least 200 x 50 m along sand dune. School site - native school closed no later than 1900. Ngati Porou urupa. Old Whare Tupuna site	

⁶ SASM Chapter Introduction, page 2 at paragraph 2.

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	(TWs26) • Findspot for canoe artefact (TWs19)	
	The SASM Chapter Introduction acknowledges that some sites are no longer visible when it says: "In some cases, the original features of a site may have been lost or damaged Even where these sites no longer exist physically, they still hold cultural significance to Rangitāne o Wairarapa and Ngāti Kahungūnu ki Wairarapa."	
	The Proposed Plan Map Viewer also uses a disclaimer, that would apply to point-mapped (as well as polygon-mapped) SASMs. The disclaimer says: ⁸	
	Masterton, Carterton and South Wairarapa District Councils have made every reasonable effort to provide complete and accurate information in the map viewer. While the Councils try to make sure that the information in this map viewer is accurate and up to date, there may be errors and omissions. The Councils do not guarantee:	
	That the information extracted when conducting a property search comprises all relevant information for the property (the Councils recommend users read the Proposed District Plan or talk to a Council planner);	
	That the planning map information gives the exact location of features when viewed on the ground.	
	The Council accepts no responsibility or liability for the public's subsequent use or misuse of any of the information in the map viewer.	
	These aspects of the Proposed Plan and mapping demonstrate the potential uncertainty associated with mapped SASMs.	
	The phrase "in proximity to" in this policy adds uncertainty,	

 ⁷ SASM Chapter Introduction, page 2 at paragraph 3.
 ⁸ Wairarapa Combined District Plan Map Viewer – Decisions Version, Map Viewer Disclaimer
 https://experience.arcgis.com/experience/f28f02dcce1c41c694eea0427878f9b3 accessed on 18 November 2025.

Proposed District Plan provision	Reasons for Appeal	Relief Sought by Federated Farmers
	when applied to both point-mapped and polygon-mapped SASMs. This uncertainty is especially so combined with the uncertainty, demonstrated above, of location and extent of the mapped SASMs. What does "in proximity to" mean? Will it be within 5 metres for one SASM, and within 50 metres for another SASM? How will landowners and resource users be able to determine if a proposed activity sufficiently close to a SASM to trigger this policy? Will landowners and resource users need to engage with tangata whenua to understand if their activity is "in proximity to" a SASM?	
	The SASM rules do not clarify or help with establishing what "in proximity to" means generally, and whether it will change depending on particular circumstances.	
	Federated Farmers does not oppose scheduling and protecting SASMs, but seeks sufficient certainty for landowners to make decisions about their property and apply the Proposed Plan provisions on protecting SASMs. Therefore, the mapped location and extent of SASMs needs to, as far as practicable, be clear and certain.	
Policy SASM-P3 Allow limited earthworks within sites and areas of significance to Māori	For the same reasons as above against SASM-P2, the phrase 'in proximity to' creates uncertainty.	Amend SASM-P3 by deleting the words "in proximity to: Allow for: a. Small-scale earthworks for burials within existing urupa; and b. Other earthworks on, or in proximity to sites and
		areas of significance to Māori only where it can be demonstrated that the identified values will be protected, having regard to
Policy SASM-P4 Allow limited activities within sites and areas of significance to Māori	For the same reasons as above against SASM-P2, the phrase 'in proximity to' creates uncertainty.	Amend SASM-P4 by deleting the words "in proximity to: Allow the following activities to occur on, or in proximity to sites and areas of significance to Māori, while ensuring their design, scale, and intensity will not compromise cultural, spiritual, and historical values,

Proposed District Plan provision	Reasons for Appeal	Relief Sought by Federated Farmers
		interests, or associations of importance to tangata whenua:
Policy SASM-P5 Protect the values of sites and areas of significance to Māori from inappropriate subdivision, use, and development	For the same reasons as above against SASM-P2, the phrase 'in proximity to' creates uncertainty.	Amend SASM-P5 by deleting the words "in proximity to: Only allow any other use and development on, or in proximity to sites and areas of significance to Māori where it can be demonstrated that the cultural, spiritual, and historical values, interests, or associations of importance to tangata whenua of the site or area are protected and maintained, having regard to:
Policy SASM-P6 Manage removal or destruction of sites and areas of significance to Māori	As currently worded, this policy is confusing and could be interpreted as capturing offsite activities that may have an effect on the SASM.	Amend the chapeau of SASM-P6 to read: Ensure the adverse effects of activities on within sites and areas of significance to Māori are managed by:
Part 2 – District Wide Matter	s – Natural Environment Values – ECO – Ecosystems and Inc	digenous Biodiversity
Objective ECO-O1 Indigenous biodiversity	Federated Farmers considers that this objective should not dictate the way that the overall goal of at least 'no overall loss in indigenous biodiversity' will be achieved. Objectives should state "what" — the overall goal is that is to be achieved. The "how"— the way that the overall goal is achieved — should be left to the lower order provisions. In some situations, 'maintaining' indigenous biodiversity may be sufficient, and in other situations indigenous biodiversity may need to be enhanced or restored.	Amend ECO-O1 so that it reads: Indigenous biodiversity within the Wairarapa is maintained, and enhanced, or restored where degraded so there is at least no overall loss in indigenous biodiversity.
Policy ECO-P3 Identify areas of significant indigenous vegetation and significant or habitats of indigenous fauna	This policy triggers a requirement for resource consent applicants to do an identification exercise for habitats comprising significant indigenous vegetation and significant habitats of indigenous fauna. However, the RPS directs that such identification should happen at the plan development stage, not during resource consent applications. If done on a case-by-case basis through the resource consents process, there is potential for 'gappy' or 'patchy' identification and analysis of habitats. Some activities on	Amend Policy ECO-P3 to read: Identify with tangata whenua and landowners those areas that are habitats comprising significant indigenous vegetation and significant habitats of indigenous fauna in the Wairarapa, including through resource consent processes using the significance criteria in the Wellington Regional Policy Statement.

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	adjacent properties may not need consent so the identification work will not need to be done.	
	Ad-hoc identification and analysis risks poor or ineffective outcomes for indigenous biodiversity protection/ enhancement. It also may present an unduly onerous burden for some individuals who happen to be consent holders or applicants. Cumulative adverse effects on indigenous biodiversity will be beyond the control of individual consent holders to manage via case-by-case identification of indigenous biodiversity habitats.	
	It is not clear how the obligation on other individuals (who are not consent applicants or consent holders) will be implemented through ECO-P3.	
Policy ECO-P4 Protect areas of significant indigenous vegetation and significant or habitats of indigenous fauna	The phrase "directly adjacent to" in clause (c) is uncertain and has not been written in a way that is specific, measurable, or achievable.	Amend ECO-P4(c) to read: c. requiring activities within or directly adjacent to these areas to manage their adverse effects in accordance with ECO-P6 and ECO-P13; and
Policy ECO-P5 Appropriate activities for areas of significant indigenous vegetation and significant or habitats of indigenous fauna	This policy allows for a number of minor activities such as: d. maintenance of existing access tracks, fencelines, and firebreaks and the construction of new fencelines and firebreaks. A range of additional farm activities and structures should be included within the activities listed in this policy, because they are similarly routine and minor and would have little or no effect on indigenous biodiversity. For example, this policy could capture many day-to-day farming activities associated with pasture maintenance, such as: • pest plant control, • hay-making, • sowing/harvesting livestock fodder crops, and • periodic clearance of other vegetation species that may end up spreading onto pastureland. In some cases, existing farm access tracks and farm water	Federated Farmers seeks the amendment of Policy ECO-P5(e) to read as follows: Enable the following activities relating to habitats comprising significant indigenous vegetation and significant habitats of indigenous fauna in the Wairarapa where adverse effects are avoided where practicable or minimised: e. maintenance of existing farm buildings, farm access tracks, farm drains, culverts, gates and fence lines, farm stock water supply dams, pipes and troughs and firebreaks and the construction of new fence lines, farm water supply pipelines, farm tracks and firebreaks;

Proposed District Plan provision	Reasons for Appeal	Relief Sought by Federated Farmers
	supply pipelines in particular, may need to be relocated to achieve better environmental outcomes. Any new replacement farm access tracks and pipelines may have to be wholly or partly within areas of significant indigenous vegetation and significant habitats of indigenous fauna (SNAs). Another example is before or after a storm event, farmers may need to access and maintain or repair a culvert that is within an SNA.	
Policy ECO-P8 Management of effects on other indigenous vegetation	This policy on modification of indigenous vegetation outside of SNAs could have perverse consequences for indigenous biodiversity. It may discourage people from voluntarily planting indigenous vegetation (e.g. for shelter belts) and choosing to plant exotic vegetation instead. It may also discourage landowners from allowing or aiding indigenous biodiversity to regenerate on their land. This could have a counterproductive impact on indigenous biodiversity. This policy, and the ECO chapter in general, does not align with the National Policy Statement for Indigenous Biodiversity (NPS-IB), which says that councils must allow maintenance of improved pasture, subject to specific conditions (set out in clause 3.17 of the NPS-IB). Currently the ECO chapter provisions in the Proposed Plan do not provide for this.	Delete Policy ECO-P8 in its entirety. Alternatively, if this relief is not accepted then it is sought that the policy is amended to read: Manage the modification of indigenous vegetation outside of habitats comprising significant indigenous vegetation or significant habitats of indigenous fauna to ensure any adverse effects on the indigenous biodiversity are avoided, remedied, or mitigated, considering: e. regarding primary production activities: i. the functional or operational need for primary production to occur on rural land; ii. the need to avoid perverse consequences that could arise from discouraging landowners either planting indigenous biodiversity, or supporting regeneration of indigenous biodiversity on their property; iii. the need to allow maintenance of improved pasture; e. fto require adverse effects of activities other than renewable electricity generation activities, or any primary production activities related to clause (e), on biological diversity of indigenous species and habitats

Proposed District Plan provision	Reasons for Appeal	Relief Sought by Federated Farmers	
provident.			
		to be managed as follows:"	
Rule ECO-R1 Modification of indigenous vegetation within a Significant Natural Area	Federated Farmers supports the permitted activity status in ECO-R1 for the modification of indigenous vegetation within an SNA. In particular, Federated Farmers supports paragraphs (1)(a)(v) and (vi) that permit the removal or trimming of vegetation branches as necessary to prevent interference with lawfully established structures, buildings, and fence lines.	Amend ECO-R1 to add: vi. required to remove or trim branches of vegetation to the extent necessary to avoid them interfering with lawfully established pasture, drains, farm tracks, structures, buildings, fencelines, network utilities, existing roads or access tracks;	
	However, Federated Farmers seeks that the rule be expanded to encompass other lawfully established activities essential to the daily operations and maintenance of a farm, such as maintenance of pasture, drains and farm tracks. This inclusive approach ensures that the rule adequately addresses the practical needs of farmers while balancing the need to protect SNAs.		
	Within the Proposed Plan's General Rural Zones, there are 192 medium or large property titles (above 5 ha in area) that intersect with an SNA. Therefore, this rule and other rules on SNAs will affect many farms and other rural properties.		
Part 2 – District Wide Matter	s – NFL – Natural Features and Landscapes		
Objective NFL-O2	There are seven Special Amenity Landscapes (SALs) listed in Schedule 8 and mapped in the Proposed Plan Map Viewer. The largest of these (SAL1) covers almost the entire Wairarapa coastline. The aim for SALs is set out in Objective NFL-O2 and two NFL policies (NFL-P2 and NFL-P5), and mentioned in Policy NU-P6 about adverse effects of the National Grid. However, there are no specific rules on SALs in the Proposed Plan. This is acknowledged in the NFL	Federated Farmers' seeks, as a first order of relief, deletion of any SALs that serve no regulatory purpose. This may entail deleting all references to Special Amenity Landscapes in the Proposed Plan, such as: The definition of 'special amenity landscapes' Policies NFL-P2 and NFL-P5 References to 'special amenity landscapes' in the	
	Introduction ⁹ . Federated Farmer's original submission sought that this	NFL Chapter Introduction The mention of 'special amenity landscapes' from Policy NU-P6	

⁹ NFL Chapter Introduction, page 1 at paragraph 5.

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provision			
-	Objective and other provisions on SALs be deleted. Federated Farmers maintains that SALs should be removed from the Proposed Plan, because: a. it is uncertain how current manifestation of SALs provisions (i.e. objectives, policies and scheduled SALs but no rules) would be implemented. Will the SAL provisions be applied in discretionary or noncomplying consent processes if the activity is within a SAL? b. Specially for the coast, SAL1 for the Wairarapa coastline overlaps significantly with the coastal environment layer. Because of the overlap, the	Schedule 8. Alternatively, if the relief sought above is not accepted, Federated Farmers would accept a second order of relief of amending Schedule 8 by deleting SAL1 Wairarapa Coastline where this is also within a Coastal Environment overlay area. Alternatively, if either relief sought above is not accepted, Federated Farmers seeks, as a third order of relief, that NFL-O2 be amended to read:	
	coastal provisions will apply to much of the land within SAL1. The coastal provisions seek to protect and maintain many of the same values that are relevant landscape values for SAL1. Therefore, Federated Farmers questions whether it is necessary to identify the area within SAL1 as a Special Amenity Landscape.	Special Amenity Landscapes within the Wairarapa are maintained and where practicable enhanced, while allowing productive activities within these rural environments and redevelopment in urban environments to continue. And that consequential amendments be made to the SAL policies NFL-P2 and NFL-P5 and the NFL Chapter Introduction, to clarify that the presence of a SAL will not	
	Where there is a choice, regulatory frameworks should err on the side of a 'less restrictive regime' where the purposes of the RMA and the objectives of the plan can be met.	inhibit primary production activities in the General Rural Zone.	
	If removing SALs altogether from the Proposed Plan is not accepted, Federated Farmers considers that this Objective, and consequentially the SAL policies NFL-P2 and NFL-P5 and the NFL Chapter Introduction, should be amended to clarify that the presence of a SAL will not inhibit primary production activities in the General Rural Zone.		
Part 2 – District Wide Matters – NFL – Natural	Federated Farmers considers that this policy should be removed from the Proposed Plan, for the reasons above	Delete NFL-P2.	

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Features and Landscapes – Policy – NFL-P2	against NFL-O2.	Alternatively, if the relief sought above is not accepted, amend NFL-P2 to read: **NFL-P2 Identify Special Amenity Landscapes while recognising existing land use patterns** Identify Special Amenity Landscapes that are distinctive, widely recognised, and highly valued by the community for their contribution to the amenity and quality of the environment of the Wairarapa, based on the following criteria: a. Natural science factors; b. Sensory factors; and c. Shared or recognised features. During identification and scheduling of Special Amenity
Policy NFL-P3 Subdivision, use, and development within an Outstanding Natural Features and Landscapes outside the Coastal Environment	This Policy does not explicitly provide for primary production activities, which tend to fall within Outstanding Natural Feature and Landscape boundaries.	Landscapes, recognise existing land use patterns. Amend NFL-P3(b) by adding a new sub-clause as follows: viii. enabling primary production activities to operate efficiently and to make effective use of the land resource of the rural zones.
Policy NFL-P4 Subdivision, use, and development within Outstanding Natural Features and Landscapes within the Coastal Environment	This Policy does not explicitly provide for primary production activities, which tend to fall within Outstanding Natural Feature and Landscape boundaries.	Firstly, amend NFL-P4(b) by inserting after sub-clause (ii): iii. enabling primary production activities to operate efficiently and to make effective use of the land resource of the rural zones; and Secondly, consequential renumbering of existing sub-clauses iii. and iv.
Standard NFL-S1 Earthworks	The thresholds for earthworks in this standard are inappropriate and will capture many day-to-day primary production activities within resource consent processes that will incur delays and costs for little or no environmental	Amend NFL-S1 by adding an exclusion to allow 'ancillary rural earthworks' as per Federated Farmers' appeal point on the inclusion of a new definition for 'ancillary rural

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	benefit. Day-to-day farming may include earthworks for cultivation, land preparation for planting, offal pits, digging post holes, to name only a few examples. A complete list of day-to-day farming activities is included above in the relief Federated Farmers seeks against a new definition for 'ancillary rural earthworks'. Added together, farm earthworks will often exceed 50m² per site in any one year, but these minor earthworks are likely to have little or no adverse environmental effects in the context of the rural working environment for primary production.	earthworks'.	
Standard NFL-S2 Modification of indigenous vegetation	Farming activities may often involve clearing more than 50m² of indigenous vegetation within any one year, but then may not involve clearing any indigenous vegetation for the next several years. For instance, some tasks involving clearance may be delayed due to the farming calendar and instead be done biennially or triennially to mesh in with various other farm management tasks. Also, trimming shelter belts made from indigenous vegetation would also count towards the 50m² limit. Federated Farmers further seeks that firebreaks are included in the list of exemptions to this standard. In this regard, ECO-P5, which applies to SNAs, includes 'maintenance of firebreaks' as an activity that should be enabled within SNAs, suggesting that maintenance of firebreaks would not be inappropriate in other areas as well as within SNAs.	Amend NFL-S2 to add the following exception: This standard does not apply to modification of indigenous vegetation that is: d. associated with maintenance of: i. pasture, ii. existing farm tracks, iii. water supply pipelines, iv. farm water supply dams, v. farm drains, livestock mustering yards, vi. farm vehicle hard stand areas, vii. airstrips viii. sileage pits, ix. fence lines or x. fire breaks.	
Standard NFL-S3 Buildings and structures	Farm buildings and structures are often larger than 50 m² and taller than 5m and may breach the other standards in NFL-S1. Federated Farmers consider that it would be inappropriate to apply this standard to those buildings/structures. To do so may result in inefficient and unnecessary costs and delays for	Amend NFL-S3 to exclude farm buildings and structures by adding: This standard does not apply to: a. buildings and structures ancillary to rural production activities, such as fences and gates, storage barns.	

Proposed District Plan provision	Reasons for Appeal	farm implement sheds, livestock shelters for mustering areas, dairy sheds, shearing/wool sheds, and herd homes.	
	little or no environmental benefit.		
Part 2 – District Wide Matter	s – Natural Environment Values – PA-Public Access		
Objective PA-O1 Public access and enjoyment	The reference to 'water quality' in clause (a) has been added in the decisions version of the Proposed Plan. Preserving water quality is not a function of district councils under RMA s31, and is not a requirement on district councils under RPS.	Amend PA-O1 by removing the reference to water quality in clause (a).	
Policy PA-P2 Compatible activities	This policy doesn't have a method that relates to anticipating future possible public access areas. The policy also does not recognise that new public access should be compatible with existing activities. Without such acknowledgments, the ability of farmers to utilise land for primary production could be disproportionately adversely impacted compared to adverse effects on public access, depending on the circumstances.	Replace PA-P2 with: <u>Ensure any new public access is compatible with</u> existing lawfully established activities within the coastal environment, rivers, lakes and wetlands and their margins.	
Part 2 – District Wide Matter	s – Subdivision -SUB-Subdivision		
Objective SUB-O2 Servicing	There is no practical way of ensuring rural subdivision 'is capable of connecting to a telecommunication network' other than ensuring every rural property owner has a mobile phone. Many rural areas do not have telephone network coverage and whether or not they do is beyond the control of any subdivision applicant. The absence of a local telephone network is not a reasonable ground for refusing rural subdivision, merely because a landowner may be unable to connect to a telecommunication network. Some rural subdivision may be needed for purposes that don't require connection to a telecommunication network — e.g. lots for cropping, grazing or standing off dairy cattle etc.	Amend SUB-O2(b) by removing the words added in the decisions version, in the following way: b. subdivisions in Rural Zones are capable of being serviced via on-site water, wastewater, and stormwater measures when development occurs on the site and are capable of connecting to a telecommunication network.	

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Policy SUB-P2 Provide integrated infrastructure at subdivision	Federated Farmers opposes the new text in sub-clause (d)(iv) for the same reasons as above against SUB-O2.	iv) Amend SUB-P2 by deleting clause (d)(iv).	
Rule SUB-R5 Subdivision of a surplus residential unit	Federated Farmers considers that the threshold of 40 ha set out in clause (d) is too large and 20ha is more appropriate. A farmer should not be forced to dispose of or subdivide 40ha if they only need to dispose of or subdivide 20ha. The ability to subdivide lots at a 20ha minimum is unlikely to have an adverse effect on protection of highly productive land. Under the current operative district plan the minimum lot size is 4ha. There is evidence that lots between 20 and 40ha have been created since the current district plan became operative in 2011. Federated Farmers submits that such lots were predominantly created for, and are still used for, primary production purposes. Notwithstanding this, the proportion of lots created between 20ha and 40ha during this period only amounts to some 6 percent of the total number of rural lots created during this period. So, allowing lots with a 20ha minimum would be highly unlikely to have any significant adverse effect on protection of highly productive land, yet it would meet a demand for useful rural subdivision. Further, clause (e) is confusing and should be deleted because it is not necessary. Rural subdivision may be for purposes other than facilitating a residential dwelling.	Firstly, amend SUB-R5(d) to read: The balance area remaining from the record of title subject to subdivision is no less than 40ha-20ha Secondly, delete clause (e).	
SUB-Table 1 Minimum allotment sizes	Federated Farmers considers that the controlled subdivision threshold of 40ha is too large and 20ha is more appropriate. In Wairarapa, subdivision for farming lots has previously involved lots sized between 20 and 40ha. This is more appropriate for farmers who wish to buy (or sell) land for cropping or supplemental grazing (or dairy stand-off etc) that is smaller than 40ha — to make management of their farming operation more efficient — rather than being forced into less desirable/reliable lease arrangements if barriers to rural subdivision are too high.	Amend SUB-Table 1 to replace 40ha with 20 ha, in the General Rural Zone.	

Proposed District Plan provision	Reasons for Appeal	Relief Sought by Federated Farmers
Part 2 – District Wide Matters	s – General District Wide Matters – CE-Coastal Environment	
Standard – CE-S1 Earthworks	This standard is too restrictive and not appropriate for the full range of rural production activities. CE-S1 risks capturing routine farm activities in a resource consent process resulting in costs and delays for little or no environmental benefit. Therefore, more exceptions for rural earthworks are warranted.	Amend the exception in CE-S1 to read: This standard does not apply to: a. Earthworks associated with maintaining existing farm tracks, roads, water supply infrastructure, farm water supply dams, farm drains, livestock mustering yards, farm vehicle hard stand areas, airstrips, sileage pits, fence lines and access ways are exempt from the above area standards but must comply with NFLS1(1)(a) and NFL-S1(2)(a).
Standard CE-S2 Modification of indigenous vegetation	This standard is too restrictive and not appropriate for the full range of rural production activities. Day-to-day farming activities often require modification of indigenous vegetation that, in the aggregate, would exceed 50m² per site in any single specific year, but then not involve any vegetation removal for several years following. Federated Farmers considers that such indigenous vegetation removal activities will have little to no adverse environmental effect. If CE-S2 is not amended, many farming-related activities involving modification of indigenous vegetation will require a resource consent, adding undue delays and cost for little or no environmental benefit. Federated Farmers further seeks that firebreaks are included in the list of exemptions to this standard. In this regard, ECO-P5, which applies to SNAs, includes 'maintenance of firebreaks' as an activity that should be enabled within SNAs, suggesting that maintenance of firebreaks would not be inappropriate in other areas as well as within SNAs.	Add a new exception to CE-S2 that reads: This standard does not apply to modification of indigenous vegetation that is: d. associated with maintenance of pasture, existing farm tracks, water supply pipelines, farm water supply dams, farm drains, livestock mustering yards, farm vehicle hard stand areas, airstrips, sileage pits, fence lines or fire breaks.
Standard CE-S3 Buildings and structures	Federated Farmers considers that this standard is urban centric, overly restrictive, and not appropriate for the full range of primary production buildings and structures. Primary production buildings are often located within the wide-open spaces of the rural areas, where considerably more	Amend CE-S2 by adding this exception: This standard does not apply to buildings and structures within the coastal environment that are: a. associated with primary production such as fences

Proposed District Plan provision	Reasons for Appeal	Relief Sought by Federated Farmers
provision	development can be tolerated without having adverse effects on the environment. CE-S3 as currently worded risks requiring routine farm buildings and structures to get a resource consent. This could create undue regulatory compliance requirements, costs and delays for little or no environmental benefit. An exception for rural production buildings and structures is preferred.	and gates, storage barns, farm implement sheds, livestock shelters for mustering areas, dairy sheds, shearing/wool sheds, and herd homes.
Part 2 – District Wide Matter	s – General District Wide Matters – NOISE-Noise	
Policy – NOISE-P1 Enable noise-generating activities in appropriate areas	Federated Farmers is concerned that this policy could be construed in rural areas as putting rural residential/lifestyle amenity values expectations above the need for primary production activities to emit noise. We suggest that this policy be amended to show that "amenity" is in the context of the predominant land uses in the relevant zone.	Amend NOISE-P1 to read: Enable the generation of noise from activities that: f. a. maintain the predominant land use(s) character and amenity values of the receiving zone(s) by appropriately controlling the types of activities and levels of noise permitted in each zone; and a. b. do not compromise the health, safety, and wellbeing of people and communities.
Policy NOISE-P2 Ensure noise effects from activities are compatible with the existing environment	Federated Farmers considers that the management of noise should reflect the predominant land use within each zone. It would be inappropriate for rural production activities that are normally noisy (such as operation of frost fans or bird-scaring devices) to be prevented from occurring in rural areas because of sensitive land uses such as rural lifestyle development where the occupants have chosen to live in rural areas.	Amend NOISE-P2 to read: Provide for other activities that generate noise, where these avoid, remedy, or mitigate any adverse effects, having regard to: a. the extent to which it avoids conflict with existing noise sensitive activities; b. whether the level of effects is compatible with the character and amenity of permitted activities in the relevant zone location and adjacent established activities and their operation; c. the compatibility of the noise with other noises generated from permitted zone activities, and other activities not controlled by the Plan, within the receiving zone; d. the degree to which the noise breaches the permitted

Proposed District Plan provision	Reasons for Appeal	Relief Sought by Federated Farmers
		noise standards for the receiving zone(s); e. whether adverse effects can be internalised to the site where the noise is generated and the extent to which they can be minimised at site boundaries; i. potential positive effects associated with the activity which is generating the noise; and j. the functional need for the activity to occur in that location.
Part 3 – Area Specific Matte	rs – Rural Zones – GRUZ- General Rural Zone	
Objective GRUZ-O3 Provision for primary production	This objective should be consistent with the National Policy Statement for Highly Productive Land, by ensuring that the productive capacity of rural land and resources is supported.	Amend GRUZ-O3 to read: The productive <u>capacity of rural</u> land and resources of the General Rural Zone support a range of primary production oriented and resource dependent activities that depend on the productive land resource and avoiding activities that constrain the productive capacity of rural land.
Policy GRUZ-P1 Compatible activities	This policy could be simplified so that each clause focuses only one on aspect, instead of trying to achieve potentially conflicting aims that have the potential to cause confusion when implemented. Federated Farmers considers that it is inappropriate to list the activities in clause (c) in this policy on compatible activities, as it implies that rural lifestyle development is compatible with the General Rural Zone, whereas in many situations this kind of development may not be compatible with existing or new permitted primary production activities.	Amend GRUZ-P1(a) and (b) to read: a. Enable primary production activities and ancillary activities that are compatible with the purpose of the General Rural Zone and productive capacity of rural land, character, and amenity values of the General Rural Zone. b. Provide for allowing, where appropriate, other activities that have a functional need or operational need to be located in the General Rural Zone that are not incompatible with primary production. Regarding clause (c), either amend to read: c. Provide for Avoid further rural lifestyle subdivision and development in the General Rural Zone where it impacts on the productive capacity of highly productive land. in

Proposed District Plan provision	Reasons for Appeal	Relief Sought by Federated Farmers
		appropriate locations where GRUZ-P1(a) and GRUZ-P1(b) are enabled or provided for. Or delete clause (c) in its entirety.
Policy GRUZ-P3 Rural character	This policy on rural character, as currently worded, could be interpreted in a way that conflicts with the overall purpose of the General Rural Zone. Clause (a) is potentially confusing as openness and predominance of vegetation are arguably conflicting aims and this would be inappropriate for this Zone. Clause (a) would be more at home in the Open Space Zone provisions. Regarding clause (e), Federated Farmers considers that residential development that does not have a functional need to be in the General Rural Zone should be avoided.	Amend GRUZ-P3 in the following way: Firstly, amend the chapeau of Policy GRUZ-P3 to read: Provide for subdivision, use, and development where it does not compromise the purpose, Support the character, and amenity of the General Rural Zone, by: Secondly, delete clause (a) in its entirety. Thirdly, amend clause (e) to read: eManaging the density and location of avoiding residential development that does not have a functional need to locate in the General Rural Zone; Fourthly, amend clause (h) to read: h. Avoiding, remedying, or mitigating reverse sensitivity effects on primary production activities.

Appendix 2: Federated Farmers' submission on the Proposed Plan

Appendix 2 is provided separately in the bundle of documents.

Appendix 3: The Proposed Plan Decisions Version

Appendix 3 is provided separately in the bundle of documents. An online version can be accessed here: https://www.wairarapaplan.co.nz/wairarapa-proposed-district-plan.

The decision reports can be accessed here: https://www.wairarapaplan.co.nz/decisions.

Appendix 4: Persons who made submissions on the Proposed Plan to be served with a copy of this appeal

List of Original Submitters in Alphabetical Order

Submitter name	Submission	Address for service
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Garrick Robert and Pamela Orene Wells Garry Daniell S205 Garry Daniell S205 Gary Daniell S205 Gary Daniell S205 Gaylene Leslie O'Connor S253 Genesis Energy Ltd S81 Geoffrey Lush Geoffrey Roberts S117 Geoffrey Roberts Gollins Commercial Limited S97 Chrisg@gollins.co.nz Greater Wellington Regional Council Greytown Heritage Trust S135 Carmelf@xtra.co.nz Haami Te Whaiti Hamish Qualtrough S58 Iazvqltd@outlook.co.nz Harvey Norman Properties (N.Z.) Limited Helios Energy Ltd S223 Sbrooks@heliosenergy.co.nz Heritage New Zealand Pouhere S249 Heritage New Zealand Pouhere Taonga (HNZPT) Horticulture New Zealand S221 Hyslop Homes S20 Jacobhyslop94@gmail.com Jark Wass S222 Jack Wass S222 Jack Wass S222 Jack Wass Garmelf@xtra.co.nz Jark Garmelf@scinghot.co.nz Jark Garmelf@scinghot.co.nz Jark Garmelf@scinghot.co.nz James Derek Gordon Milne S126 James Derek Gordon Milne S126 James Brickardson S147 James Richardson S197 James Richardson James Richardson S271 James Rouston James Wallace, Leslie Wallace Janes Burns S271 Janes Burns Janes Burns S271 Janes Burns S271 Janes Burns S271 Janes Burns S271 Janes Burns Janes Burns Janes Burns S271 Janes Burns		-	
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