

SUBMISSION

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Form 5

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

To: Carterton District Council, Masterton District Council and South Wairarapa District Council

Via email: submissions@wairarapaplan.co.nz

Submission on: **Proposed Wairarapa Combined District Plan**

Date: 19 December 2023

Submission by: Federated Farmers of New Zealand

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1. Federated Farmers of New Zealand Inc (**Federated Farmers**) could not gain an advantage in trade competition for this submission.
2. Please refer to the attached table for the specific provisions of the Proposed Wairarapa Combined District Plan (**Combined District Plan**) that our submission relates to. The table also contains the details of Federated Farmers' submission and whether we support or oppose the specific provisions on which we have submitted.
4. The relief sought by Federated Farmers is outlined in the table attached to this submission.
5. We wish to be heard in support of this submission.
6. If others make a similar submission, Federated Farmers will consider presenting a joint case with them at a hearing.
7. Federated Farmers seeks any consequential amendments necessary to give effect to the relief sought in each of the individual submission points made.

1.0 Introduction

- 1.1 Federated Farmers welcomes the opportunity to submit on Carterton District Council, Masterton District Council and South Wairarapa District Council (**the Councils**) Combined District Plan.
- 1.2 Federated Farmers acknowledges any submissions that have been made by individual members.
- 1.3 Federated Farmers are a primary sector organisation with a long and proud history of representing the needs and interests of New Zealand farmers involved in a range of rural businesses.
- 1.4 Farming has a strong presence in Wairarapa and contributes significantly to the Wairarapa region community and economy. Federated Farmers represent a variety of dairy, dry stock and arable farming land users and seeks to uphold and enhance the value of farming to the region.
- 1.5 Federated Farmers aim to add value to its members' farming businesses. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:
 - (a) our members may operate their business in a fair and flexible commercial environment;
 - (b) our members' families and their staff have access to services essential to the needs of the rural community; and
 - (c) our members adopt responsible management and environmental practices.
- 1.6 Federated Farmers is actively involved in district plan reviews across New Zealand. Primary production activities from our members make a significant contribution to the economic, social, and cultural well-being of New Zealand.
- 1.8 Regulation can come at a significant cost on financial and mental health within the primary sector. Federated Farmers want to ensure avoidance of regulatory costs that are unnecessary, and which place additional pressure on the primary industry for little or no environmental gain. Planning provisions designed to meet central government directions for climate change, biodiversity, outstanding natural features, and rural land use activities need to be carefully considered to ensure that decision making strikes the right balance between resource use and resource protection.

2.0 General Comments

- 2.1 In general, Federated Farmers members want a district plan that:
 - (a) balances environmental, cultural, social, and economic values;
 - (b) ensures rules are equitable, cost-effective, pragmatic and effects based;
 - (c) is written in plain English, is consistent and follows a clear, user-friendly format;
 - (d) acknowledges and rewards the positive impacts farming has on conservation; and
 - (e) recognises the importance of collaborating with communities to achieve desired environmental outcomes.
- 2.2 There is an expectation that Councils, when undertaking a plan review, will adopt a no-frills approach and only target what is necessary to manage and resolve any issues occurring in the district and to meet their responsibilities under the Resource Management Act 1991 (RMA).
- 2.3 Federated Farmers can appreciate that given the uncertainty in future planning frameworks that will be required through the current resource management reforms, a focus on the highest risk issues is a practical and pragmatic approach to district plan review.
- 2.4 Our members who work and live rurally play a critical role for the community contributing in economic, environmental, social, and cultural aspects of the district. It is essential that the Council takes this into consideration when making decisions impacting rural people.
- 2.5 Rural landowners and farmers are constantly interacting with both natural and built resources and rely heavily on these resources. Farmers and primary producers are very aware of the

importance of managing these resources effectively, responsibly, and sustainably in order to provide for the viability of both their businesses and the resources for future generations.

- 2.6 It is important that Councils use every means available to them to keep regulatory costs imposed on farmers as low as possible. Farmers and growers are price takers and cannot pass on rising costs to consumers. Rising farming costs (including Council costs) are the key driver behind farmers needing to continually raise farm productivity in order to remain viable. This usually results in intensification and, in turn, may place additional pressure on the district's resources.
- 2.7 The importance of the economic use of land needs to be recognised throughout the Combined District Plan. A sizable proportion of Wairarapa earn a living off the land, which provides not only for those families, but also to district and regional wealth.
- 2.8 A district plan should not be unnecessarily restrictive and should include a focus on non-regulatory methods such as education and partnerships rather than relying solely on regulation. Non-regulatory methods are effective in engaging resource users to collaborate with Councils towards achieving mutual goals and is a more efficient way of achieving 'buy-in' from resource users.
- 2.9 Resource users are more likely to engage and work proactively in partnership with Council when they have a sense of ownership of, and responsibility for, the targets and activities being conducted. It is important that resource users feel that they have played an active role in the decision-making process.
- 2.10 Education is a valuable tool, particularly for issues that are not well-known or where perceptions need adjusting. As people gain more accurate knowledge about issues important in the region, misconceptions will reduce. As a result, people will be more willing to proactively engage in non-regulatory solutions.
- 2.11 The need for some regulation is accepted but the Council needs to ensure that it is the most appropriate method before introducing a rule, or a requirement for landowners to adhere to.
- 2.12 In respect of our submissions, our suggested amendments are shown with ~~strikeout~~ for deletions and underlining for additional wording. In each of the individual submission points made, the decision sought includes any consequential amendments that may be required to any and all other related elements in the proposed plan.

FEDERATED FARMERS OF NEW ZEALAND INC SUBMISSION TO THE PROPOSED WAIRARAPA COMBINED DISTRICT PLAN

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
General				
Entire Plan	1	Support in part	Federated Farmers would like to congratulate the Councils for producing a quality version of its proposed Combined District Plan. The Combined District Plan is easy to understand and to navigate. Federated Farmers seeks that the Combined District Plan contains a resource management policy framework that enables primary production activities in rural areas to occur as existing uses, and with few barriers where it is sought to establish new primary production activities. The Councils appear to have focused on the essential matters for its district which includes rural industry and the rural environment. Federated Farmers is generally supportive of the direction that has been set in respect of rural industry, farming, and the rural environment. Some amendments are sought in our submission and are intended to provide clarity to some provisions and strengthen others.	Federated Farmers seeks the following relief: (a) The retention of the proposed direction for rural industry, farming, and rural environments in the proposed district plan subject to the amendments sought by Federated Farmers in its submission; and (b) That the Councils comprehensively address the issue of public access to the Coast and the related health and safety issues that result from this access particularly where access is across or adjacent to private property. (c) Any consequential amendments required as a result of the relief sought.
Part 1 Introduction and General Provisions – Interpretation				
Part 1 – Introduction and General Provisions – Interpretation - Definitions	2	Support	Federated Farmers support, where possible and applicable, the use of RMA, National Planning Standards and National Policy Statement definitions. Federated Farmers supports the proposed definitions for the following terms: • Conservation activities; • Farm Quarry; • Rural airstrip; • Hazard sensitive activities; • Productive capacity; • Seasonal worker accommodation; and • Significant hazardous facility.	Federated Farmers seeks the following relief: (a) The retention of definitions for Conservation activities; Farm quarry; Rural airstrip; Hazard sensitive activities; Seasonal worker accommodation and Significant hazardous facility as currently proposed in the Combined District Plan. (b) Any consequential amendments required as a result of the relief sought.

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Part 1 – Introduction and General Provisions – Interpretation – Definitions – New Definition - Ancillary rural earthworks	3	Support	Federated Farmers seeks the inclusion of a definition for ‘Ancillary rural earthworks’ in the Combined District Plan. Activities ancillary to primary production, which support primary production, should not have to apply for resource consent. The definition should encompass the activities listed below along with any related definitions that are required: • The tilling or cultivation of soil for the establishment and maintenance of crops and pasture; • Harvesting of crops; • The planting and removal of trees (e.g. Pest Species, willows), and riparian planting; • The digging of offal pits; • Burying dead stock and plant waste; • Digging post holes and drilling bores; • Installing and maintaining services such as water pipes and troughs; and • Farm quarries where excavated material is not removed from the farm site.	Federated Farmers seeks the following relief: (a) The inclusion of a definition for ‘Ancillary rural earthworks’ as outlined below or with wording to similar effect: <u>ANCILLARY RURAL EARTHWORKS means:</u> • <u>any earthworks or disturbance of soil associated with cultivation, land preparation (including the establishment of sediment and erosion control measures), for planting and growing operations of crops and pasture;</u> • <u>the harvesting of agricultural and horticultural crops (farming) and forests (forestry); and planting trees, removing trees and horticultural root ripping;</u> • <u>the maintenance and construction of facilities typically associated with farming and forestry activities. This includes (but is not limited to): farm/forestry tracks, roads, vehicle manoeuvring areas and landings, stock marshalling yards, stock races, silage pits, offal pits, farm effluent ponds, feeding pads, digging post holes, fencing and sediment control measures, drilling bores, the installation and maintenance of services such as water pipes and troughs, off-stream farm water storage dams, hard stand areas for stock, fertiliser storage pads, airstrips and helipads; and</u> • <u>Farm quarries where quarry winnings are only used within the farm quarry; and</u> (b) Any consequential amendments required as a result of the relief sought.
Part 1 – Introduction and General Provisions – Interpretation –	4	Support in part	Federated Farmers supports in part the proposed definition for <i>Agricultural aviation</i> . Aviation is used in primary production for a variety of reasons including stock management, crop monitoring, aerial spraying	Federated Farmers seeks the following relief:

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Definitions – Agricultural aviation			etc. Aviation is also used for ancillary activities to primary production such as transporting fencing equipment to remote places on the farm etc. Federated Farmers would like to see provision for ancillary activities to primary production in the definition for Agricultural aviation.	(a) Amend the ‘Agricultural aviation’ definition so that it reads: <i>Means intermittent operation of an aircraft from a rural airstrip or helicopter landing area for:</i> <i>primary production, biosecurity, or conservation activities including stock management, <u>lifting of fencing materials</u>, pest control, the application of fertiliser, agrichemicals, vertebrate toxic agents, frost management and associated refuelling, <u>and other activities ancillary to primary production; and</u></i> <i><u>Biosecurity activities; and</u></i> <i><u>Conservation activities.</u></i> (b) Any consequential amendments required as a result of the relief sought.
Part 1 – Introduction and General Provisions – Interpretation – Definitions – Environmental Compensation	5	Support in part	Federated Farmers supports defining <i>Environmental Compensation</i> . However, the current definition seems to be grammatically incorrect and should read “unavoided, unremedied and unmitigated...”.	Federated Farmers seeks the following relief: (a) Amend the ‘Environmental Compensation’ definition so that it reads: <i>Means any action (works, services, protection, restoration, enhancement, or restrictive covenants) as compensation for unavoidable, <u>unremedied</u>, and unmitigated adverse effects of the activity for which consent is being sought, including actions that provide measurable biodiversity outcomes that address residual adverse biodiversity effects arising from project development and which do not meet the thresholds of a biodiversity offset.</i>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				(b) Any consequential amendments required as a result of the relief sought.
Part 1 – Introduction and General Provisions – Interpretation – Definitions – Less hazard sensitive activities	6	Support in part	Federated Farmers supports in part the definition for <i>Less hazard sensitive activities</i> . We seek that the definition includes buildings associated with primary production activities to reflect the low level of risk these activities pose to people and property.	Federated Farmers seeks the following relief: (a) Amend the definition of ‘Less hazard sensitive activities’ to include: <i>Means activities that are less sensitive to natural hazards which are:</i> a. <i>Accessory buildings used for non-habitable purposes;</i> b. <i>Park management activity; and</i> c. <i>Buildings and structures associated with temporary activities;</i> d. <i><u>Non-habitable buildings and structures associated with primary production activities; and</u></i> e. <i><u>Rural industry activities.</u></i> (b) Any consequential amendments required as a result of the relief sought.
Part 1 – Introduction and General Provisions – Interpretation – Definitions – National Grid Subdivision Corridor	7	Support in part	Federated Farmers supports in part the inclusion of National Grid Subdivision Corridor as a means of safety and reverse sensitivity effects. We urge the Councils to be cautious and not to extend these corridors any further than what is minimally necessary, especially on private property.	Federated Farmers seeks the following relief: (a) Retention of the proposed definition for ‘National grid Subdivision Corridor’. (b) Any consequential amendments required as a result of the relief sought.
Part 1 – Introduction and General Provisions	8	Oppose in part	Federated Farmers opposes defining <i>Potentially hazard sensitive activities</i> to include Buildings associated with primary production	Federated Farmers seeks the following relief:

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
– Interpretation – Definitions – Potentially hazard sensitive activity			activities and, Rural industry activities. Where respective activities are non-habitable, these do not pose a ‘potential’ level of risk to people and communities. These activities should be included in the definition of ‘Less hazard sensitive activities’ and should be allowed to locate and exist within natural hazard areas.	(a) Amend the definition for Potentially hazard sensitive activities so that it reads: <i>Means activities that are potentially sensitive to natural hazards, which are:</i> a. Buildings associated with primary production; a. Commercial activities b. Industrial activities c. Rural industry activities (b) Any consequential amendments require as a result of the relief sought
Part 1 – Introduction and General Provisions – Interpretation – Definitions – New Definition – Reverse Sensitivity	9	Support	There is no definition of <i>Reverse sensitivity</i> in the Combined District Plan. Reverse Sensitivity is an important resource management issue for our members who operate activities vulnerable to legal complaints from sensitive activities located in rural areas. Federated Farmers seeks a definition of <i>Reverse sensitivity</i> to assist with interpretation of objectives, policies, and rules in the Combined District Plan.	Federated Farmers seeks the following relief: (a) The inclusion of a definition for ‘Reverse sensitivity’ which reads: <u><i>Reverse sensitivity</i></u> <u><i>Means the potential for the operation of an existing lawfully established activity to be compromised, constrained, or curtailed by the establishment or alteration of another activity which may be sensitive to the actual, potential, or perceived environmental effects generated by an existing activity.</i></u> (b) Any consequential amendments required as a result of the relief sought.
Part 1 – Introduction and General Provisions	10	Oppose	This definition serves no practical purpose, and together with Schedule 8 of the plan, should be deleted.	Federated Farmers seeks the following relief:

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
– Interpretation – Definitions – Special amenity landscapes				(a) Delete the ‘Special amenity landscapes’ definition. (b) Any consequential amendments required as a result of the relief sought.
Part 1 – Introduction and General Provisions – Interpretation – Definitions – Surface Waterbody	11	Oppose	Federated Farmers opposes the Surface Waterbody definition. The term ‘Waterbody’ is already defined in the Combined District Plan making this definition an unnecessary duplication.	Federated Farmers seeks the following relief: (a) Delete the ‘Surface Waterbody’ definition. (b) Any consequential amendments required as a result of the relief sought.
Part 2 District wide matters				
Strategic Direction				
CCR- Climate Change Resilience				
Part 2 – District Wide Matters – Strategic Direction – SDO-Strategic Direction Objectives – CCR-Climate Change Resilience – CCR-O1	12	Support in part	Federated Farmers supports in part strategic direction objective CCR-O1. In a changing regulatory environment with national targets to achieve a low carbon future it is important that those persons exercising functions and powers under the RMA assist the community to transition to a low carbon future. Many activities in rural areas are significantly impacted by climate change regulation which can have consequences on the local, regional, and national economy.	Federated Farmers seeks the following relief: (a) Amend CCR-O1 so that it reads: <i>The Wairarapa develops and functions in a way that assists <u>the community</u> in the transition to a low-carbon future.</i> (b) Any consequential amendments required as a result of the relief sought.
RE- Rural Environment				
Part 2 – District Wide Matters – Strategic Direction – SDO – Strategic Direction Objectives – RE- Rural Environment – RE-O1	13	Support	Federated Farmers supports RE-O1 which recognises the important contribution that the rural environment has to the region’s economic and social wellbeing.	Federated Farmers seeks the following relief: (a) The retention of RE-O1 or wording with similar intent. (b) Any consequential amendments required as a result of the relief sought.

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Part 2 – District Wide Matters – Strategic Direction – SDO – Strategic Direction Objectives – RE- Rural Environment – RE-O2	14	Support	Federated Farmers supports a strategic direction objective that focuses on protecting the productive capacity of primary production activities in the General Rural Zone. This recognises that primary production activities and their productive capacity need to be protected from any negative effects from sensitive or incompatible activities that seek to establish adjacent to them.	Federated Farmers seeks the following relief: (a) The retention of RE-O2 or wording with similar intent. (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Strategic Direction – SDO – Strategic Direction Objectives – RE- Rural Environment – RE- O3	15	Support	Federated Farmers supports RE-O3 which identifies the need to protect highly productive soils from inappropriate development.	Federated Farmers seeks the following relief: (a) The retention of RE-O3 or wording with similar intent. (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Strategic Direction – SDO – Strategic Direction Objectives – RE- Rural Environment – RE-O4	16	Support	Federated Farmers supports maintaining and enhancing the character of the rural environment.	Federated Farmers seeks the following relief: (a) The retention of RE-O4. (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Strategic Direction – SDO – Strategic Direction Objectives – RE- Rural Environment – RE-O5	17	Support	Federated Farmers supports RE-O5 as it sufficiently balances enabling rural lifestyle subdivision with enabling primary production and protecting the productive capacity of land.	Federated Farmers seeks the following relief: (a) The retention of RE-O5. (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Strategic Direction – SDO – Strategic Direction	18	Support	Federated Farmers acknowledge that we all must adapt to ensure sustainable management of natural and physical resources in accordance with the purpose of the RMA. Federated Farmers seeks the inclusion of an additional Strategic Direction Objective to recognise the importance	Federated Farmers seeks the following relief:

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Objectives – RE- Rural Environment – New Objective			of providing for and supporting land practice change to address biosecurity, climate, and environmental demands both from regulation and consumer demands. As regulation and markets are driving certain change and practices, the Combined District Plan needs to support this change to ensure economic viability for rural producers.	(a) The addition of a new objective RE-OX which reads: <i><u>Primary production activities are supported to adapt to change required by regulatory and consumer demands.</u></i> (b) Any consequential amendments required as a result of the relief sought.
UFD – Urban Form and Development				
Part 2 – District Wide Matters – Strategic Direction – SDO – Strategic Direction Objectives – UFD – Urban Form and Development – UFD-O2	19	Support	Federated Farmers supports UFD-O2 which sets the direction for urban growth in the Wairarapa’s urban areas. Efficient and effective planning for urban growth is important to ensure minimal loss of versatile soils.	Federated Farmers seeks the following relief: (a) The retention of UFD-O2. (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Strategic Direction – SDO – Strategic Direction Objectives – UFD – Urban Form and Development – UFD – O3	20	Support in part	Sufficient development capacity for recreational needs is beyond scope of the territorial authorities function under section 31(1)(a) of the RMA which is to ensure that there is sufficient development capacity to meet the expected demands of the district in respect of housing and business land. We acknowledge that the NPSUD definition of <i>community services</i> includes community facilities, educational facilities and those commercial activities that serve the needs of the community. However, Policy 5 of the NPSUD only requires the district plan to enable <i>community services</i> in Tier 3 Urban Environments, which only applies to Masterton urban area. South Wairarapa District Council and Carterton District Council have already determined they are not Tier 3 Urban Environments, as they have not deleted the requirements for on-site parking in their district jurisdictions in accordance with CI 3.38 of the NPSUD).	Federated Farmers seek the following relief: (a) Amend UFD-O3 so that it reads: <i><u>There is sufficient development capacity to meet the Wairarapa’s housing commercial and industrial, education and recreational needs within the Masterton urban area.</u></i> (b) Any consequential amendments required as a result of the relief sought.
Energy, Infrastructure and Transport				
ENG-Energy				

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Part 2 – District Wide Matters – Energy Infrastructure and Transport – ENG – Energy – Policy – ENG-P2	21	Support in part	Federated Farmers supports policy ENG-P2 in part. It is possible that this policy enables small-scale renewable electricity generation to occur on highly productive land. Where this occurs, the policy should ensure that the productive capacity of highly productive land is not impacted. The policy needs to give effect to clause 3.9 of the National Policy Statement for Highly Productive Land (NPS-HPL), as required by clause 3.9(4) of the NPS-HPL. This requires a policy which ensures that small-scale use and development of highly productive land has no impact on the productive capacity of the land provided and must: • Minimise or mitigate any actual loss or potential cumulative loss of the availability and productive capacity of highly productive land in the Wairarapa district; and • Avoid if possible, or otherwise mitigates any actual or potential reverse sensitivity effects on land-based primary production activities from the use or development.	Federated Farmers seeks the following relief: (a) Amend ENG-P2 so that it reads: <i>Enable small-scale renewable electricity generation where it is of a form and scale that <u>supports the productive capacity of highly productive land</u> and: avoids, remedies, or mitigates its adverse effects including:</i> <i><u>minimises or mitigates any actual loss or potential cumulative loss of the availability and productive capacity of highly productive land in the Wairarapa District; and</u></i> <i><u>avoid, or otherwise mitigate any actual or potential reverse sensitivity effects on land based primary production activities; and</u></i> <i><u>avoid, remedies, or mitigates other adverse effects.</u></i> (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Energy, Infrastructure and Transport – ENG- Energy – Policy – ENG-P3	22	Oppose in part	We are concerned the current wording ‘Encourage community-scale renewable electricity generation’ goes too far in compelling these renewable electricity generation activities. Using the word ‘encourage’ suggests the Combined District Plan will actively promote and incentivise community-scale renewable electricity generation activities. However, this could place an excessive burden on local governments and utilities to realise such proposals. Instead, we recommend changing the policy language to ‘Support consideration of community-scale renewable electricity generation.’ This revised wording would provide for these	Federated Farmers seeks the following relief: (a) amend ENG-P3 to read: Encourage <i>Support consideration of community-scale renewable electricity generation.</i> ... (c) the ability to <i>protecting the productive capacity of highly productive land;</i>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
			community-scale renewable electricity generation activities without obligating local authorities to advocate and marshal their establishment. It provides flexibility for communities to develop renewables at their own pace rather than mandating overt encouragement from governing bodies. We also express reservations regarding the phrasing of ENG-P3(c). The existing language, specifically “the ability to protect the productive capacity of highly productive land” is ambiguous and has the potential to be contradictory to the Objective and policies outlined in the National Policy Statement for Highly Productive Land (NPS-HPL). We suggest rephrasing the clause to align with the NPS-HPL more clearly.	... (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Energy, Infrastructure and Transport – ENG-Energy – Policy – ENG-P4	23	Support in part	Federated Farmers seek the amendment of policy ENG-P4(j) so that the phrasing more accurately aligns with the National Policy Statement for Highly Productive Land. As already stated in our submission, Federated Farmers seeks a definition of Reverse Sensitivity to assist with the interpretation of objectives, policies, and rules in the Combined District Plan.	Federated Farmers seeks the following relief: (a) The amendment of policy ENG-P4(j) so that it reads: ... <i>j. Potential effects on the productive capacity of land, including the ability to protecting the productive capacity of highly productive land.</i> ... (b) Any consequential amendments as a result of the relief sought.
Part 2 – District Wide Matters – Energy, Infrastructure and Transport – ENG-Energy – Policy – ENG-P5	24	Support	Federated Farmers supports the proposed policy ENG-P5 as it recognises the need to manage new development and land use activities near existing renewable electricity generation activities to minimise reverse sensitivity effects.	Federated Farmers seeks the following relief: (a) The retention of policy ENG-P5 as proposed. (b) Any consequential amendments required as a result of the relief sought.

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Part 2 – District Wide Matters – Energy, Infrastructure and Transport – ENG-Energy – Policy – Rules	25	Support	Federated Farmers would like to express overall support for the rules outlined in the ENG-Energy chapter of the Combined District Plan. We specifically endorse the heightened activity status for the General Rural Zone. This is consistent with the overarching Objective of the National Policy Statement for Highly Productive Land (NPS-HPL), while concurrently acknowledging the benefits to be derived from the use and development of renewable energy under section 7(j) of the RMA and the National Policy Statement for Renewable Electricity Generation 2011.	Federated Farmers seeks the following relief: (a) The retention of the ENG-Energy chapter rules as currently proposed. (b) Any consequential amendments required as a result of the relief sought.
NU- Network Utilities				
Part 2 – District Wide Matters – Energy, Infrastructure and Transport – NU-Network Utilities – Objective – NU-O2	26	Support	Federated Farmers supports NU-O2 as currently proposed. This objective recognises that network utilities can have adverse effects on the environment. The objective achieves an appropriate balance between addressing impacts on the environment and recognising the functional and operational needs of network utilities.	Federated Farmers seeks the following relief: (a) The retention of objective NU-O2 as proposed. (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Energy, Infrastructure and Transport – NU-Network Utilities – Objective – NU-O3	27	Oppose	Existing network utilities (within Network Utility Corridors) and Designated Network Utility Land should be protected only within Network Utility Corridors. Extending protection of network utilities beyond the Network Utility Corridor is unnecessary and provides no certainty for private landowners as to what they are entitled to do on their own 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. The Combined District Plan should not be used as a mechanism to circumvent negotiation and agreement with private landowners.	Federated Farmers seeks the following relief: (a) The amendment of Objective NU-O3 to read: <i>The safe function and operation of network utilities is protected from the adverse effects, including reverse sensitivity effects of incompatible subdivision use and development <u>within existing network utility corridors or within designated network utility land.</u></i> (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Energy, Infrastructure and Transport – NU-	28	Oppose	The National Grid should be protected only within the National Grid Corridor. Extending protection of network utilities beyond these areas is unnecessary and provides no certainty for private landowners as to what they are entitled to do on their own land. If network utility operators wish	Federated Farmers seeks the following relief: (a) Amend NU-O4 so that it reads:

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Network Utilities – Objective – NU-O4			to negotiate additional ‘protection’ outside National Grid Corridors, then they are free to negotiate access arrangements with private landowners. The Combined District Plan should not be used as a mechanism to circumvent negotiation and agreement with private landowners.	<i>Subdivision, use and development <u>within the national grid corridor</u> 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.</i> (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Energy, infrastructure, and Transport – NU – Network Utilities – Policy – NU-P6	29	Oppose	As per above, protection for the National Grid should not extend beyond the National Grid Corridor.	Federated Farmers seeks the following relief: (a) Amend NU-P6 so that it reads: <i>Manage subdivision, use and development near <u>within</u> the National Grid Corridor to:</i> <i>a. avoid the establishment or expansion of sensitive activities;</i> <i>b. Ensure that the safe and efficient operation, maintenance, repair, upgrading, removal, and development of the National Grid is not compromised; and</i> <i>c. Ensure that reverse sensitivity effects on the National Grid are avoided.</i> (b) Any consequential amendments required as a result of the relief sought
Part 2 – District Wide Matters – Energy, Infrastructure and Transport – NU-	30	Support in part	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, their establishment, operation and upgrading can have on existing lawfully established activities in the rural	Federated Farmers seeks the following relief:

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Network Utilities – Rules			environment. The Councils appear to have focused primarily on reverse sensitivity impacts related to network utilities, potentially to the detriment of other duly established activities. The Councils, by classifying many network utility activities as permitted activities, have not considered reverse sensitivity impacts on existing rural activities. This places an additional burden on landowners in the rural environment to work out how they can continue their operations around the restrictions network utilities bring with them.	(a) The reconsideration of the permitted activity classification for rules which allow network activities to occur which will adversely impact on existing rural activities and operations; and (b) The addition of a new matter of discretion for restricted discretionary and discretionary activities that reads: <i><u>The potential adverse effects on the operation of existing farming and rural activities located in the general rural and rural lifestyle zones.</u></i> (c) Any consequential amendments required as a result of the relief sought.
TR-Transport				
Part 2 – District Wide Matters – Energy, Infrastructure and Transport – TR – Transport – Objective-TR-O2	31	Support	Objective TR-O2 is supported by Federated Farmers as it recognises and provides for adverse effects from transport to be avoided remedied or mitigated.	Federated Farmers seeks the following relief: (a) The retention of objective TR-O2 as proposed. (b) Any consequential amendments requires as a result of the relief sought.
Part 2 – District Wide Matters – Energy, Infrastructure and Transport – TR-Transport – Policy – TR-R6	32	Support in part.	Federated Farmers supports TR-P6 as it provides for the management of adverse effects from transport on adjacent activities. However, we propose that the wording should encompass the effects management hierarchy similar to TR-O2.	Federated Farmers seek the following relief: (a) Amend Policy TR-P6 so that it reads: <i>Provide for the development and safe operation of the transport network, including the state highway network and rail network, while managing avoiding, remedying, or mitigating the adverse effects of the development and use of roads, including state highways, on adjacent activities</i>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				(b) Any consequential amendment as a result of the relief sought.
Hazards and Risks				
CL- Contaminated Land				
Part 2 – District Wide Matters – Hazards and Risks – CL- Contaminated Land – Entire Chapter	33	Support	Federated Farmers support the planning approach adopted by Council in response to contaminated land.	Federated Farmers seeks the following relief: (a) Retain the CL- Contaminated Land chapter as proposed. (b) Any consequential amendments required as a result of the relief sought.
HAZ-Hazardous Substances				
Part 2 – District Wide Matters – Hazards and Risks – HAZ – Hazardous Substances – Entire Chapter	34	Support	Federated Farmers supports the planning approach adopted by Council in response to Hazardous Substances.	Federated Farmers seeks the following relief: (a) Retain the Hazardous Substance Chapter as proposed. (b) Any consequential amendments required as a result of the relief sought.
NH- Natural Hazards				
Part 2 – District Wide Matters – Hazards and Risks – NH- Natural Hazards – Entire Chapter	35	Support in part	An important function of territorial authorities under section 31(1)(b)(i) of the RMA is the control of land use for the purpose of avoiding or mitigating adverse effects from natural hazards such as floods and earthquakes. For our members, who operate land-based agricultural businesses, it is important that the Councils exercises this function in a way that adequately balances allowing people and communities to use their property and undertake activities while also ensuring that lives and significant assets are not harmed or lost as a result of a natural hazard events. Federated Farmers supports the risk-based approach to natural hazards that the Council has taken.	Federated Farmers seeks the following relief: (a) The retention of the NH-Natural Hazards Chapter incorporating amendments sought by Federated Farmers as set out below. (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Hazards and	36	Oppose	Federated Farmers does not understand how using natural features will reduce the susceptibility of people, communities, property, and	Federated Farmers seeks the following relief:

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Risks – NH- Natural Hazards – Objectives – NH-O2			infrastructure to damage from natural hazards. Using natural features is not a risk-based approach to managing the effects of natural hazard on people and communities.	(a) Delete NH-O2. (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Hazards and Risks – NH- Natural Hazards – Policy – NH-P1	37	Support in part	Federated Farmers supports identifying and mapping areas affected by natural hazards provided a risk-based approach is used to identify these areas. We also encourage the Councils to engage with relevant impacted landowners who are located within those areas. Federated Farmers supports the management of subdivision use and development in these areas based on the sensitivity of the activities to the impacts of natural hazards posed to people’s lives, wellbeing, and property. Federated Farmers believes that NH-P1 would read better if it were split into two separate policies.	Federated Farmers seeks the following relief: (a) Amend NH-P1 so that it reads: <i>“Identify and map areas affected by natural hazards <u>using a risk-based approach</u> and take a risk-based approach to the management of subdivision use and development based on:</i> 1. the sensitivity of the activities to the impacts of natural hazards and 2. The hazard posed to people's lives and wellbeing and property by considering the likelihood and consequences of differing natural hazard events (b) Insert a new policy NH-PX – Subdivision Use and Development of Natural Hazard areas which reads: <i>Take a risk-based approach to the management of subdivision use and development based on:</i> <i>1. the sensitivity of the activities to the impacts of natural hazards and</i> <i>2. The hazard posed to people's lives and wellbeing and property by considering the likelihood and consequences of differing natural hazard events.</i>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				(c) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters - Hazards and Risks – NH – Natural Hazards – Policies - NH-P2, NH-P3	38	Support in part	Federated Farmers supports in part NH-P2 and NH-P3. We agree that hazard sensitive activities should not be located in high hazard areas and that hazard sensitive activities should be allowed in moderate hazard areas provided the requirements in NH-P3 are met. Federated Farmers opposes defining potentially hazard sensitive activities to include Buildings associated with primary production activities and, rural industry activities. The respective activities are non-habitable and do not pose a ‘potential’ level of risk to people and communities. As such, they should be permitted to locate within all natural hazard areas.	Federated Farmers seeks the following relief: (a) Retain NH-P2 and NH-P3 where the definition of Potentially sensitive activities is amended to exclude Buildings associated with primary production activities and rural industry activities. (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters - Hazards and Risks – NH – Natural Hazards - Policy – NH-P5	39	Support in part	Federated Farmers supports this policy subject to the amended definition of Potentially hazard sensitive activities sought by Federated Farmers.	Federated Farmers seeks the following relief: (a) Retain NH-P5 where the definition of Potentially sensitive activities is amended to exclude buildings associated with primary production activities and rural industry activities. (b) Any consequential amendments required as a result of the relief sought.
Part 2 - District Wide Matters – Hazards and Risks – NH- Natural Hazards – Policy – NH-P10	40	Support in part	Federated Farmers seeks to ensure that mitigation works involving private land within natural hazard areas 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. Additionally, Federated Farmers seeks to clarify that this policy will not limit the landowners’ rights to carry out natural hazard mitigation or stream and river management works on their land.	Federated Farmers seeks the following relief: (a) Amend NH-P10 so that it reads: <i>Enable natural hazard mitigation or stream and river management works undertaken by a statutory agency or their nominated contractors or agents within hazard areas where these will significantly decrease the existing risk to</i>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				<i>people's safety and wellbeing, property, and infrastructure in accordance with powers in relation to construction of works on private land under the Local Government Act 2002.</i> (b) Any consequential amendments required as result of the relief sought.
Part 2 – District Wide Matters – Hazards and Risks – Natural Hazards – Rule – NH-R1	41	Support in part	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 such as drainage works without permission from Council.	Federated Farmers seeks the following relief: (a) Amend NH-R1 so that flood mitigation or stream or river management works ahead of extreme weather events is a permitted activity for landowners. (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Hazards and Risks – NH- Natural Hazards – Rule – NH-R3	42	Support in part	One of the consequences of including Buildings associated with primary production and, Rural industry activities in the definition of Potentially hazard sensitive activities is that farmers would have to comply with finished floor level requirements as stated in NH-R3. We think it is unreasonable for farmers to have to comply with finished floor level requirements. This is an onerous mitigation measure that is not relative to the risk to people's lives, wellbeing because of the non-habitable nature of these buildings.	Federated Farmers seeks the following relief: (a) Retain NH-R3 as proposed provided that Buildings associated with primary production and, Rural industry activities are removed from the definition of Potentially hazard sensitive activities. (b) Any consequential amendments required as a result of the relief sought.
Historical and Cultural Values				
HH-Historic Heritage				
Part 2 – District Wide Matters – Historical and Cultural Values – HH- Historic Heritage – Entire Chapter	43	Support	Federated Farmers supports the overall objectives, policies, and rules in the Historic Heritage chapter of the Combined District Plan.	Federated Farmers seeks the following relief: (a) Retain the HH- Historic Heritage Chapter as currently proposed.

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				(b) Any consequential amendments required as a result of the relief sought.
TREE- Notable Trees				
Part 2 – District Wide Matters – Historical and Cultural Values – TREE-Notable Trees - Entire Chapter	44	Support	Federated Farmers supports the overall objectives, policies, and rules in the Historic Heritage chapter of the Combined District Plan.	Federated Farmers seeks the following relief: (a) the retention of TREE-Notable Trees Chapter as proposed. (b) Any consequential amendments required as a result of the relief sought.
SASM – Sites and Areas of Significance to Māori				
Part 2 – District Wide Matters – Historical and Cultural Values – SASM – Sites and Areas of Significance to Māori – Objective – SASM-O1	45	Support in part	‘Recognition’ of <i>sites and areas of significance to Māori</i> (SASM) may result in broad capture of private land with new SASM layers. We are concerned that the broad remit of ‘recognition’ provides no certainty for private landowners as to what they are entitled to do on their own land in this situation. If the Councils wish to negotiate ‘protections’ for the newly recorded SASMs on private land, then they are free to negotiate with the landowner(s). ‘Identification’ of SASMs would be a more appropriate objective. Then the process of negotiation over management of these sites could occur.	Federated Farmers seeks the following relief: (a) Amend SASM-O1 so that it reads: <i>Sites and areas of significance to Māori are recognised identified in order to enable the Council and Māori to make arrangements with landowners for such sites and areas to be protected and maintained;</i> (b) Any consequential amendments required as a result of the relief sought.

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Part 2 – District Wide Matters – Historical and Cultural Values – SASM – Sites and Areas of Significance to Māori – Objective – SASM-O2	46	Support in part	Exercise of kaitiakitanga by tangata whenua in relation to sites and areas of significance to Māori provides no certainty for private landowners as to what they are entitled to do on their own land. If the Councils wish to negotiate exercise of kaitiakitanga in relation to sites and areas of significance to Māori that might occur on or form part of private land, then they are free to negotiate with the landowner(s) to do so. The Combined District Plan should not be used as a mechanism to circumvent negotiation and agreement with private landowners.	Federated Farmers seeks the following relief: (a) Amend SASM-O2 so that it reads: <i>Tangata whenua can exercise kaitiakitanga in relation to sites and areas of significance to them in the Wairarapa, <u>except for any such sites and areas that are identified on private land, unless the landowners have agreed that tangata whenua can exercise kaitiakitanga on such land...</u></i> (b) Any consequential amendments required as a result of the relief sought
Part 2 – District Wide Matters – Historical and Cultural Values – SASM – Sites and Areas of Significance to Māori – Objective – SASM-O3	47	Support in part	Protection of sites and areas of significance to Māori should not occur on private land without agreement of landowners. If the Councils wish to negotiate exercise of Kaitiakitanga on private land, then they are free to negotiate with the landowner(s).	Federated Farmers seeks the following relief: (a) Amend SASM-O3 so that it reads: <i>a. Sites and areas of significance to Māori are protected from inappropriate subdivision, use and development, <u>except for any such sites and areas that are identified on private land, unless the landowners have agreed to protect such sites from inappropriate subdivision use and development.</u></i> (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Historical and Cultural Values – SASM – Sites and Areas of	48	Support in part	Protection of sites and areas of significance to Māori should not occur on private land without agreement of landowners. If the Councils wish to negotiate exercise of Kaitiakitanga on private land, then they are free to negotiate with the landowner(s).	Federated Farmers seeks the following relief: (a) Amend SASM-P2so that it reads:

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Significance to Māori – Policy – SASM-P2				<i>Where agreement has been reached with landowners, protect and maintain sites and areas of significance to Māori by:</i> <i>a. Ensuring sites and areas of significance to Māori are not modified, destroyed, removed and/or visually encroached upon by inappropriate activities;</i> <i>b. Requiring 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</i> <i>c. Enabling maintenance and restoration of sites and areas of significance to Māori where the cultural spiritual and historical values, interests, associations of importance to tangata whenua of the sites or area are protected;</i> (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Historical and Cultural Values – SASM – Sites and Areas of significance to Māori – Policy – SASM-P3	49	Support in part	Restrictions on earthworks within sites and areas of significance to Māori should not occur on private land without agreement of landowners. If the Councils wish to negotiate exercise of Kaitiakitanga on private land, then they are free to negotiate with the landowner(s).	Federated Farmers seeks the following relief: (a) Amend SASM-P3 so that it reads: <i>Allow for:</i> <i>a. Small-scale earthworks for burials within existing urupa; and</i> <i>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:</i> <i>i. The extent of the earthworks</i>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				ii. The manner in which the earthworks are undertaken; iii. The monitoring of earthworks; and iv. The cultural, spiritual, and historical values, interests, associations of importance to tangata whenua of the site or area. <u>This shall not apply to identified sites and areas of significance to Māori that are on private land unless agreement has been reached with landowners to restrict earthworks within such sites and areas.</u> (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Historical and Cultural Values – SASM – Sites and Areas of significance to Māori – Policy –SASM-P4	50	Support in part	Restrictions of activities within sites and areas of significance to Māori should not occur on private land without agreement of landowners. If the Councils wish to negotiate exercise of Kaitiakitanga on private land, then they are free to negotiate with the landowner(s).	Federated Farmers seeks the following relief: (a) Amend the SASM-P4 so that it reads: <i>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, interests, or associations of importance to tangata whenua:</i> a. Land disturbance; b. Demolition or removal of existing buildings and structures where the structure is not or does not form part of the site or area; c. Alterations to existing buildings and structures; d. Operation, maintenance, and repair or upgrading of existing network utility structures; and e. Erection of signs.

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				<u><i>This shall not apply to identified sites and areas of significance to Māori that are on private land unless agreement has been reached with landowners to restrict activities within such sites and areas.</i></u> (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Historical and Cultural Values – SASM – Sites and Areas of significance to Māori – Policy –SASM-P5	51	Support in part	Restrictions of subdivision, use and development within sites and areas of significance to Māori should not occur on private land without agreement of landowners. If the Councils wish to negotiate exercise of Kaitiakitanga on private land, then they are free to negotiate with the landowner(s).	Federated Farmers seeks the following relief: (a) Amend SASM-P5 so that it reads: <i>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:</i> <i>a. Whether there are any alternative methods, locations, or designs that would avoid or reduce the impact on the values, interests, or associations of importance to tangata whenua associated with the site or area of significance;</i> <i>b. Outcomes articulated by tangata whenua through an assessment of environmental effects, cultural impact assessment, or iwi planning documents;</i> <i>c. The protection and maintenance or potential enhancement of the values, interests, or associations of importance to tangata whenua of the site or area of significance and the relationship of tangata whenua with their taonga, commensurate with the scale and nature of the proposal.</i>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				d. How values of significance to tangata whenua, including tikanga, kaitiakitanga, and 43 atauranga Māori may be incorporated and e. For subdivision, ensure sufficient land is provided around the site or area of significance to Māori to protect values, interests, or associations of importance to tangata whenua and the remainder of the site is a size which continues to provide it with a suitable setting to the values, interests, or associations of importance to tangata whenua of the site or area. <u>This shall not apply to identified sites and areas of significance to Māori that are on private land unless agreement has been reached with landowners to implement these restrictions within such sites and areas.</u> (b) Any consequential amendments required as a result of relief sought.
Part 2 – District Wide Matters – Historical and Cultural Values – SASM – Sites and Areas of significance to Māori – Policy –SASM-P6	52	Support in part	Special consideration and management of effects of activities within sites and areas of significance to Māori should not occur on private land without agreement from landowners. If the Council wish to negotiate exercise of Kaitiakitanga on private land, then they are free to negotiate with the landowner(s).	Federated Farmers seeks the following relief: (a) Amend SASM-P6 so that it reads: <i>Ensure the adverse effects of activities on sites and areas of significance to Māori are managed by:</i> a. <i>Avoiding activities within sites and areas of significance to Māori unless there is a functional need to do so and no practicable alternative location;</i> b. <i>Avoiding significant and adverse effects on the site or area's cultural spiritual and historical values; and</i> c. <i>For other adverse effects:</i>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				i. Where adverse effects cannot be avoided, they are minimised. ii. Where adverse effects cannot be minimised, they are remedied; and iii. Where more than minor residual adverse effects cannot be avoided, minimised, or remedied, the activity itself is avoided. <u>This shall not apply to identified sites and areas of significance to Māori that are on private land unless agreement has been reached with landowners to implement such consideration and management of effects of activities within such sites and areas.</u> (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Historical and Cultural Values – SASM – Sites and Areas of significance to Māori – Policy –SASM-P7	53	Support in part	Special restrictions on subdivision, use and development activities within sites and areas of significance to Māori should not occur on private land without agreement from landowners. Where the Council have negotiated such restrictions within sites on private land (which has historically been alienated and acquired by the crown and on-sold to private owners) then they should support the landowners.	Federated Farmers seeks the following relief: (a) Amend SASM-P7 so that it reads: <u>Where agreement has been reached with landowners to implement restrictions on subdivision, use and development activities within sites and areas of significance to Māori that are on private land, the Council shall support landowners to manage, maintain, preserve, and protect sites and areas of significance to Māori, including by:</u> a. increasing awareness, understanding, and appreciation within the local community of the presence and importance of sites and areas of significance to Māori;

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				<i>b. encouraging landowners to engage with local tangata whenua and/or manage and develop positive working relationships in respect of the ongoing management and/or protection of sites and areas of significance to Māori.</i> <i>c. promoting the use of matauranga Māori, tikanga and kaitiakitanga to manage, maintain, preserve, and protect sites and areas of significance to Māori through engagement and collaboration with tangata whenua;</i> <i>d. providing assistance to landowners to preserve, maintain, and enhance sites and areas of significance to Māori; and/or</i> <i>e. for sites in schedule 4, seeking to establish an extent through engagement and collaboration with tangata whenua.</i> (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters - Historical and Cultural Values – SASM – Sites and Areas of significance to Māori – Rule – SASM-R2	54	Support	We support the permitted activity status for SASM-R2 in allowing for activities necessary for day-to day farming operations.	Federated Farmers seeks the following relief: (a) The retention of rule SASM-R2 (b) Any consequential amendments required as a result of the relief sought.
Natural Environmental Values				
ECO-Ecosystems and Indigenous Biodiversity				
Part 2 – District Wide Matters – Natural Environment Values – Ecosystems and Indigenous Biodiversity – Objectives – ECO-O1	55	Oppose	Federated Farmers opposes Objective ECO-O1. Our opposition is grounded in the belief that this objective imposes an undue burden on landowners concerning the maintenance and enhancement of 'indigenous species and habitats.'	Federated Farmers seeks the following relief: (a) Amend ECO-O1 so that it reads:

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
			We find the wording of this objective to be inconsistent with the National Policy Statement for Indigenous Biodiversity, which aims for the maintenance and achievement of no net loss in indigenous biodiversity. We recommend an amendment of the objective's emphasis, focusing on the maintenance or enhancement of habitats for indigenous species. This adjustment is necessary for two reasons: firstly, it may not always be practical to both maintain and enhance such habitats simultaneously. Secondly, it is important to recognise that only habitats can be maintained or enhanced through human endeavour, as the maintenance or enhancement of specific species is ultimately determined by natural processes beyond human control.	<i>Maintain and or enhance the biological diversity of habitats of indigenous species and habitats within the Wairarapa.</i> (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Natural Environment Values – Ecosystems and Indigenous Biodiversity – Policies – ECO-P2	56	Support	Federated Farmers supports the proposed policy ECO-P2 which advocates collaboration with other agencies and organisations to undertake joint initiatives. We commend the Councils for recognising the importance of supporting landowners' initiatives in the protection and enhancement of indigenous biodiversity. Farmers, as active stewards of their land, play a vital role in maintaining and enhancing areas of indigenous biodiversity. Acknowledging and reinforcing the efforts of landowners in these initiatives is crucial. Their on-the-ground knowledge, commitment, and practical engagement are instrumental in achieving positive outcomes for biodiversity. We encourage the Councils to actively facilitate and recognise the valuable contributions of landowners, fostering a collaborative approach that leverages their expertise and commitment in the shared goal of maintaining or enhancing indigenous biodiversity in the Wairarapa region.	Federated Farmers seeks the following relief: (a) Retain ECO-P2 as currently proposed. (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Natural Environment Values –	57	Support in part	Federated Farmers supports policy in ECO-P3 but requests that engagement with affected landowners also occurs during the identification and mapping of areas that are habitats comprising	Federated Farmers seeks the following relief: (a) Amend Policy ECO-P3 it reads:

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Ecosystems and Indigenous Biodiversity – Policies – ECO-P3			significant indigenous vegetation or significant habitats of indigenous fauna in the Wairarapa. It is essential that affected landowners are part of the process in the identification and mapping of these areas so that they are aware of and have the ability to be involved with the determination of the area of the site.	<i>Identify those areas that are habitats comprising significant indigenous vegetation or significant habitats of indigenous fauna in the Wairarapa and involve landowners in the process of identification and determination of these areas.</i> (b) And any consequential amendments required to support the relief sought.
Part 2 – District Wide Matters – Natural Environment Values – Ecosystems and Indigenous Biodiversity – Policies – ECO-P4	58	Support in part	Federated Farmers’ position is that only sites where landowner(s) agreement has been reached, should be included in Schedules 5, 6, 7, 9, 10 or 11. (Schedule 8, and all relevant provisions for that schedule, should be deleted). If the Councils wish to negotiate scheduling of habitats comprising significant indigenous vegetation or significant habitats of indigenous fauna on private land in the Combined District Plan, then the Councils are free to negotiate with landowner(s) to do so. The Combined district plan should not be used as a mechanism to circumvent negotiation and agreement with private landowners.	Federated Farmers seeks the following relief: (a) Amend ECO-P4 so that it reads: <i>Protect those areas that are habitats comprising significant indigenous vegetation or significant habitats of indigenous fauna in the Wairarapa from inappropriate subdivision, land use, and development by:</i> <i>1. only providing for activities that demonstrate an operational need or functional need to be located in this area;</i> <i>2. ensuring areas are not removed in whole or part;</i> <i>3. requiring activities within or directly adjacent to these areas to avoid, remedy, or mitigate the adverse effects on the values of the area; and</i> <i>4. managing effects of vegetation modification within the margins of any natural wetlands and rely upon Resource Management (National Environmental Standards for Freshwater) Regulations 2020 in all other cases.</i> <u><i>This shall not apply to habitats comprising significant indigenous vegetation or significant habitats of indigenous fauna that are on private land unless agreement has been reached with landowners to include such sites and areas in the schedule of</i></u>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				<u>significant indigenous vegetation or significant habitats of indigenous fauna.</u> (b) And any consequential amendments required to support the relief sought.
Part 2 – District Wide Matters – Natural Environment Values – Ecosystems and Indigenous Biodiversity – Policies – ECO-P5	59	Support in part	A range of farm structures and facilities need to be included within the list of activities allowed under this policy in situations where scheduled habitats of significant indigenous vegetation or fauna are located on farmland. Existing farm access tracks and farm water supply pipelines in particular may need to be relocated to allow superior conservation solutions, albeit that any new replacement farm access tracks and pipelines may of necessity have to be wholly or partly within SNAs – depending on the location and situation.	Federated Farmers seeks the following relief: (a) Amend ECO-P5 so that it reads: <i>Enable the following activities relating to habitats comprising significant indigenous vegetation or significant habitats of indigenous fauna in the Wairarapa where they contribute to the protection, maintenance, and enhancement of the areas:</i> <i>1. removal of broken branches, deadwood, diseased vegetation, or exotic species;</i> <i>2. maintenance of the safety and efficiency of network utilities;</i> <i>3. maintenance of existing access tracks for network utilities;</i> <i>4. maintenance of existing <u>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;</u></i> <i>5. customary activities; and</i> <i>6. conservation activities.</i> (b) And any consequential amendments required to support the relief sought.

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Part 2 – District Wide Matters – Natural Environment Values – Ecosystems and Indigenous Biodiversity – Policies – ECO-P6	60	Oppose	Federated Farmers recognises the importance of ECO-P6 in managing effects on significant indigenous vegetation or habitat. However, we suggest refining the policy to focus primarily on threatened species, streamlining the approach for practicality. We emphasise the need for a balanced and flexible strategy, acknowledging the challenges landowners face in avoiding, remedying, or mitigating every adverse effect. We propose a revised policy that prioritises threatened species, ensuring effective biodiversity conservation while respecting practical constraints.	Federated Farmers seeks the following relief: (a) Amend ECO-P6 so that it reads: <i>Manage the effects of subdivision, use, and development of significant indigenous vegetation and significant habitats of indigenous fauna in the Wairarapa by:</i> <i>avoiding the loss or degradation of areas of significant indigenous vegetation and significant habitats of indigenous fauna in preference to remediation or mitigation;</i> <i>avoiding the loss of habitat that supports or provides a key life function for Threatened or At-Risk indigenous species; and</i> <i>requiring that any unavoidable <u>more than minor</u> adverse effects on areas of significant indigenous vegetation and significant habitats of indigenous fauna are remedied or mitigated.</i> <i>More than minor residual adverse effects on significant indigenous vegetation and significant habitats of indigenous fauna, outside the Coastal Environment, that cannot be avoided, remedied, or mitigated in accordance with clauses 1 – 3 above shall be offset, or if biodiversity offsetting cannot be reasonably achieved, shall be addressed through environmental compensation.</i> (b) And any consequential amendments required to support the relief sought.

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Part 2 – District Wide Matters – Natural Environment Values – Ecosystems and Indigenous Biodiversity – Policies – ECO-P8	61	Oppose	Federated Farmers considers this policy unduly onerous. It will have the perverse effect of discouraging people from choosing to voluntarily plant indigenous vegetation and will encourage people to choose to plant exotic vegetation instead. This will have a counterproductive impact on indigenous biodiversity.	Federated Farmers seeks the following relief: (a) Delete Policy ECO-P8. (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Natural Environment Values – Ecosystems and Indigenous Biodiversity – Policies – ECO-P9	62	Support	Federated Farmers supports policy ECO-P9 affirming the commitment to support and encourage the protection and restoration of natural habitats on private land. It is crucial to recognise that farmers, as active stewards of the land, are already proactively engaged in initiatives that contribute to positive conservation outcomes. This includes voluntary efforts to protect and restore natural habitats, highlighting a genuine commitment to environmental stewardship.	Federated Farmers seeks the following relief: (a) Retain ECO-P9 as proposed. (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Natural Environment Values – Ecosystems and Indigenous Biodiversity – Rules – ECO-R1	63	Support in part	Federated Farmers supports the permitted activity status outlined in ECO-R1 for the modification of indigenous vegetation within a Significant Natural Area, with particular appreciation for provisions v. and vi. These provisions permit the removal or trimming of vegetation branches as necessary to prevent interference with lawfully established structures, buildings, and fence lines. We recommend an expansion of the rule to encompass other lawfully established activities essential to the daily operations and maintenance of a farm, such as pasture, drains and farm tracks. This inclusive approach ensures that the rule adequately addresses the practical needs of farmers while maintaining the necessary balance for environmental conservation within Significant Natural Areas.	Federated Farmers seeks the following relief: (a) Amend ECO-R1 (1)(a)(v) so that it reads: <i>v. required to remove or trim branches of vegetation to the extent necessary to avoid them interfering with lawfully established <u>pasture, drains, farm tracks, structures, buildings, fence lines, network utilities, existing roads or access tracks</u>;</i> (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Natural Environment Values – Ecosystems and Indigenous Biodiversity – Rules – ECO-R2	64	Support	Federated Farmers supports the permitted activity status outlined in ECO-R2 for the modification of indigenous vegetation outside a Significant Natural Area.	Federated Farmers seeks the following relief: (a) The retention of the ECO-R2 as currently proposed. (b) Any consequential amendments required as a result of the relief sought.

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
NATC-Natural Character				
Part 2 – District Wide Matters – Natural Environmental Values – NATC- Natural Character – Policy – NATC-P1	65	Oppose in part	The Combined District Plan uses a definition of Surface waterbody that captures artificial drains. This will result in needless delays and costs from capturing day-to-day maintenance of artificial channels and drains in resource consent processes. Artificial channels and drains should be exempt from this policy.	Federated Farmers seeks the following relief: (a) Amend NATC-P1 so that it reads: <i>Manage the design, location, and scale of subdivision, use and development adjoining surface waterbodies so they preserve the special qualities and natural character of surface waterbodies (not including artificial channels and drains).</i> (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Natural Environmental Values – NATC- Natural Character – Policy – NATC-P3	66	Support	Federated Farmers supports allowing earthworks within 25m of significant waterbodies where they are for the purpose of maintenance works on infrastructure such as maintaining drains, man-made dams, access tracks or roads.	Federated Farmers seeks the following relief: (a) Retain NATC-P3 as proposed. (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Natural Environmental Values – NATC- Natural Character – Policy – NATC-P5	67	Oppose in part	The Combined District Plan uses a definition of surface waterbody that captures artificial drains. This will result in needless delays and costs from capturing day-to-day maintenance of artificial channels and drains in resource consent processes. Artificial channels and drains should be exempt from this policy.	Federated Farmers seeks the following relief: (a) Amend NATC-P5 so that it reads: <i>Discourage buildings and structures within 10m of surface waterbodies (not including artificial channels and drains) within the General Rural Zone, 5m of any surface waterbody in any other zone and 25m of significant waterbodies across all zones and only allow buildings and structures within these setbacks where:</i> <i>a. there is a functional need or operational need for their location within the setback;</i> <i>b. the location, intensity, scale, design, and form of the building or structure preserves natural character values; and</i>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				<i>c. any potential cumulative effects on natural character values are minimised.</i> (b) Any consequential amendments required as a result of the relief sought.
NFL – Natural Features and Landscapes				
Part 2 – District Wide Matters – NFL – Natural Features and Landscapes – Objective – NFL-O2	68	Oppose	There is no need to recognise or manage ‘special amenity landscapes’ as a separate phenomenon. Amenity values (which include amenity within landscape settings) can be appropriately managed through other plan provisions, such as appropriate development standards for appearance, bulk, height, location, and setbacks of structures within appropriate Zone Framework rules. Regulatory frameworks should err on the side of a ‘less restrictive regime’ where the purposes of the Act and the objectives of the plan can be so met (following the principle in <i>Royal Forest and Bird Protection Society Inc v Whakatane District Council</i> [2017] NZEnvC 51 at [59]).	Federated Farmers seeks the following relief: (a) Delete Objective NFL-O2 (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – NFL – Natural Features and Landscapes – Policy – NFL-P2	69	Oppose	Federated Farmers considers that there is no need to recognise or manage ‘special amenity landscapes’ as a separate phenomenon. Amenity values (which include amenity within landscape settings) can be appropriately managed through other plan provisions, such as appropriate development standards for appearance, bulk, height, location, and setbacks of structures within the appropriate Zone Framework rules. Regulatory frameworks should err on the side of a ‘less restrictive regime’ where the purposes of the Act and the objectives of the plan can be so met (following the principle in <i>Royal Forest and Bird Protection Society Inc v Whakatane District Council</i> [2017] NZEnvC 51 at [59]).	Federated Farmers seeks the following relief: (a) Delete Policy NFL-P2 (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – NFL – Natural Features and Landscapes – Policy – NFL-P3	70	Oppose	Federated Farmers opposes policy NFL-P3 because rural production activities and ancillary farm buildings situated within rural areas should not be caught in resource consent process under a landscape management regime, because that would result in unnecessary costs and delays for little or no environmental benefit.	Federated Farmers seeks the following relief: (a) Amend policy NFL-P3 to read:

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				<i>Only allow subdivision, use, and development within an identified Outstanding Natural Feature and Landscape where it:</i> <i>a. avoids significant adverse effects and avoids, remedies, or mitigates any other adverse effects on the identified characteristics and values of the Outstanding Natural Feature and Landscape;</i> <i>b. is demonstrated it is appropriate by:</i> <i>i. having an operational need or functional need to be located in this area;</i> <i>ii. minimising earthworks and changes to the landform;</i> <i>iii. reducing the scale and prominence of any buildings or structures, including any proposed building platforms, and integrating landform and context into the design and through the use of naturally occurring building platforms and sympathetic materials;</i> <i>iv. avoiding or minimising the removal of any indigenous vegetation;</i> <i>v. enabling the repair, maintenance, and removal of existing infrastructure; and</i> <i>vi. enabling the continuation, or enhancing, of tangata whenua cultural and spiritual values and customary activities; <u>and</u></i> <i>vii. <u>enables rural production activities (including ancillary farm buildings) to operate efficiently and to make effective use of the land resource of the General Rural Zone.</u></i> (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – NFL – Natural Features and	71	Oppose	Federated Farmers opposes policy NFL-P5 because rural production activities and ancillary farm buildings situated within rural areas should not be caught in resource consent process under a landscape	Federated Farmers seeks the following relief:

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Landscapes – Policy – NFL-P5			management regime, because that would result in inefficient and unnecessary costs and delays for little or no environmental benefit.	(a) Amend policy NFL-P5 to read: <i>Allow subdivision, use, and development within an Outstanding Natural Features and Landscapes where it is associated with conservation activities or <u>rural production activities and ancillary farm buildings, or:</u></i> <i>a. it relates to the maintenance, repair, or removal of existing infrastructure;</i> <i>b. there is a functional need or operational need for the activity to be located in the Outstanding Natural Features or Landscapes;</i> <i>c. the form, scale, and nature of the activity will not detract from the characteristics and values of the Outstanding Natural Features and Landscapes by:</i> <i>i. integrating landform and context into the design and through the use of naturally occurring building platforms and sympathetic materials;</i> <i>ii. limiting the prominence or visibility of built form, including by integrating it into the natural landform; and</i> <i>iii. restoring or reinstating areas of earthworks and replanting areas of modification of vegetation; and</i> <i>d. the activity is consistent with Policies NFL-P3 and NFL-P4.</i> (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – NFL – Natural	72	Oppose	Federated Farmers opposes standard NFL-S1 because rural production activities situated within rural areas should not be caught in resource	Federated Farmers seeks the following relief:

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Features and Landscapes – Standards – NFL-S1			consent process under an earthworks management regime. This would result in inefficient and unnecessary costs and delays for little or no environmental benefit.	(a) Amend policy NFL-S1 to read: 1. <i>Earthworks must not exceed:</i> a. <i>a maximum cut or fill height greater than 1.5m above ground level; and</i> b. <i>a maximum area of 50m² per site.</i> <i>This standard does not apply to:</i> <i>Earthworks associated with maintaining existing farm tracks, <u>water supply pipelines, farm water supply dams, farm drains, livestock mustering yards, farm vehicle hard stand areas, airstrips, sileage pits, fence lines, and access ways</u> are exempt from the above area standards but must comply with NFL-S1(1)(a).</i> (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – NFL – Natural Features and Landscapes – Standards – NFL-S2	73	Oppose	Federated Farmers opposes standard NFL-S2 because rural production activities situated within rural areas should not be caught in resource consent process under an indigenous vegetation clearance/modification regime. To do so would result in inefficient and unnecessary costs and delays for little or no environmental benefit.	Federated Farmers seeks the following relief: (a) Amend policy NFL-S2 to read: 1. <i>Modification of indigenous vegetation must not exceed, in total area, 50m² in any 12-month period.</i> <i>This standard does not apply to modification of indigenous vegetation that is:</i> a. <i>3m either side of, or within, an existing formed road, stock crossing, or accessway;</i> b. <i>3m either side of a fence, or other lawfully established structure; or</i> c. <i>within 10m of an existing lawfully established residential unit.</i>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				d. <u>vegetation clearance of indigenous vegetation 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, are exempt from the above standards.</u> (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – NFL – Natural Features and Landscapes – Standards – NFL-S3	74	Oppose	Federated Farmers opposes standard NFL-S3 because rural production buildings and structures situated within rural areas should not be caught in resource consent process under a landscape management regime. To do so would result in inefficient and unnecessary costs and delays for little or no environmental benefit.	Federated Farmers seeks the following relief: (a) Amend policy NFL-S3 to read: 1. <i>Buildings and structures within an Outstanding Natural Features and Landscape must meet the following standards:</i> a. <i>the gross floor area of any building or structure on a site must not exceed 50m² per site</i> b. <i>the building or structure must not exceed one storey and must not exceed a maximum height of 5m;</i> c. <i>Maximum of one residential unit per a site;</i> d. <i>any roof cladding must be of matt finish in a natural range of browns, greens, and greys to complement the tones found in the natural surroundings, with the colour having a light reflectivity value (LRV) percentage between 5 and 25%; and</i> e. <i>cladding is limited to natural materials and/or recessive colours with light reflectivity value (LRV) of 35% or less</i> <u>Except that:</u> a. <u>This standard shall not apply to buildings and structures ancillary to rural production activities, such as fences and gates, storage barns, farm implement sheds, livestock shelters for mustering areas, dairy sheds, shearing/wool sheds, and herd homes.</u>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				(b) Any consequential amendments required as a result of the relief sought.
PA-Public Access				
Part 2 – District Wide Matters – Natural Environment Values – PA-Public Access – Objectives	75	Support in part	Federated Farmers supports objectives PA-O1 as currently proposed in the Combined District Plan. However, there is a need for an additional objective that provides recognition of private property rights as well as the impacts public access may also have on the amenity value of selected landscapes and areas. The landowners’ private property rights are a key area of focus which needs to be considered within this chapter.	Federated Farmers seeks the following relief: (a) Amend PA-O1 so that it reads: <i>Public access to and enjoyment of the coast, rivers, lakes and natural inland, wetlands and their margins is maintained and enhanced <u>where appropriate</u> and in a manner that:</i> <i>a. preserves their natural character, indigenous biodiversity, landscape, historic heritage, and cultural values; and</i> <i>b. minimises incompatibility of providing public access with adjoining activities.</i> (b) The addition of a new objective PA-O2 that reads as follows: <i><u>Practical and safe public access to and along the margins of lakes and rivers and the coastal environment is provided in a way that respects private property and does not result in adverse effects on natural character, landscape, indigenous biodiversity, historical heritage, or cultural values.</u></i> (c) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Natural Environment Values –	76	Oppose	This policy should read so that public access should be compatible with these existing lawfully established activities.	Federated Farmers seeks the following relief: (a) Amend PA-P2 so that it reads:

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
PA-Public Access – Policy – PA-P2				<i>Enable activities within the coast, rivers, lakes, and wetlands and their margins that do not restrict or prevent public access to, or adjacent to the coast and surface waterbodies.</i> <i>Ensure public access to or adjacent to the coast and surface waterbodies are compatible with existing lawfully established activities within the coast, rivers, lakes and wetlands and their margins.</i> (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters- Natural Environment Values – PA-Public Access – Policy – PA-P3	77	Support in part	Restrictions of public access to the Coastal Marine area are important to protect natural habitats, activities of cultural value to Māori and public health and safety. Policy 19(3) of the New Zealand Coastal Policy Statement 2010 lists circumstances where public access to the coastal marine area can be restricted. One of these includes exceptional circumstances sufficient to justify the restriction. Federated Farmers seeks that exceptional circumstances to justify the restriction should be included in PA-P3. Landowners, when negotiating public access over their private land, should have this avenue to justify restriction of public access over their land.	Federated Farmers seeks the following relief: (a) Amend PA-P3 so that it reads: <i>Ensure use, subdivision, and development of the coastal environment provides for, or enhances, public access <u>where appropriate</u> to and along the Coastal Marine Area. Access should only be restricted for the following reasons:</i> <i>a. to protect natural habitats;</i> <i>b. to protect sites and activities of cultural value to Māori</i> <i>c. to protect historic heritage features and areas; or</i> <i>d. to protect public health and safety <u>or</u></i> <i>e. <u>in exceptional circumstances sufficient to justify the restriction.</u></i> (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Natural	78	Support in part	The policy framework needs to include direction for private property when providing public access to ensure that public access does not cause	Federated Farmers seeks the following relief:

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Environment Values – PA-Public Access – Policies			damage or create security risks. As a group, farmers provide more public access across their private property than other landowners (such as residential or industrial). Farmers are familiar with the adverse effects that result from public access such as rubbish, weed incursions and nuisance effects on their homes and places of work.	(a) The addition of a new objective PA-P4 that reads as follows: <i>To provide information and education to the public regarding where public access is available, and that access over private land is only by the permission of the landowner.</i> (b) Any consequential amendments required as a result of the relief sought.
Subdivision				
SUB-Subdivision				
Part 2 – District Wide Matters – Subdivision - SUB-Subdivision – Objective – SUB-O1	79	Oppose	The purpose of subdivision is not to create lots for natural features and landscapes, waterbodies, indigenous biodiversity, historic heritage, or SASMs (also lots may end up encompassing some such areas). As a general objective, this objective is heavily ‘urban -centric’ and it either needs to be more generic, or it needs to include a range of other considerations besides merely urban ones, or special area overlays.	Federated Farmers seeks the following relief: (a) Amend SUB-O1 so that it reads: <i>Subdivision and developments create allotments and patterns of land use and development that:</i> a. Provide for the anticipated purpose, character, and amenity of each zone and the qualities and values of the site(s) including natural features and landscapes, waterbodies, indigenous biodiversity, historic heritage, and sites and areas of significance to Māori. b. Provide for a variety of housing types that cater for the range of community needs, such as affordability, accessibility, and lifestyle; c. Are well functioning, accessible, integrated and connected with adjoining neighbourhoods; d. Provide accessible and well designed open space areas;

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				e. Protect cultural, heritage, and natural values; and respond to the risks of natural hazards and is resilient to climate change (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Subdivision - SUB-Subdivision – Objective – SUB-O2	80	Oppose	Federated Farmers opposes the draft wording of Objective SUB-O2. We suggest wording that does not imply that ‘servicing’ is a ubiquitous requirement regardless of context.	Federated Farmers seeks the following relief: (a) Amend SUB-O2 so that it reads: <i>Subdivision and developments are serviced to provide for the likely or anticipated use of the land while avoiding, remedying, or mitigating adverse effects on the environment by ensuring:</i> <i>a. Subdivisions within the urban boundary connect to reticulated water and wastewater services (and reticulated stormwater services where they are available or provide for on-site stormwater disposal) with sufficient capacity to accommodate proposed or anticipated development; and</i> <i>b. Subdivisions in Rural Zones can be appropriately serviced via on-site measures.</i> (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Subdivision-	81	Oppose	Infrastructure will not always be available for all types of subdivision (e.g. for rural lot subdivision in remote rural areas), nor will it always be	Federated Farmers seeks the following relief:

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
SUB-Subdivision Policy – SUB-P2			appropriate to require all types of infrastructure for all types of subdivision.	(a) Amend SUB-P2 so that it reads: <i>Require subdivision to be located where appropriate infrastructure for new subdivision is available, or to provide infrastructure in an integrated and comprehensive manner by:</i> <i>a. ensuring appropriate infrastructure has the capacity to accommodate the development or anticipated future development of the land in accordance with the purpose of the zone, is in place at the time of subdivision or development and integrates with existing and planned infrastructure.</i> <i>b. Requiring connections to Council’s reticulated systems within the urban boundary to meet the performance criteria of the relevant Council;</i> <i>c. Ensuring allotments outside the urban boundary are of a sufficient size and shape where appropriate soil conditions to accommodate on-site wastewater, stormwater, and water supply infrastructure, and that there is sufficient water supply capacity for firefighting purposes;</i> <i>d. Ensuring roads and any vehicle access to sites meet minimum design standards to allow for safe and efficient traffic movements and can safely accommodate the intended number of users and the intended functioning of the road or access;</i> <i>e. Providing for transport network connections within and between communities;</i> <i>f. Where consistent with the zone, providing for a variety of travel modes that reflect the purpose, character, and</i>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				<i>amenity values of the zone, including walking, cycling, and access to public transport; and</i> <i>g. Achieving safe and efficient access onto and from state highways.</i> (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Subdivision - SUB-Subdivision – Policy – SUB-P5	82	Oppose	Federated Farmers opposes the proposed policy SUB-P5. Amenity values should not be a consideration for subdivision in rural areas, lest it be used as an excuse to impose unreasonable reverse sensitivity restrictions against primary production activities. Similarly, ‘predominance of vegetation’ and provision for ‘varying forms, scale and separation of structures associated with primary production activities’ are not relevant considerations for subdivision in rural areas.	Federated Farmers seeks the following relief: (a) Amend SUB-P5 so that it reads: <i>Provide for subdivision, use and development where it does not compromise the purpose, character, and amenity values of the General Rural Zone by:</i> a. Enabling and promoting openness and predominance of vegetation; <i>b. Enabling and promoting a productive working landscape</i> <i>c. Enabling primary production and ancillary activities;</i> d. Providing for varying forms, scale and separation of structures associated with primary production activities; <i>e. Managing the density and location of residential development;</i> <i>f. Ensuring allotments can be self-serviced;</i> <i>g. Retaining a clear delineation and contrast between the district’s rural areas and urban areas; and</i>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				<i>h. Avoiding, remedying, or mitigating reverse sensitivity effects.</i> (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Subdivision - SUB-Subdivision – Rules – SUB-R1	83	Support	Federated Farmers supports boundary adjustments enabled as a controlled activity, because this allows rural landowners to efficiently reallocate ownership of farmland, according to changing circumstances and as no additional lots are being created in boundary adjustments, the overall intensity of land ownership and the cumulative effects of transport networks and services remains unchanged. Therefore, effects of boundary adjustments are minor.	Federated Farmers seek the following relief: (a) The retention of rule SUB-R1 as currently proposed (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – Subdivision - SUB-Subdivision – Rules – SUB-R5	84	Oppose	Federated Farmers opposes rule SUB-R5. A farmer should not be forced to dispose of 40ha if they only need to dispose of 20ha. The requirement for ‘no vacant lots to be created’ is non-sensical in a rural setting. It is highly efficient for new lots to be vacant so that they can be put to maximum productive potential. Direct access to state highways should not be intensified as a result of new subdivision. However, where an existing access is from a state highway, the effects of that are the same or similar as prior to subdivision and therefore the use of such existing access should be permitted to continue.	Federated Farmers seek the following relief: (a) Amend SUB-R5 so that it reads: 1. Activity Status: Controlled <i>Where:</i> <i>a. There is no more than one additional allotment created;</i> <i>b. The subdivision is of land around an existing lawfully established residential unit</i> <i>c. The additional allotment is no less than 0.5ha</i> <i>d. The balance area remaining from the record of title subject to subdivision is no less than 40ha 20ha;</i> <i>e. No vacant allotments are created following the subdivision</i> <i>f. Compliance is achieved with:</i> <i>i. SUB-S1</i>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				ii. SUB-S2 iii. SUB-S3 iv. SUB-S4 v. SUB-S5 vi. SUB-S6 vii. SUB-S7 viii. SUB-S8 ix. SUB-S9 g. The subdivision complies with or does not increase any existing or previously approved non-compliance with the underlying zone standards: h. There is no <u>new</u> direct access to State Highway 53, any Limited Access Road direct access to State Highway 2. i. There is no <u>new</u> direct access to State highway 2 (b) Any consequential amendments required as a result of the relief sought
Part 2 – District Wide Matters – Subdivision SUB-Subdivision – Rule – SUB-12	85	Support in part	Federated Farmers supports the restricted discretionary status for subdivision within the coastal environment. Federated Farmers does not support the minimum allotment size of 40ha. A farmer should not have to dispose of 40ha if they only need to dispose 20ha. For subdivision in proximity to existing subdivided and developed land at Cape Palliser, Castlepoint, Flat Point, Mataikona, Ngawai, Otahome, Riversdale and Whangaimoana, there should be recognition that cumulative effects of further subdivision within the coastal environment are less likely to present problems. In these areas, allowing further appropriate subdivision could strengthen isolated rural communities and there should be a matter of discretion to consider the merits of this.	Federated Farmers seeks the following relief: (a) Amend SUB-R12 so that it reads: 1. Activity Status: Restricted Discretionary Where: a. a proposed building platform is identified for each proposed allotment that is capable of accommodating a building that complies with the permitted activity standards of the underlying zone;

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				b. A building platform is not located in an area of Outstanding Natural Character, Very High and High natural Character, or Foreshore Protection Area; and c. Any allotments created have minimum allotment size of 40ha <u>20ha</u> Matters of discretion: ... <u>8. the extent to which appropriate subdivision could strengthen isolated rural communities where cumulative effects of further subdivision and development within the coastal environment will be minor due to proximity to existing subdivided and developed land at cape Palliser, Castlepoint, Flat Point, Mataikona, Ngawi, Otahome, Riversdale and Whangaimoana.</u> (b) Any consequential amendments required as a result of relief sought.
Part 2 – District Wide Matters – Subdivision SUB-Subdivision – SUB-Table 1	86	Oppose	Federated Farmers considers that 40ha is too large an area for efficient rural property management. A farmer should not have to dispose of 40ha if they only need to dispose 20ha.	Federated Farmers seeks the following relief: (a) Amend SUB-Table 1 GRUZ: General Rural Zone 40ha <u>20ha</u> (b) Any consequential amendments required as a result of the relief sought.
FC-Financial Contributions				
Part 2 – District Wide Matters – Subdivision - FC-Financial	87	Support	Federated Farmers supports the overall intent of the FC- Financial Contributions Chapter. Placing responsibility on developers and subdividers to fund infrastructure upgrades and community facilities needed to service growth is an equitable policy. We also endorse	Federated Farmers seeks the following relief:

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Contributions – Entire Chapter			flexibility into the policy to waive or reduce contributions where pursuing full cost recovery would not serve the wider community interest or would be unfair. This is important for situations like a farmer subdividing off a small section for retirement or to release some necessary capital. Setting reasonable caps on reserve and transport contributions per allotment and allowing annual adjustments of district wide infrastructure contributions should held avoid disincentivising appropriate growth.	(a) The retention of the FC-Financial Contributions chapter as currently proposed. (b) Any consequential amendments required as a result of the relief sought.
General District Wide Matters				
CE- Coastal Environment				
Part 2 – District Wide Matters – General District Wide Matters – CE-Coastal Environment – Objective – CE-O1	88	Support in part	The New Zealand Coastal Policy Statement (NZCPS) requires recognition of the characteristics and qualities that contribute to natural character of the coastal environment and protection of those from inappropriate subdivision, use and development while encouraging restoration of the coastal environment. There is no requirement to ‘enhance’ such characteristics, therefore this should not be a goal of the Combined District Plan.	Federated Farmers seeks the following relief: (a) Amend CE-O1 so that it reads: <i>The qualities that contribute to the coastal environment including natural character, landscape, historic, cultural and ecological values are maintained and, where appropriate, restored or enhanced.</i> (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – General District Wide Matters – CE-Coastal Environment – Objective – CE-O2	89	Support in part	The New Zealand Coastal Policy Statement (NZCPS) requires recognition of the characteristics and qualities that contribute to natural character of the coastal environment and protection of those from inappropriate subdivision, use and development while encouraging restoration of the coastal environment. There is no requirement to ‘enhance’ such characteristics, therefore this should not be a goal of the Combined District Plan.	Federated Farmers seeks the following relief: (a) Amend CE-O2 so that it reads: <i>The natural character of the coastal environment is preserved, including:</i> <i>Protecting the qualities, characteristics and values of areas of Outstanding Natural Character and Very High and High Natural Character in the landward extent of the coastal environment; and</i>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				2. Maintaining and where appropriate enhancing <u>restoring</u> natural character in all other areas of the coastal environment. (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – General District Wide Matters – CE-Coastal Environment – Objective – CE-O5	90	Support in part	Federated Farmers has concerns that the objectives and policies do not recognise and provide for: - the functional need of certain activities to be in areas where the resource is located; and - existing lawfully established activities to continue to operate. it is important that there is a framework that allows for the on-going operations of farms which means it needs to be specifically spelt out in relevant objectives and policies. There also needs to be recognition and provision for activities with a functional need to be able to locate in coastal hazard areas.	Federated Farmers seeks the following relief: (a) Amend CE-O5 so that it reads: <i>People and communities are able to provide for their social, economic and cultural well-being, recognising that the protection of natural character and indigenous biodiversity, public access, or cultural values does not preclude subdivision, use or development, where this does not compromise these values. <u>Existing lawfully established activities can continue to operate and that the functional need of certain activities to be in areas where the resource is located is recognised and provided for.</u></i> (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – General District Wide Matters – CE-Coastal Environment – Policy – CE-P1	91	Support	Identifying the extent of the coastal environment is important to our members whose farms may form part of the coastal environment. Land identified as part of the coastal environment is subject to objectives, policies, and rules for the purpose of recognising and providing for the preservation of the natural character of the coastal environment. We support CE-P1 and the characteristics upon which the extent of the coastal environment is identified. These are consistent with Policy 1 of the New Zealand Coastal Policy Statement 2010. We support planning	Federated Farmers seeks the following relief: (a) Retain CE-P1 as proposed. (b) Any consequential amendments required as a result of the relief sought.

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
			maps to clearly depict to stakeholders the extent of the coastal environment.	
Part 2 – District Wide Matters – General District Wide Matters – CE-Coastal Environment – Policy – CE-P4	92	Support in part	Our members may own or use land that forms part of the coastal environment. Existing agricultural activities may be managed by this policy. We are concerned with the methods in this policy to ensure that the form, scale, and nature of the activity will not detract from the natural character of the coastal environment. We are particularly concerned with maintaining and enhancing public access. Public access can and does occur over private property. This raises issues of security and safety for private landowners. Farmers have and still are experiencing public access users leaving gates open and/or straying off the public access paths. A balance needs to be obtained so that private landowners, particularly in rural environments are not adversely impacted on by members of the public and other parties seeking access. Any policy that seeks to maintain and enhance public access needs to recognise that public access does occur over private land and the adverse effects that may result need to be addressed. Council also needs to consider how access to the sites can be controlled so that private landowners are still able to continue with their existing and lawfully established activities and operations.	Federated Farmers seeks the following relief: (a) Amend CE-P4 so that it reads: <i>Manage subdivision, use and development within the coastal environment to ensure:</i> <i>a. there is a functional need or operational need for the activity to be located in the coastal environment; and</i> <i>b. The form, scale and nature of the activity will not detract from the natural character of the coastal environment by:</i> ... <u><i>Vi. maintaining and enhancing public access while also ensuring that adverse effects on private land are minimised, maintaining customary access and recreational use.</i></u> ... (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – General District Wide Matters – CE-Coastal Environment – Standards – CE-S1	93	Oppose	The Standards in this rule are urban centric, overly restrictive, and not appropriate for the full range of rural production activities within the wide-open spaces of the rural areas, where considerably more latitude for development and earthworks can be tolerated without having adverse effects on the environment. CE-S1 as proposed risks capturing routine farm activities in a resource consent process resulting in onerous costs and delays for little or no environmental benefit. Therefore, more exceptions for rural earthworks are warranted.	Federated Farmers seeks the following relief: (a) Amend CE-S1 so that it reads: <i>1. Earthworks within the coastal environment must not exceed:</i> <i>a. A maximum cut or fill height greater than 3m above ground level; and</i> <i>b. A maximum area of 500m2 per site.</i>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				2. Earthworks within areas of very high and high natural character must not exceed: a. a maximum cut or fill height of 1.5m above ground level and b. A maximum area of 50m² per site. <i>This Standard does not apply to:</i> a. Earthworks associated with maintaining existing farm tracks, water supply infrastructure, <u>farm water supply dams, farm drains, livestock mustering yards, farm vehicle hard stand areas, airstrips, sileage pits, fence lines and access ways</u> are exempt from the above area standards but must comply with NFL-S1(1)(a) and NFL-S1(2)(a). (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – General District Wide Matters – CE-Coastal Environment – Standards – CE-S2	94	Oppose	The Standards in this rule are urban centric, overly restrictive, and not appropriate for the full range of rural production activities within the wide-open spaces of the rural areas, where considerably more latitude for development and clearance of indigenous vegetation can be tolerated without having adverse effects on the environment. CE-S2 as proposed risks capturing routine farm activities in a resource consent process resulting in onerous costs and delays for little or no environmental benefit. Therefore, more exceptions for rural indigenous vegetation clearance are warranted.	Federated Farmers seeks the following relief: (a) Amend CE-S2 so that it reads: <i>Modification of indigenous vegetation must not exceed, in total area, 50m² in any 12month period.</i> <i>This standard does not apply to modification of indigenous vegetation that is:</i> a. 3m either side of, or within, an existing formed road, track, stock crossing or accessway; b. 3m either dies of a fence, or other lawfully established structure; or

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				<i>c. Within 10m of an existing lawfully established residential unit.</i> <u>Except that:</u> <i>a. <u>Vegetation clearance of indigenous vegetation associated with the maintenance of pasture, existing farm tracks, farm water supply pipelines, 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.</u></i> (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – General District Wide Matters – CE-Coastal Environment – Standards – CE-S3	95	Oppose	The Standards in this rule are urban centric, overly restrictive, and not appropriate for the full range of rural production buildings and structures within the wide-open spaces of the rural areas, where considerably more latitude for development can be tolerated without having adverse effects on the environment. CE-S3 as proposed risks capturing routine farm buildings and structures in a resource consent process resulting in onerous costs and delays for little or no environmental benefit. Therefore, more exceptions for rural production buildings are warranted.	Federated Farmers seeks the following relief: (a) Amend CE-S3 so that it reads: <i>1. Buildings and structures within the coastal environment must meet the following building standards:</i> <i>a. the gross floor area of any individual building or structure on a site must not exceed 200m²;</i> <i>b. The building or structure must not exceed a maximum height of 7m;</i> <i>c. Maximum of one residential unit per site;</i> <i>d. Any roof cladding must be of matt finish in a natural range of browns, greens, and greys to complement the tones found in the natural surroundings, with the colour</i>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				having a light reflectivity value (LRV) percentage between 5 and 25% and e. Cladding is limited to natural materials and/or recessive colours with light reflectivity value (LRV) of 35% or less. 2. Buildings and structures within the Foreshore Protection Area must meet the following standards: a. the gross floor area of the building or structure on a site must not exceed 15m²; b. The building or structure must not exceed a maximum height of 3m and; c. The building or structure must only be used for non-habitable purposes. 3. Buildings and structures within an area identified as Very High and High Natural Character and Landscape must meet the following standards: a. the gross floor area of the building or structure on a site must not exceed 50m²; b. The building or structure must not exceed a maximum height of 5m. Standard CE-S3(1) does not apply to the Settlement Zone <u>Except that:</u> <u>Buildings or structures associated with rural production activity, such as fences and gates, storage barns, farm implement sheds, livestock shelters for mustering areas, dairy sheds, shearing/wool sheds, and herd homes are exempt from the above standards.</u> (b) any consequential amendments required as a result of the relief sought.

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
LIGHT-Light				
Part 2 – District Wide Matters- General District Wide Matters - LIGHT-Light – Policies	96	Support	Federated Farmers supports LIGHT-P3 and LIGHT-P4. These policies sufficiently provide for use of light to aid primary production activities that occur early in the morning and late at night. Use of artificial light is also important to our members for security purposes	Federated Farmers seeks the following relief: (a) Retain LIGHT-Light chapter as proposed. (b) Any consequential amendments required as a result of the relief sought.
NOISE – Noise				
Part 2 – District Wide Matters – General District Wide Matters – NOISE-Noise – Objective – NOISE-O2	97	Support	Federated Farmers supports this objective.	Federated Farmers seeks the following relief: (c) Retain NOISE-O2 as proposed. (d) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – General District Wide Matters – NOISE-Noise – Policy – NOISE-P1	98	Support	The management of noise should reflect the predominant land use within each zone. It would be perverse for rural production activities that are characteristically noisy, such as operation of frost fans or bird-scaring devices, to be prevented from occurring in rural areas on account of the sensitivity of nearby rural residential land uses that have chosen to live in remote rural areas.	Federated Farmers seeks the following relief: (a) Amend NOISE-P1 so that it reads: <i>Enable the generation of noise from activities that:</i> <i>1. maintain the predominant <u>land-use</u> character and amenity values of the receiving environment by <u>appropriately</u> controlling the types of activities and the levels of noise permitted in each zone; and</i> <i>2. Does not compromise the health, safety and wellbeing of people and communities.</i> (b) Any consequential amendments required as a result of the relief sought.

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Part 2 – District Wide Matters – General District Wide Matters – NOISE-Noise – Policy – NOISE-P2	99		The management of noise should reflect the predominant land use within each zone. It would be perverse for rural production activities that are characteristically noisy, such as operation of frost fans or bird-scaring devices, to be prevented from occurring in rural areas on account of the sensitivity of nearby rural residential land uses that have chosen to live in remote rural areas.	Federated Farmers seeks the following relief: (a) Amend NOISE-P2 so that it reads: <i>Provide for other activities that generate noise, where these avoid, remedy, or mitigate any adverse effects, having regard to:</i> <i>1. the extent to which it avoids conflict with existing noise sensitive activities;</i> <i>2. whether the level of effects is compatible with the character and amenity of the location and adjacent established activities and their operation;</i> <i>3. 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;</i> <i>4. the degree to which the noise breaches the permitted noise standards for the receiving zone(s).</i> <i>5. 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> <i>6. the frequency, intensity, duration, and offensiveness of the noise generated;</i> <i>7. any adverse effects on the health, safety and wellbeing of people and communities within the surrounding area, including sleep disturbance and annoyance.</i> <i>8. whether the activity adopts the best practicable option to avoid, remedy, or mitigate adverse effects and the appropriateness of potential mitigation measures to control and monitor the noise levels in addition or as</i>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				<i>alternatives to the best practicable option through noise management plans or other methods; and</i> 9. <i>potential positive effects associated with the activity.</i> (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – General District Wide Matters – NOISE-Noise – Policy – NOISE-P8	100	Support	Federated Farmers supports NOISE-P8.	Federated Farmers seeks the following relief: (a) Retain NOISE-P8 as notified. (b) Any consequential amendments required as a result of the relief sought.
Part 2 – District Wide Matters – General District Wide Matters – NOISE-Noise – Rules	101	Support	Federated Farmers support the list of activities that are not subject to the rules and standards in the NOISE – Noise Chapter. We particularly support d where Council has included agricultural aviation and helicopter landing areas.	Federated Farmers seeks the following relief: (a) Retain the list of activities that are not subject to the rules and standards in the NOISE-Noise Chapter as proposed. (b) Any consequential amendments required as a result of the relief sought.
Part 3 Area specific Matters				
Residential Zone				
GRZ- General Residential Zone				
Part 3 – Area Specific Matters – General Residential Zone – GRZ- General Residential Zone – Entire Chapter	102	Support in part	Overall, the chapter appears reasonably balanced. While Federated Farmers supports the general intent, we want to ensure rural character and productive values on the fringe of residential and rural zones are appropriately recognised and protected.	Federated Farmers seeks the following relief: (a) Insert a new objective GRZ-OX that reads: <i>Avoid reverse sensitivity effects on lawfully established rural activities where residential development adjoins rural sites. Where residential development adjoins rural sites recognise and</i>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
			It is evident from the Combined District Plan map viewer that the General Residential Zone directly adjoins the General Rural Zone across a significant portion of the region, lacking a buffer zone in between. This raises the concern that the plan does not contain adequate provisions to manage reverse sensitivity effects, whereby residential activities within the urban area can affect the operation of adjoining rural activities. This could unduly constrain existing or future primary production when there is future development of the General residential Zone.	<u>provide for the consideration of effects on rural character, amenity, and operations.</u> (b) Any consequential amendments required as a result of the relief sought,
Rural Zones				
GRUZ- General Rural Zone				
Part 3 – Area Specific Matters – Rural Zones – GRUZ- General Rural Zone – Objective – GRUZ-O3	103	Support in part	Federated Farmers supports this objective however this objective should give effect to the National Policy Statement for Highly Productive land to ensure that it is the productive use of highly productive land and resources is supported.	Federated Farmers seeks the following relief: (a) Amend GRUZ-O3 so that it reads: <i>The <u>productive capacity of highly productive land and resources of the General Rural Zone is supported through enabling a range of primary production oriented and resource dependent activities that depend on the highly productive land resource, and avoiding activities that constrain productive capacity of highly productive land.</u></i> (b) Any consequential amendments required as a result of the relief sought,
Part 3 – Area Specific Matters – Rural Zone – GRUZ- General Rural Zone – Objective – GRUZ-O5	104	Support	Federated Farmers supports this objective. Primary production activities have a functional need to locate in the General Rural Zone and therefore should have priority protection from reverse sensitivity affects from sensitive activities.	Federated Farmers seeks the following relief: (a) Retain GRUZ-O5 as proposed. (b) Any consequential amendments required as a result of the relief sought.
Part 3 – Area Specific Matters – Rural Zone-	105	Support in part	Federated Farmers seeks a minor amendment to this Objective.	Federated Farmers seeks the following relief:

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
GRUZ – General Rural Zone – Objective – GRUZ – O6				(a) Amend GRUZ-O6 so that it reads: <i>a. Rural lifestyle subdivision and development is managed in a way that avoids additional fragmentation of <u>highly productive land and its productive potential capacity.</u></i> <i>b. Opportunities for rural lifestyle subdivision and development in appropriate locations within the General rural Zone is provided for, insofar as GRUZ-O6(a) is met.</i> (b) Any consequential amendments required as a result of the relief sought.
Part 3 – Area Specific Matters- Rural Zone – GRUZ – General Rural Zone – Policy – GRUZ-P1	106	Support in part	This policy needs to reflect the National Policy Statement for Highly Productive Land (NPS-HPL). There needs to be a strong emphasis on enabling primary production activities that rely on the Highly Productive Land resource, and a strong and direct emphasis on avoiding rural lifestyle development on such land.	Federated Farmers seeks the following relief: (a) Amend GRUZ-P1 so that it reads: <i>a. Enable primary production activities <u>and ancillary activities</u> that are compatible with the purpose, character, and amenity values of the General Rural Zone <u>productive capacity of Highly Productive Land</u>;</i> <i>b. Provide for allow, 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.</i> <i>c. Provide for Avoid rural lifestyle <u>subdivision and development of Highly Productive Land</u> in appropriate</i>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				locations where GRUZ-P1(a) and GRUZ-P1(b) are enabled or provided for. (b) Any consequential amendments required as a result of the relief sought
Part 3 – Area Specific Matters – Rural Zone – GRUZ- General Rural Zone – Policy – GRUZ-P3	107	Support in part	This policy needs to reflect the National Policy Statement for Highly Productive Land. ‘Promoting openness and predominance of vegetation’ is unnecessarily constraining on productive use of Highly Productive Land and should not be a policy requirement. There needs to be a strong emphasis on enabling primary production activities that rely on the Highly Productive Land resource, and a strong and direct emphasis on avoiding rural lifestyle development on such land.	Federated Farmers seeks the following relief: (a) Amend GRUZ-P3 so that it reads: <i>Provide for subdivision, use, and development where it does not compromise the purpose, character, and amenity of the General Rural Zone, by:</i> a. Enabling and promoting openness and predominance of vegetation; <i>b. Enabling and promoting a productive working landscape</i> <i>c. Enabling primary production and ancillary activities;</i> <i>d. Providing for varying forms, scale, and separation of structures associated with primary production activities;</i> e. Managing the density and location of avoiding residential development that does not have a functional need to locate in the General Rural Zone; <i>f. Ensuring allotments can be self-serviced;</i> <i>g. Retaining a clear delineation and contrast between the Wairarapa’s rural areas and urban areas; and</i>

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
				<i>h. Avoiding, remedying, or mitigating reverse sensitivity effects on <u>primary production activities</u>.</i> (b) Any consequential amendments required as a result of the relief sought.
Part 3 – Area Specific Matters – Rural Zone – GRUZ – General Rural Zone – Policy – GRUZ-P4	108	Support in part	This policy needs to give effect to the National Policy Statement for Highly Productive Land (NPS-HPL)	Federated Farmers seeks the following relief: (a) Amend GRUZ-P4 so that it reads: <i>Avoid subdivision in the General Rural Zone that will result in sites that are of a size, scale, or location that is contrary to <u>enabling productive use of Highly Productive Land and the anticipated purpose, character, and amenity values of the zone, by:</u></i> <i>a. Limiting small lot subdivision within the General Rural Zone to areas where there is <u>no Highly Productive Land, or limited productive potential and where it does not compromise the use of land for primary production activities; and</u></i> <i>b. Recognising <u>avoiding</u> the cumulative effects associated with small lot subdivision on the productive use and potential of <u>Highly Productive Land</u> within the General Rural Zone.</i> (b) Any consequential amendments required as a result of the relief sought.
Part 3 – Area specific Matters – Rural Zone –	109	Support	Federated Farmers supports GRUZ-R6 which permits agricultural aviation in the General Rural Zone.	Federated Farmers seeks the following relief:

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
GRUZ- General Rural Zone – Rule – GRUZ-R6				(a) Retain GRUZ-R6 (b) Any consequential amendments required as a result of the relief sought.
Part 3 – Area Specific Matters – Rural Zone – General Rural Zone – Standard – GRUZ-S4	110	Support	Federated Farmers supports that this standard does not apply to buildings used for seasonal worker accommodation. It is important that for very large sites, particularly sheep farms in remote hill country areas to have additional seasonal worker accommodation.	Federated Farmers seeks the following relief: (a) Retain GRUZ-S4 as proposed. (b) Any consequential amendments required as a result of the relief sought.
Commercial and Mixed Use Zones				
MUZ- Mixed Use Zone				
Part 3 – Area Specific Matters – Commercial and Mixed Use Zones - MUZ- Mixed Use Zone – Entire Chapter	111	Support	Federated Farmers supports policies and rules in this chapter that have the effect of minimising adverse effects of the Mixed Use Zone and activities in it on adjacent rural land.	Federated Farmers seeks the following relief: (a) Retain the MUZ-Mixed Use Zone chapter as proposed. (b) Any consequential amendments required as a result of the relief sought.
Industrial Zones				
GIZ- General Industrial Zone				
Part 3 – Area specific Matters – Industrial Zones – GIZ – General Industrial Zone – Objective – GIZ-O2	112	Support	Federated Farmers supports objective GIZ-O2 which recognises the importance of maintaining amenity values of areas adjacent to the General Industrial Zone. This contributes to amenity protections at the rural-industrial interface by requiring visual screening and planting to mitigate potential impacts on adjoining rural zones. We consider it appropriate that industrial visual effects are internalised, and rural character is preserved across zone boundaries.	Federated Farmers seeks the following relief: (a) Retain objective GIZ-O2 as proposed. (b) Any consequential amendments required as a result of the relief sought.
Part 3 – Area specific Matters – Industrial Zones – GIZ – General	113	Support	Federated Farmers supports policy GIZ-P4 which serves to minimise adverse effects from industrial activities on other zones, including rural areas. Specifically, we endorse the requirements to:	Federated Farmers seeks the following relief: (a) Retain policy GIS-P4 as proposed.

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Industrial Zone – Policy – GIZ-P4			- Screen industrial activities where adjoining rural zones - Landscape boundaries in the Waingawa Industrial Area that interface with rural sites - Screen outdoor storage and service areas visible from public roads or rural land These mechanisms will help to internalise effects within industrial zones and avoid encroachment of nuisance effects such as noise, dust, and visual clutter into rural environments. Managing these potential impacts on rural amenity and character is vital to prevent reverse sensitivity risks constraining primary production activities. We consider GIZ-P4 takes appropriate steps to resolve interface issues with rural land and should be retained as proposed. The policy has potential to be strengthened further through consistent standards specific to the rural boundary.	(b) Any consequential amendments required as a result of the relief sought.
Part 3 – Area Specific Matters – Industrial Zones – GIZ – General Industrial Zone – Policy – New Policy – GIZ-PX	114	Support	Federated Farmers is concerned the General Industrial Zone Chapter does not contain adequate provisions to manage reverse sensitivity effects on established rural production activities where zones interface. Permitted activities and relatively permissive standards could allow effects such as noise, odour, and light spill to extend into rural areas. This could unduly constrain existing or future primary production activities on the fringes of industrial areas. Rural land can provide important opportunities for food production, agricultural processing and other complementary activities that support the local economy.	Federated Farmers seeks the following relief: (a) Insert a new policy GIR-PX that reads: <u>GIZ-PX Reverse Sensitivity: Protect lawfully established rural production activities from reverse sensitivity effects by requiring industrial sites adjoining any Rural Zone to mitigate adverse noise, odour, shading, glare, and other effects to the extent they extend beyond the site;</u> (b) Any consequential amendments required as a result of the relief sought.
Special Purpose Zone				
FUZ-Future Urban Zone				

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Part 3 – Area specific Matters – Special Purpose Zone – FUZ – Future Urban Zone – Objectives	115	Support	Federated Farmers supports the FUZ- Future Urban Zone Objectives to enable existing rural uses while restricting urban development until areas are comprehensively planned and rezoned.	Federated Farmers seeks the following relief: (a) Retain FUZ-Objectives as proposed; and (b) Any consequential amendments required as a result of the relief sought.
Part 3 – Area Specific Matters – Special Purpose Zone – FUZ- Future Urban Zone – Policies	116	Support	Federated Farmers supports the overall policy framework of the Future Urban Zone Chapter. The Policies clearly enable ongoing rural production activities while restricting urban development that would counter the policies of General Rural Zone, as well as FUZ-P2 and FUZ-P3 managing and avoiding incompatible activities	Federated Farmers seeks the following relief: (a) Retain policies as proposed and (c) Any consequential amendments required as a result of the relief sought.
Māori Purpose Zone				
Part 3 – Area Specific Matters – Special Purpose Zone – MPZ – Māori Purpose Zone – MPZ-P2	117	Support in part	Federated Farmers supports the intent of MPZ-P2 but would like to see consideration given to potential reverse sensitivity effects on lawfully established adjoining rural activities.	Federated Farmers seeks the following relief: (a) Amend MPZ-P2 so that it reads: <i>any potential conflict between activities within the zone or at zone interfaces, <u>including reverse sensitivity effects on the operations of activities in adjoining rural zones</u>, can be avoided, remedied, or mitigated;</i> (b) Any consequential amendments required as a result of the relief sought.
Part 4 –Appendices and Schedules				
Schedules				

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Part 4- Appendices and Schedules – Schedules – SCHED4 – Sites and Areas of Significance to Māori	118	Oppose	We note that the Combined District Plan carries over the existing schedule of Sites and Areas of Significance to Māori from the Operative Wairarapa Combined District Plan. Federated Farmers position is that sites and areas of significance to Māori that are located on, or form part of private land are not included in SCHED-4 unless the landowner(s) have agreed.	Federated Farmers the following relief: (a) Delete any site on private land where landowner(s) agreement has not been reached to include it in SCHEDULE 4 – Sites and Areas of Significance to Māori. (b) Any consequential amendments required as a result of the relief sought.
Part 4- Appendices and Schedules – Schedules – SCHED- 5, SCHED - 6, SCHED- 7, SCHED- 9, SCHED - 10	119	Oppose	Federated Farmers’ position is that only sites where landowner(s) agreement has been reached, should be included in SCHED-5, SCHED-6, SCHED-7, SCHED-9 and SCHED-10. If the Councils wish to negotiate scheduling significant natural areas, recommended areas for protection, Outstanding Natural Landscape and Features, Outstanding Natural Character Areas and Very High and High Natural Character Areas, on private land in the Combined District Plan, then the Councils are free to negotiate with landowner(s) to do so. The Combined District Plan should not be used as a mechanism to circumvent negotiation and agreement with private landowners.	Federated Farmers seeks the following relief: (a) Delete sites identified in SCHED-5, SCHED-6, SCHED-7, SCHED-9 and SCHED-10 that are on or form part of private land where landowner(s) agreement has not been reached. (b) Any consequential amendments required as a result of the relief sought.
Part 4 – Appendices and Schedules – SCHEDULE8 – Schedule of Significant Amenity Landscapes	120	Oppose	Federated Farmers seeks that this schedule be deleted from the Combined District Plan. It serves no practical purpose.	Federated Farmers seeks the following relief: (a) Delete SCHEDULE8 – Schedule of Significant Amenity Landscapes (b) Any consequential amendments required as a result of the relief sought.

