



Proposed Waitomo District Plan

Further submissions on behalf of Federated Farmers of New Zealand

26 July 2023



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12 September 2022

FURTHER SUBMISSION

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To: Waitomo District Council
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Further Submissions on: **Proposed Waitomo District Plan**

Date: 26 July 2023

Further Submissions by: Federated Farmers of New Zealand Inc

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1. INTRODUCTION

- 1.1 Federated Farmers welcomes the opportunity to provide further submissions on the Proposed Waitomo District Plan.
- 1.2 Federated Farmers of New Zealand (Inc) (**Federated Farmers**) has an interest in the Proposed Waitomo District Plan that is greater than the interest the general public has.
- 1.3 Federated Farmers is a primary sector organisation with a long and proud history of representing the needs and interests of New Zealand farmers involved in a range of rural businesses. We are a pan sector organisation that works with farmers to ensure practical and workable outcomes.
- 1.4 Federated Farmers aims to add value to its members' farming businesses. Its key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:
 - (a) our members may operate their business in a fair and flexible commercial environment;

- (b) our members' families and their staff have access to services essential to the needs of the rural community; and
 - (c) our members adopt responsible management and environmental practices.
- 1.5 Federated Farmers made submissions on the Proposed Waitomo District Plan and has been assigned the submitter number 46 as shown in the summary of submissions document on the Council's website.
 - 1.6 Section 2 contains the table that sets out Federated Farmers' further submissions in respect of submission points made by other parties on the Proposed Waitomo District Plan. The table also indicates whether Federated Farmers supports or opposes these primary submissions, the reasons for the position that it has taken, and the relief sought.
 - 1.7 Federated Farmers wishes to be heard in support of these further submissions. If others are making a similar submission, Federated Farmers will consider presenting a joint case with them at the hearing.
 - 1.8 Federated Farmers could not gain an advantage in trade competition through these further submissions.
 - 1.9 Federated Farmers can confirm that copies of this further submission have been served on the parties who made the original submission.

Dated: 26 July 2023



Tim House
Policy Advisor

2. FURTHER SUBMISSIONS TO THE PROPOSED WAITOMO DISTRICT PLAN

Submitter	Submission Number	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
New Zealand Helicopter Association	02.03	9. Definitions	The submitter seeks the removal of the definition for Farm Airstrips and Farm Helipads and the inclusion of a new definition for Helicopter Landing Areas.	Oppose	Federated Farmers seeks the retention of the current definition of Farm Airstrip and Farm Helipad which provides clear boundaries. This helps to mitigate the risk that farm airstrips and helipads would be utilised by helicopter movement or servicing for commercial purposes.	Decline the relief sought.
New Zealand Helicopter Association	02.04	9. Definitions	The submitter seeks the addition of a new definition for Helicopter Landing Area to broaden the areas in which helicopter activities can occur.	Oppose	The proposed definition should not replace the Farm Airstrip and Farm Helipad definition which is specific to the take-off and landing of Aircrafts for the purpose of servicing rural land.	Decline the relief sought.
New Zealand Helicopter Association	02.17	37. Noise	The submitter seeks to delete rule NOISE-R8 and opposes rules that restrict helicopter use for infrastructure security, infrastructure development and maintenance, utility networks, and improving natural areas for social well-being.	Support	NOISE-R8 should not apply to the general rural and rural production zones. The proposed rule will limit the flexibility and practicality of using helicopters for essential activities in rural areas.	Grant the relief sought or amend rule NOISE-R8 to exempt general rural and rural production zones.
New Zealand Helicopter Association	02.18	37. Noise	The submitter seeks an amendment to the noise exemptions and have intermittent and irregular helicopter activities included as an exemption to the noise rules.	Oppose	The relief sought lacks clarity and definition. The lack of specific criteria and guidelines for defining 'intermittent' and 'irregular' helicopter activities creates ambiguity and subjectivity. It opens the door for varying interpretations and potential misuse of the exemption.	Decline the relief sought.
Heritage New Zealand Pouhere Taonga	03.01	All of the plan Incentives and bonus provisions for heritage within the Plan	Subject to amendments sought elsewhere in this submission, the submitter seeks that the permitted activities related to schedules, the bonus lot subdivision rules and the subdivision provisions for the protection of scheduled items, are retained.	Support	Federated Farmers does not support all the amendments sought by the submitter elsewhere in the submission but does support the retention of the permitted activities related to schedules, the bonus lot subdivision rules and the subdivision provisions for the protection of scheduled items.	Grant the relief sought not including the amendments sought elsewhere in the submission.

Submitter	Submission Number	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Heritage Zealand Pouhere Taonga New	03.25	17. Energy	The submitter opposes the permitted activity approach to rule ENGY-R20 which allows up to 2 wind turbines per holding and seeks that such an activity is a restricted discretionary activity to better enable the management of effects on scheduled sites or features or the setting and surrounds.	Oppose	Restricting discretion in specific matters is sufficient to provide the protection sought by the submitter.	Decline the relief sought.
Heritage Zealand Pouhere Taonga New	03.53	19. Network utilities	The submitter partially supported rule NU-26 and the non-complying activity status for wastewater treatment and storage, excluding domestic scale septic tanks when located in outstanding natural features, heritage buildings and structures, sites and areas of significance to Māori and significant archaeological sites". The submitter sought the inclusion of domestic scale septic tanks in the rule.	Oppose	Federated Farmers considers the incorporation of domestic scale septic tanks within the rule is overly restrictive for landowners. There is insufficient justification to presume that domestic scale septic tanks would destroy the listed features, as indicated by the submitter and there is a low probability that septic tanks would be located in these areas in the first place.	Decline the relief sought.
Heritage Zealand Pouhere Taonga New	03.57	19. Network utilities	The submitter seeks that rule NU-R33 is amended from a restricted discretionary activity status to a discretionary activity status for earthworks in Sites and areas of significance to Māori and significant archaeological sites .	Oppose	Federated Farmers considers the restricted discretionary status of rule NU-R33 is appropriate and placing further restrictions on landowners is unwarranted and unnecessary.	Decline the relief sought.
Heritage Zealand Pouhere Taonga New	03.63	24. Historic Heritage	The submitter seeks to remove the word 'unduly' from policy HH-P4 stating that the use of the word dilutes the policy.	Oppose	The notified wording of the policy is seen by Federated Farmers as striking a balance between the rights and obligations of landowners while also ensuring continued and enhanced protection for heritage buildings and structures. The retention of the notified wording is sought.	Decline the relief sought.
Heritage Zealand Pouhere Taonga New	03.64	24. Historic Heritage	The submitter seeks to remove the word 'unduly' from policy HH-P5 stating that the use of the word dilutes the policy.	Oppose	Refer to reasons for submission point 03.63 above.	Decline the relief sought.

Submitter	Submission Number	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Heritage New Zealand Pouhere Taonga	03.76	24. Historic Heritage	The submitter opposes Policy HH-P17 and seeks the removal of the effects management hierarchy and clauses 1 – 5 of the policy. The submitter considers that this policy does not support the non-complying activity status that has been included in the activity table at HH-R16 for the destruction of an archaeological site.	Oppose	Federated Farmers considers that the current policy effectively balances resource use and protection, while also ensuring the Council's compliance with the Resource Management Act 1991. The submitter's concern about the 'destruction of a significant site' is addressed in the policy, which considers both on-site and adjoining activities. Activities neighbouring significant archaeological sites are unlikely to cause any site destruction.	Decline the relief sought.
Heritage New Zealand Pouhere Taonga	03.86	24. Historic Heritage	The submitter seeks to amend the permitted activity status of rule HH-R10 to restricted discretionary and proposes a case-by-case assessment of activities and new assessment criteria.	Oppose	Federated Farmers opposes the relief sought, the approach defined in the rules is consistent with Federated Farmers view that small, unobtrusive new or relocated buildings, as outlined in rule HH-R10(2), should be allowed within sites and surroundings of heritage buildings and structures.	Decline the relief sought.
Heritage New Zealand Pouhere Taonga	03.119	25. Sites and areas of significance to Māori	The submitter seeks that rule SASM-R6 is retained as a permitted activity subject to the following amendment: "Demolition or removal of structures <u>that do not require earthworks.</u> "	Oppose	Federated Farmers considers the proposed amendment overly restrictive and if the building is listed in Schedule 1 there are already appropriate restrictions that will be applied.	Decline the relief sought.
Heritage New Zealand Pouhere Taonga	03.120	25. Sites and areas of significance to Māori	The submitter seeks that the activities that are part of rule SASM-R7 are merged with rule SASM-R8 to be assessed as a restricted discretionary activity.	Oppose	The permitted status of the itemised activities within rule SAM-R7 are designated minor and include lawfully established activities necessary for day-to-day farming operations such as fence or track maintenance and the grazing of livestock.	Decline the relief sought.
Heritage New Zealand Pouhere Taonga	03.140	29. Subdivision	The submitter seeks that the subheading of policies SUB-P21 and Sub-P24 be changed to 'Natural Systems and Historic Heritage'	Oppose	Historic Heritage is already accounted for in the policies with reference to overlays, scheduled sites and features and archaeological sites.	Decline the relief sought.
Heritage New Zealand	03.145	29. Subdivision	The submitter supports the retention of rule SUB-R7 in particular clause (c) in the matters of discretion; 'Effects on any scheduled site or feature, archaeological	Oppose	Federated Farmers considers that the proposed wording in the matters of discretion in rule SUB-R7 (c) is too restrictive. Restricted discretion should be limited to areas of Significant	Decline the relief sought.

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Pouhere Taonga			site, water body or area of indigenous vegetation'		Indigenous Vegetation not merely areas of Indigenous Vegetation.	
Heritage New Zealand Pouhere Taonga	03.169	Schedule 4 - Sites and Areas of Significance to Māori -Wahi Tapu	The submitter is concerned that not all wahi tapu sites are included in Schedule 4 and would not be mapped correctly and subject to the associated rule framework. They seek the addition of several new sites in the schedule.	Oppose	The relief sought is not supported. Federated Farmers is concerned about the extent of obligations and restrictions the amendment could place on our members without further consultation occurring.	Decline the relief sought.
New Zealand Agricultural Aviation Association	04.01	9. Definitions	The submitter seeks the inclusion of a definition for Agricultural Aviation Activities in the district plan.	Support	The provision of an appropriate definition for aviation activities for agricultural purposes would be a useful definition to interpret the Farm Airstrips and Farm Helipad definition.	Grant the relief sought or with wording with similar effect.
New Zealand Agricultural Aviation Association	04.05	9. Definitions	The submitter seeks the inclusion of a definition for Rural Airstrips in the district plan.	Support	The provision of an appropriate definition for Rural Airstrips would clearly separate airstrips for agricultural purposes from commercial purposes.	Grant the relief sought.
New Zealand Agricultural Aviation Association	04.09	9. Definitions	The submitter seeks the inclusion of a new definition for lawfully established activities as the term is used throughout the plan particularly in reference to incompatible activities and a definition would help interpret the District Plan and reduce confusion.	Support	Federated Farmers New Zealand supports the inclusion of a definition for lawfully established activities to help interpret the plan as the definition will be useful especially in reference to incompatible activities and reverse sensitivities.	Grant the relief sought.
New Zealand Agricultural Aviation Association	04.10	9. Definitions	The submitter seeks the removal of the definition for Farm Airstrips and Farm Helipads and the inclusion of a new definition for Helicopter Landing Areas.	Oppose	Retaining the current definition of Farm Airstrip and Farm Helipad provides clear boundaries which mitigate the risk that farm airstrips and helipads would be utilised by helicopter movement or servicing for commercial purposes.	Decline the relief sought.
New Zealand Agricultural Aviation Association	04.11	16. Strategic direction, urban form and development	The submitter seeks the inclusion of a new Strategic Direction – Rural Environment. The rural area covers the bulk of Waitomo District but there is no strategic direction for the rural area.	Support	Federated Farmers support the inclusion of a new Strategic Direction for the rural environment as it is important that the chapter	Grant the relief sought.

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			Federated Farmers, in its submission, had sought the inclusion of an objective that provides recognition for farming and the importance of the rural environment for primary production and the district's economy.		recognises the importance of farming within the rural areas of the district.	
Tim Stokes	06.01	Schedule 6 - Significant natural areas	The submitter seeks the removal of R16UP040 as a Significant Natural Area from Schedule 6 of the Proposed District Plan. The submitter asked for all this area to be removed as it did not fit the definition of a locally significant area.	Support	Federated Farmers supports the removal of R16UP040 as a Significant Natural Area from Schedule 6 of the Proposed District Plan for the reasons outlined by the submitter.	Grant the relief sought.
Tim Stokes	06.02	Schedule 6 - Significant natural areas	The submitter seeks the removal of criteria number 5 from R16UP040.	Support	Federated Farmers supports the removal of criteria number 5 from R16UP040 for the reasons outlined by the submitter.	Grant the relief sought.
Tim Stokes	06.03	Planning Maps	The submitter seeks amendment to the northern boundary of R16U046.	Support	Federated Farmers supports the amendment to the northern boundary of R16U046 for the reasons outlined by the submitter.	Grant the relief sought.
Manulife Forest Management	08.15	26. Ecosystems and indigenous biodiversity	The submitter opposes Objective ECO-04 in the Ecosystems & Indigenous Biodiversity chapter in the Proposed District Plan and seeks the removal of the objective as it is inappropriate to require private landowners to enhance indigenous biodiversity outside of Significant Natural Areas.	Support	Federated Farmers New Zealand supports the submission. It is inappropriate to impose obligations on private landowners for biodiversity maintenance, enhancement, and restoration outside of Significant Natural Areas as this can severely impact on the ability of the landowner to use their land efficiently and effectively.	Grant the relief sought.
Manulife Forest Management	08.17	26. Ecosystems and indigenous biodiversity	The submitter opposes Policy ECO-P2.5 and considers it inappropriate to require landowners to enhance areas outside Significant Natural Areas.	Support	Federated Farmers New Zealand supports the submission. It is inappropriate to impose obligations on private landowners for biodiversity maintenance, enhancement, and restoration outside of Significant Natural Areas as this can severely impact on the ability of the	Grant the relief sought.

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					landowner to use their land efficiently and effectively.	
Manulife Forest Management	08.43	42. General rural zone	The submitter seeks the deletion of rule GRUZ-R17 in the General Rural Zone chapter of the Proposed District Plan. The submitter suggests that the proposed rule goes against the approach of the National Policy Statement for Highly Productive Land and arbitrarily prioritises some productive activities over production forestry.	Oppose	Federated Farmers feel that the rule appropriately balances the right for landowners to choose what to use their land for and protecting highly productive soils. Land use capability classes 4-7 is land that can be used for pastoral grazing and forestry. It is appropriate that land use change from agricultural, pastoral, or horticultural activities into forestry or plantation forestry is permitted. It is appropriate that land use conversion of the kind described in rule GRUZ-R17 for land use class 1-3 is restricted discretionary. Land use class 1-3 are suitable for multiple land use so are highly productive. Control on land use change through restricted discretionary activity is appropriate to protect highly productive land.	Decline the relief sought.
Waikato Regional Council	10.04	9. Definitions	The submitter seeks a new definition for 'upgrading' regarding a network utility. Currently the definition of 'maintenance' in the Proposed Plan specifically excludes upgrading.	Support	Network maintenance and upgrading affect farmers who have network utilities located on their land. It is important to clearly define the difference between maintenance and upgrading in respect of network utilities and that this is clear in the Proposed District Plan.	Grant the relief sought.
Waikato Regional Council	10.15	16. Strategic direction, urban form and development	The submitter seeks to amend the wording of Objective SD-O28 in the Strategic Direction – urban form and development chapter of the Plan, and replace the word minimise with avoid.	Support	Federated Farmers agrees that urban expansion onto highly productive land should be avoided.	Grant the relief sought.
Waikato Regional Council	10.67	23. Natural Hazards	The submitter seeks to amend rule NH-R7.2 so that it states that no hazardous materials may be stored in farm buildings without a floor or seeks the consideration	Support	Federated Farmers support this amendment providing that the plan clearly defines what a 'farm building without a floor' is and the term 'hazardous materials' is either replaced with 'hazardous substance' as defined in the	Grant relief sought by adding the rule into Chapter 22 with clearly defined terms.

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			to adding a rule in chapter 22 – hazardous substances to reflect this.		definitions, or ‘hazardous materials’ is defined in the Proposed District Plan itself. It is considered that the appropriate place for the rule is Chapter 22 – Hazardous Substances.	
Waikato Regional Council	10.73	26. Ecosystems and indigenous biodiversity	The submitter opposes the wording of Objective ECO-01 and seeks rewording of the objective that addresses biodiversity in a more holistic way by significantly broadening the scope.	Oppose	Federated Farmers considers that it is inappropriate to impose obligations on private landowners for biodiversity maintenance, enhancement, and restoration outside of Significant Natural Areas. The notified objectives give effect to Policy ECO-P1 of the Waikato Regional Policy Statement and meet the Council’s obligations with regards indigenous biodiversity both within and outside identified areas.	Decline the relief sought.
Waikato Regional Council	10.74	26. Ecosystems and indigenous biodiversity	The submitter opposes the wording in Objective ECO-O3 and suggests amendments which will raise the thresholds for permitted activities. The submitter also seeks that ‘significant natural areas’ is replaced by ‘indigenous biodiversity,’ to ensure that indigenous biodiversity outside of places identified as Significant Natural Areas are afforded the same protection.	Oppose	The proposed amendments result in an unnecessarily high threshold for the assessment of permitted activities. ‘No more than minor’ adequately balances effects on Significant Natural Areas with the cost of having to go through a resource consent process. Federated Farmers is also concerned with the proposed amendment to Indigenous biodiversity as it restricts the use of land that has not been identified as a Significant Natural Area.	Decline the relief sought.
Queen Elizabeth the Second National Trust	11.01	26. Ecosystems and indigenous biodiversity	<p>The submitter proposes two possible alternatives to the current wording of rule ECO-R2. One option is to retain the reference to QEII covenants but amend it to ensure that activities in accordance with QEII covenants are only permitted if they are for conservation activities.</p> <p>The other option put forward by the submitter is to remove the reference to QEII covenants from rule ECO-R2</p>	Oppose	The farming and rural communities of Waitomo have actively engaged in conservation efforts, including entering QEII covenants. These covenants provide a framework for landowners to work collaboratively with conservation organizations and government agencies to protect indigenous vegetation. By acknowledging and supporting activities in accordance with QEII covenants, rule ECO-R2 encourages and reinforces the positive	Decline the relief sought.

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			entirely, considering that rule ECO-R10 already covers activities likely to comply with the terms of QEII covenants.		conservation actions taken by landowners in the district. Retaining the reference to QEII covenants in rule ECO-R2 allows for flexibility and adaptive management approaches to conservation.	
New Zealand Pork Industry Board	14.01	9. Definitions	The submitter supports the definition of earthworks as per the national planning standards definition. The submitter also recommends the inclusion of a definition and associated rule structure to cover ancillary rural earthworks.	Support	Federated Farmers supports the notified definition of earthworks as well as the inclusion of a definition for Ancillary Rural Earthworks. The inclusion of a specific definition and rule structure for Ancillary Rural Earthworks will allow for the efficient management of potential biosecurity threats. This approach enables the agricultural industry to address biosecurity challenges quickly and efficiently while maintaining environmental sustainability.	Grant the relief sought.
New Zealand Pork Industry Board	14.04	9. Definitions	The submitter opposes the exclusion of campgrounds, community facilities, educational facilities and hospitals from the definition of Noise Sensitive Activities. These are activities which could give rise to reverse sensitivity effects when established in close proximity to primary production activities.	Support	Federated Farmers supports the relief sought the submitter for reasons outlined in their submission.	Grant the relief sought.
New Zealand Pork Industry Board	14.07	16. Strategic direction, urban form and development	The submitter seeks a new Strategic Direction, objectives and policies to outline the key strategic and significant resource management issues for the rural environments within the district.	Support	In its submission, Federated Farmers sought the inclusion of provisions in the chapter that recognised the importance that farming and rural areas played in the district. Not acknowledging or defining the key issues for the zone downplays the importance of the rural environments to the district economically and socially.	Grant the relief sought.

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Auckland / Waikato Fish and Game Council	18.05	26. Ecosystems and indigenous biodiversity	The submitter seeks an amendment to rule ECO-R4 to specify that the rule applies within 2m of a fence. Rule ECO-R4 refers to the permitted status of trimming, pruning or removal of indigenous vegetation for fencing-related activities but does not limit the distance from the fence where it applies.	Oppose	Federated Farmers New Zealand considers the notified Rule ECO-R4 strikes the appropriate balance between resource use and resource protection while ensuring Council meets its responsibilities under the Resource Management Act 1991. The proposed 2m threshold is not practicable and will increase maintenance costs as farmers would have to trim more regularly as vegetation grows back and puts strain on fence lines. Federated Farmers considers that the imposition of a 2m threshold for fencing is unduly prohibitive, given the inherent variability in each unique circumstance.	Decline the relief sought.
P F Olsen	19.10	9. Definitions	The submitter seeks an amendment to define 'Farm Airstrips and Farm Helipads' as 'Primary Production Airstrips and Helipads.' Farm airstrips and farm helipads are defined and include their use for forestry. Describing plantation forestry at a high level as 'farms' is misleading and inconsistent with the National Planning Standards.	Support	Federated Farmers supports the submission point based on the reasons outlined by the submitter.	Grant the relief sought.
P F Olsen	19.13	26. Ecosystems and indigenous biodiversity	The submitter seeks either an amendment or the deletion of Policy ECO-P9 claiming that the policy unfairly restricts one form of primary production over others.	Oppose	The relief sought is unnecessary considering the existence of policies and rules within the Proposed District Plan that effectively constrain alternative primary production activities pertaining to Significant Natural Areas.	Decline the relief sought.
P F Olsen	19.27	42. General Rural Zone	The submitter seeks the deletion or amendment to Rule GRUZ-R17 because plantation forestry has been singled out and unfairly regulated compared to other forms of primary production. The submitter contends that plantation forestry is not an irreversible land-change	Oppose	Federated Farmers believes that while transitioning to plantation forestry may not be an irreparable alteration of land use, it adversely affects soil quality and diminishes the land's overall productivity upon reversion. The purpose of the rules is to afford a certain level of safeguarding (via a regulated	Decline the relief sought.

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			use and seeks to amend the Rule to regulate subdivision, avoiding rezoning to rural lifestyle and restricting urban spread onto/of highly productive land.		Discretionary consenting process) for soil classes 1-3, which are recognized as highly productive. Allowing conversion to forestry would result in detrimental consequences for these soils. It is important to note that the mere reversibility of the change to forestry does not guarantee the soil will regain its former state of high productivity.	
Ballance Agri-Nutrients Limited	23.02	9. Definitions	The submitter seeks to have Agricultural Aviation activities defined in the plan.	Support	It is appropriate for the District Plan to clarify what activities are involved with Agricultural Aviation.	Grant the relief sought.
Ministry of Education	24.05	9. Definitions	The submitter seeks the inclusion of education facilities in the definition of Noise Sensitive Activities. Many of the activities that take place within an educational facility are sensitive to noise.	Support	Federated Farmers agree that the definition for Noise Sensitive Activities should include educational facilities so that it protects existing land use that may be incompatible with educational facilities.	Grant the relief sought.
Waitomo District Council	26.01	44. Rural Lifestyle Zone	The submitter seeks a new rule in the Rural Lifestyle Zone Rules to manage the keeping of animals to a level that is compatible with the amenity expectations of the zone.	Oppose	Federated Farmers represents many members who have rural lifestyle blocks of varying sizes. Adopting a uniform rule to govern animal keeping in the Rural Lifestyle Zone is an unsuitable approach. Implementing a blanket rule regarding the allowable number of animals on lifestyle blocks within the rural lifestyle zone would fail to account for the variations in land size, terrain, and carrying capacity across different properties. Such a one-size-fits-all approach would disregard the unique circumstances and constraints faced by landowners, potentially	Decline the relief sought.

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					<p>resulting in unreasonable restrictions on their agricultural activities.</p> <p>It is crucial to recognize the need for a flexible and scaled rule that considers the specific attributes of each rural lifestyle block, ensuring a fair and practical framework for animal management.</p>	
Horticulture New Zealand	27.10	9. Definitions	The submitter seeks the inclusion of education facilities and hospitals in a new definition of Sensitive Activities. Some of the activities that are excluded from the definition of noise sensitive activities can be sensitive to other effects.	Support	Federated Farmers values the importance of clear guidelines to address reverse sensitivity issues. By introducing a definition of Sensitive Activities and including educational facilities and hospitals, we can better protect farmland from reverse sensitivity issues resulting from incompatible activities locating nearby.	Grant the relief sought.
Horticulture New Zealand	27.23	9. Definitions	The submitter seeks a new definition for Highly Productive Land to be included in the Plan that is consistent with the National Policy Statement Highly Productive Land.	Support	Clearly defined terms increase clarity and help with the interpretation of the plan.	Grant the relief sought.
Horticulture New Zealand	27.25	9. Definition	The submitter seeks a new definition for Reverse Sensitivity to be included in the Plan that is consistent with the National Policy Statement Highly Productive Land.	Support	Reverse Sensitivity is an important issue for farmers. Having a defined concept provides a basis for decision-making and regulatory processes. It allows planners, authorities and District Plan users to consider the potential impacts of proposed developments on surrounding areas and take them into account during the assessment and approval processes. This promotes balanced and sustainable development by ensuring that the compatibility of activities is evaluated, and appropriate measures are implemented to address any potential adverse effects.	Grant the relief sought or with wording similar intent and effect.
Horticulture New Zealand	27.27	16. Strategic direction, urban	The submitter seeks a new Strategic Direction: Rural Environment to outline	Support	Federated Farmers supports the inclusion of a strategic direction for the rural environment of	Grant the relief sought.

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		from and development	the key strategic and significant resource management issues for the rural environments within the district. Not acknowledging or defining the key issues for the zone within the strategic objectives downplays the importance of the rural environments to the district.		the Waitomo that acknowledges and provides for the contribution the rural environment makes to the economic and social well-being of the district.	
Horticulture New Zealand	27.32	18. National electricity and gas transmission	The submitter opposes Policy NEG-T-P3 and seeks its deletion. The gas line already has the protection of easements or other legal instruments entered into with private landowners. It is not considered that district plan provisions are necessary.	Support	Federated Farmers opposes Policy NEG-T-P3 for the same reasons as the submitter. Gas companies have existing legal protection with the private landowners for ongoing access for maintenance, repair and upgrading works.	Grant the relief sought.
Transpower New Zealand Ltd	31.13	9. Definitions	The submitter seeks a new definition for Reverse Sensitivity to be included in the District Plan to assist with plan interpretation.	Support	Reverse Sensitivity is an important issue to farmers. A defined concept provides a basis for decision-making and regulatory processes. It allows planners, authorities and Plan users to consider the potential impacts of proposed developments on surrounding areas and take them into account during the assessment and approval processes. This promotes balanced and sustainable development by ensuring that the compatibility of activities is thoroughly evaluated, and appropriate measures are implemented to address any potential adverse effects.	Grant the relief sought or with wording with similar intent and effect.
Transpower New Zealand Ltd	31.29	18. National electricity and gas transmission	The submitter seeks to amend Rule NEG-T-R2 by inserting an explicit non-complying rule to make it clear that some activities are non-complying.	Oppose	The rule makes it clear that if the standards are not met for a permitted activity, then the activity will be classified as a non-complying activity. It is not necessary to insert a new rule as sought by the submitter.	Decline the relief sought.

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King Country Energy	33.18		The submitter seeks to amend ENGY-P7 to be consistent with the wording of Policy D of the National Policy Statement for Renewable Energy.	Support	Reverse Sensitivity is an important issue to farmers. Federated Farmers agrees with the submitter that the Policy should be amended so that it aligns with the National Policy Statement for Renewable Energy. However, the amendment sought by the submitter is only partially consistent with Policy D of the National Policy Statement for Renewable Energy.	Grant the relief sought to amend the policy to be consistent with Policy D of the National Policy Statement for Renewable Energy.
Kāinga Ora Homes and Communities	36.06	9. Definitions	The submitter opposes the definition of Noise Sensitive Activity and seeks the deletion of the definition in its entirety.	Oppose	It is appropriate that the District Plan defines what is considered to be a noise sensitive activity. This will assist in preventing reverse sensitivity issues from occurring from new incompatible activities which have been located near existing, lawfully established activities who may emit noise at a high level than in other areas.	Decline the relief sought.
First Gas Ltd	39.13	18. National Electricity and Gas Transmission	The submitter seeks an amendment to rule NEG-T-R5 Earthworks within 20m of the gas transmission network They want the setback distance from the gas transmission network to go from 20m to 10m.	Support	Federated Farmers supports the reduction of the setback for earthworks within 20m of a gas transmission network. Federated Farmers wants earthworks setbacks to be consistent with existing easement agreements.	Grant the relief sought.
Ventus Energy	42.19	42. General rural zone	The submitter seeks an amendment to Objective GRUZ-O3 that would recognise that land use changes over time as economic opportunities and priorities change.	Support	The submitter has raised a valid point. It is important that it is recognised that land use changes can and will occur as time and innovation move on.	Grant the relief sought.
Royal Forest and Bird Protection	47.04	9. Definitions	The submitter seeks to amend the Definition for Conservation Activities	Oppose	The activities that the submitter seeks to delete are forms of conservation activities and should be acknowledged as such. Stock exclusion is	Decline the relief sought.

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Society of New Zealand			removing stock exclusion and riparian fencing among other things.		crucial for the preservation of areas of significant indigenous flora and fauna while stock riparian planting is a positive means of preventing the further degradation of waterways. It would be inappropriate to omit activities such as these from the definition as conservation activities can and do take many different forms.	
Royal Forest and Bird Protection Society of New Zealand	47.12	16. Strategic direction, urban from and development	The submitter seeks an amendment to Objective SD-O28, so the objective aligns with the National Policy Statement for Highly Productive Land. The submitter contends that the flow on effect of urban expansion onto Highly Productive Land is agricultural intensification at less desirable locations and loss and degradation of indigenous biodiversity.	Support	Federated Farmers supports protecting rural land from inappropriate development. The District Plan is required to give effect to the National Policy Statement for Highly Productive Land. It is essential that the crucial role highly productive land plays in supporting New Zealand's agricultural sector is recognised as well as the need to safeguard it for future generations.	Grant the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.73	26. Ecosystems and indigenous biodiversity	The submitter seeks amendments to the Overview of the chapter and the scope of the provisions to include rules and policy for the maintenance of indigenous biodiversity including significant natural areas.	Oppose	In Federated Farmers New Zealand view many of the concerns expressed in this submission are already adequately addressed by the proposed plan.	Decline the relief sought
Royal Forest and Bird Protection Society of New Zealand	47.74	26. Ecosystems and indigenous biodiversity	The submitter seeks clarification that the maintenance of indigenous biodiversity is not limited to areas only classified as significant natural areas.	Oppose	Federated Farmers considers that it is inappropriate to impose unnecessary and burdensome obligations on private landowners for biodiversity maintenance, enhancement, and restoration outside of Significant Natural Areas.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.75	26. Ecosystems and indigenous biodiversity	Amend the overview to explain that areas meeting the significance criteria are identified in Schedule 6 and on the planning maps, and that further areas may be identified on a case-by-case basis through resource consent processes.	Oppose	Plan users rely on mapping and scheduling for clarity when interpreting plans. The proposed changes will create uncertainty for landowners over how they can use their land.	Decline the relief sought.

Submitter	Submission Number	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Royal Forest and Bird Protection Society of New Zealand	47.79	26. Ecosystems and indigenous biodiversity	The submitter seeks to delete and rewrite Objective ECO-O1.	Oppose	The notified wording of objective ECO-O1 is appropriate and does not place unwarranted restrictions on landowners utilising their land. The holistic approach asked for by the submitter is already accounted for by other provisions in the chapter.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.80	26. Ecosystems and indigenous biodiversity	The submitter seeks the deletion of Objective ECO-O3 on the grounds that adverse effects on indigenous biodiversity should be avoided, remedied or mitigated and that it is not possible to assess an activity via a permitted activity rule.	Oppose	The objective as written allows for a balance between the conservation of indigenous biodiversity and appropriate development. If an activity has no more than minor effects, the Courts have held that it is permissible for that activity to occur.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.81	26. Ecosystems and indigenous biodiversity	The submitter seeks to amend Objective ECO-O4 so that it is required to maintain and enhance rather than just maintain or enhance.	Oppose	The proposed wording to maintain, enhance and where possible restore district wide indigenous biodiversity will widen the scope of what is required to be done and is too onerous on landowners.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.84	26. Ecosystems and indigenous biodiversity	The submitter seeks substantial amendments to the Policies within the ECO chapter of the plan.	Oppose	Federated Farmers made a submission in support of the provisions of the chapter. The amendments sought by the submitter are unclear as to what is being sought and have the potential to adversely affect the ability of farmers to continue with lawfully established operations.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.85	26. Ecosystems and indigenous biodiversity	The submitter seeks to delete and rewrite Policy ECO-P1.	Oppose	The proposed policy is unnecessary and does not provide more clarity and certainty than the notified version of Policy ECO-P1. It is difficult to understand and unclear on what will occur once a significant natural area has been identified through a resource consent process. How will new significant natural areas be put into the district plan after they have been identified so that it is recognised?	Decline the relief sought.

Submitter	Submission Number	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Royal Forest and Bird Protection Society of New Zealand	47.86	26. Ecosystems and indigenous biodiversity	New policy ECO-PX sought by the submitter that sets out the effects management hierarchy for adverse effects on indigenous biodiversity a	Oppose	The new policy as unnecessary as the effects management hierarchy is clear and easy to follow for plan users in the notified version of the plan.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.87	26. Ecosystems and indigenous biodiversity	The submitter seeks to delete Policy ECO-P2 and to replace it with a new policy that they have provided in their submission.	Oppose	The new policy is unnecessary and unreasonably restrictive on landowners. It lacks clarity extends the scope of the policy in the notified version of the plan.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.88	26. Ecosystems and indigenous biodiversity	The submitter seeks to delete Policy ECO-P3 in its entirety.	Oppose	Federated Farmers supported this policy in its submissions. The retention of the proposed permitted activity rules and standards as outlined in the chapter maintain a balance between the conservation of indigenous biodiversity and appropriate land use.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.89	26. Ecosystems and indigenous biodiversity	The submitter seeks to delete Policy ECO-P4 as a whole.	Oppose	Federated Farmers supported the notified Policy and wants it retained. Deletion of Policy ECO-P4 is inconsistent with the planning approach of the proposed plan and is not supported.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.90	26. Ecosystems and indigenous biodiversity	The submitter seeks to amend Policy ECO-P5, so that (amongst other matters) climate change factors are referred to.	Oppose	The amended policy lacks clarity, is difficult to read and is unnecessarily complicated.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.91	26. Ecosystems and indigenous biodiversity	The submitter seeks to delete Policy ECO-P6 and incorporate parts of it into new Policy ECO-PX as set out in their submission.	Oppose	The notified policy promotes sustainable land management practices that benefit both agricultural productivity and the preservation of natural ecosystems. Federated Farmers supports the importance of recognising voluntary actions by landowners to mitigate the adverse effects of stock grazing and pest infestations through fencing and covenants.	Decline the relief sought.

Submitter	Submission Number	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
					As Federated Farmers does not support the inclusion of new Policy ECO-PX, the relief sought to transfer clauses 1 to 13 into that new policy is not supported.	
Royal Forest and Bird Protection Society of New Zealand	47.93	26. Ecosystems and indigenous biodiversity	Amend Policy ECO-P8 to introduce more specific provisions and considerations in relation to indigenous vegetation clearance for forestry or woodlots.	Oppose	<p>The changes introduced in the amended policy may be perceived as overly restrictive and burdensome for farmers and landowners. The requirement to control indigenous vegetation clearance for forestry or woodlots may be seen as limiting the flexibility and economic viability of agricultural activities.</p> <p>The amended policy's emphasis on avoiding activities within significant natural areas and setting new activities back at least 500 meters from such areas can be viewed as excessively precautionary. This setback requirement may impede the efficient use of land for agricultural purposes and limit farmers' ability to optimize their operations.</p>	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.94	26. Ecosystems and indigenous biodiversity	Amend Policy ECO-P9 to introduce strict setbacks from Schedule 6 listed Significant Natural Areas for new plantation forests.	Oppose	The proposed amendment lacks clarity, and the suggested setback is unrealistic and unnecessary. It is not up to the submitter to seek to impose such onerous setbacks which will significantly limit land use flexibility.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.97	26. Ecosystems and indigenous biodiversity	Amend Policy ECO-P12 to remove the requirement to 'enhance' and make it a requirement to 'provide'.	Oppose	The amendments sought to the policy will require something to be done while the word enhances implies that you build on something already in existence. The change in terms has the potential to increase the obligations and responsibilities of landowners through requiring them to allocate more resources towards biodiversity conservation efforts. The change sought is not needed and is unwarranted.	Decline the relief sought.

Submitter	Submission Number	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Royal Forest and Bird Protection Society of New Zealand	47.98	26. Ecosystems and indigenous biodiversity	Amend Policy ECO-P13 to introduce the concepts of adverse effects, the retention of buffers for protection and the maintenance and protection of habitat of nationally threatened or at-risk indigenous species, recognising that exotic vegetation or pasture may provide significant habitat for breed, roosting, nesting and/or feeding.	Oppose	The focus on the maintenance and protection of certain species in exotic pasture is inappropriate and will significantly impede the ability of farmers and other rural activities to utilise their land efficiently and effectively. It needs to be recognised that landowners should be able to use their land within reason without any significant impediments to doing so unless there is a good reason that is backed by proven evidence.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.99	26. Ecosystems and indigenous biodiversity	The submitter seeks substantial amendments to the formatting, scope and wording of the Rules within the Ecosystems and Indigenous Biodiversity chapter of the plan.	Oppose	Federated Farmers made a submission in support of the provisions of the chapter. The amendments sought by the submitter have the potential to adversely affect the ability of farmers to continue with lawfully established operations.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.101	26. Ecosystems and indigenous biodiversity	The submitter seeks to amend Table 1 in the Ecosystems and Indigenous Biodiversity chapter so that it clearly applies to activities within Significant Natural Areas. The submitters seeks that the table includes both areas identified in Schedule 6 and any area that meets the significance criteria set out in Appendix 5 of the Waikato Regional Policy Statement.	Oppose	Federated Farmers does not support the relief sought as it will introduce uncertainty into the Proposed District Plan. Plan users depend on the clarity and consistency provided by mapping and scheduling within district plans to make well-informed decisions about their land. Introducing new areas without scheduling may lead to uncertainty and confusion, which could pose significant challenges for our members and other plan users.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.102	26. Ecosystems and indigenous biodiversity	The submitter seeks to delete Rule ECO-R2 as it believes that the rule disregards the Council's obligations under the Resource Management Act 1991.	Oppose	ECO-R2 encourages and reinforces the positive conservation actions taken by landowners in the district. Retaining the Rule allows for flexibility and adaptive management approaches to conservation.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.103	26. Ecosystems and indigenous biodiversity	The submitter seeks an amendment to Rule ECO-R3 to only allow the removal of dead and damaged indigenous vegetation where there is an imminent threat to human life.	Oppose	Federated Farmers fully supports the permitted activity status for the removal of dead or damaged indigenous vegetation or indigenous vegetation where there is an imminent threat to human life as notified.	Decline the relief sought.

Submitter	Submission Number	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Royal Forest and Bird Protection Society of New Zealand	47.104	26. Ecosystems and indigenous biodiversity	The submitter seeks to amend Rule ECO-R4 and introduce limits and setbacks for fencing and trimming, pruning and removal of indigenous vegetation.	Oppose	The notified rule relates to perimeter fences not internal fences that may go through a Significant Natural Area. The proposed setbacks are overly restrictive and unwarranted. It is essential that fencing for stock exclusion can occur with as few barriers as possible as this is one means of protecting water quality and maintaining significant natural areas.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.105	26. Ecosystems and indigenous biodiversity	The submitter seeks to amend Rule ECO-R5 and remove fences from the rule.	Oppose	Fence maintenance is crucial for effective farming operations. Allowing lawfully established fences to maintain a 2m clearance is appropriate, ensuring proper stock exclusion, minimizing fence pressure, and facilitating overall farm management.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.106	26. Ecosystems and indigenous biodiversity	The submitter seeks to delete Rule ECO-R6 in its entirety as it believes it is not clear what is providing for.	Oppose	Federated Farmers supports the notified version the rule as it recognises the need for unique circumstances where clearance of indigenous vegetation may be necessary.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.107	26. Ecosystems and indigenous biodiversity	The submitter seeks to delete Rule ECO-R7 as a whole.	Oppose	Federated Farmers supports the notified version of the rule as it prioritises health, safety and resilience against the threat of fires.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.109	26. Ecosystems and indigenous biodiversity	The submitter seeks to delete Rule ECO-R9 in its entirety as it is not clear why or to what extent pest management activities would need to include the clearance of indigenous vegetation.	Oppose	The relief sought by the submitter is opposed. The rule specifically provides for the clearance of indigenous vegetation for pest management activities as a permitted activity. The classification is appropriate and is consistent with the Waikato Regional Pest Management Strategy 2022-2023.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.110	26. Ecosystems and indigenous biodiversity	The submitter seeks to delete or amend Rule ECO-R10 to be consistent with the amendment it has sought to the term	Oppose	Federated Farmers does not support the amendment of the definition of conservation activities as the submitter seeks the exclusion of stock exclusion activities. The deletion of the rule or amendment to take account of the	Decline the relief sought.

Submitter	Submission Number	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Society of New Zealand			'conservation activities' (submission point 47.04 above).		amended definition sought is also not support by Federated Farmers.	
Royal Forest and Bird Protection Society of New Zealand	47.111	26. Ecosystems and indigenous biodiversity	The submitter seeks to either delete or amend rules ECO-R1, ECO-R2, ECO-R6, ECO-R7 and ECO-R9 and to amend rules ECO-R3, ECO-R4, ECO-R5, ECO-R8 and ECO-R10.	Oppose	Federated Farmers New Zealand does not support the deletion or amendment of the rules specified in this appeal point. It is considered that the notified version of the proposed district has the right balance between the maintenance of indigenous vegetation and enabling everyday activities such as fencing to occur.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.112	26. Ecosystems and indigenous biodiversity	The submitter seeks to introduce new rule ECO-RAA in respect of the subdivision of land to create allotments on a site with a significant natural area indigenous biodiversity. The rule would classify this activity as a controlled activity.	Oppose	The proposed new rule is unnecessary as existing provisions within the subdivision chapter already offer protection for Significant Natural Areas.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.114	26. Ecosystems and indigenous biodiversity	The submitter seeks to amend Rule ECO-R11 so that it applies to building platforms within a site that includes a Significant Natural Area or part of a Significant Natural Area. A change in activity status from permitted to controlled has also been sought.	Oppose	The relief sought is unnecessary as the rule clearly sets out the standard that must be met if the activity is to be permitted. If the standards are not able to be met, then the activity must comply with rule ECO-R16 which classifies the removal of indigenous vegetation for any other purpose and where compliance with rules ECO-R1 to ECO-R12 cannot be achieved as discretionary activities. If the standards in rule ECO-R16 are not met, then the activity defaults to being non-complying. The ECO rules set out clear controls for activities within a significant natural area.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.115	26. Ecosystems and indigenous biodiversity	The submitter seeks the amendment of Rule ECO-R12 dealing with small scale renewable energy generation and change the activity classification from permitted to restricted discretionary.	Oppose	Federated Farmers supports the notified version of the rule, as it recognises the importance of supporting and incentivising small-scale renewable energy generation activities instead of imposing restrictions that could make the process more challenging.	Decline the relief sought.

Submitter	Submission Number	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
					If the standards are not able to be met, then the activity must comply with rule ECO-R16 which classifies the removal of indigenous vegetation for any other purpose and where compliance with rules ECO-R1 to ECO-R12 cannot be achieved as discretionary activities. If the standards in rule ECO-R16 are not met, then the activity defaults to being non-complying. The ECO rules set out clear controls for activities within a significant natural area.	
Royal Forest and Bird Protection Society of New Zealand	47.116	26. Ecosystems and indigenous biodiversity	The submitter seeks to delete Rule ECO-R13 in its entirety. The rule provides for the removal of manuka or kanuka on sustainable basis.	Oppose	Federated Farmers opposes the relief sought by the submitter. The permitted status of removing manuka or kanuka sustainably is supported and should be retained. Manuka and kanuka can act as weeds on farms and invade pasture, due to its unpalatability to livestock it does tend to grow on pasture and reduce productivity.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.118	26. Ecosystems and indigenous biodiversity	The submitter seeks the deletion of Rule ECO-R15 which provides for the continuous cover forestry and/or sustainable forest management / sustainable harvesting as a discretionary activity.	Oppose	The notified version of the rule provides adequate protection for Significant Natural Areas.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.119	26. Ecosystems and indigenous biodiversity	The submitter seeks to amend the activity status of Rule ECO-R16 from discretionary to Non-Complying. The rule is called 'Removal of indigenous vegetation for any other purpose (and where not compliant with ECO-R1 to ECO-R12)'.	Oppose	The relief sought is opposed. It is not appropriate to make every activity automatically a non-complying activity. The rule as currently worded provides for levels of effects and defaults to non-complying when the relevant standards are not able to be met.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.120	26. Ecosystems and indigenous biodiversity	The submitter seeks to amend Rule ECO-R17 'Plantation forestry afforestation and harvesting' from a non-complying to prohibited activity status.	Oppose	Federated Farmers considers a Non-Complying activity status appropriate for the rule. The proposed activity status change is onerous and overly restrictive.	Decline the relief sought.

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Royal Forest and Bird Protection Society of New Zealand	47.121	26. Ecosystems and indigenous biodiversity	<p>The submitter seeks to add a new table which applies to the clearance of indigenous vegetation outside of significant natural areas. The table would introduce setbacks for the maintenance, operation and repair of lawfully established structures such as tracks and fences.</p> <p>The submitter also seeks to introduce new rules to provide for non-significant indigenous vegetation and its clearance.</p>	Oppose	<p>The proposed relief is opposed. It needs to be acknowledged that not all indigenous vegetation can be maintained or protected when it comes to privately owned land. The proposed table is unnecessary and will restrict landowners from utilising their land effectively and efficiently.</p> <p>Federated Farmers does not support the relief sought as it implies that all indigenous vegetation must be protected to a certain extent which may not always be the case. Any imposition of setbacks will restrict how a landowner can utilise their land and careful consideration needs to be given to this rather than the taking of a blanket approach to all indigenous vegetation which is what appears to have been done.</p>	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.122	26. Ecosystems and indigenous biodiversity	A new rule is sought for the Ecosystems and Indigenous Biodiversity chapter for indigenous vegetation clearance for mineral extraction and quarrying activities as a discretionary activity.	Oppose	<p>The proposed new rule refers to an assessment being done that demonstrates that the clearance and disturbance is not within a significant natural area not yet listed in Schedule 6.</p> <p>Federated Farmers has consistently opposed the areas being labelled as significant natural areas and not being included in the appropriate schedule. There needs to be certainty for plan users over where these significant natural areas are located and having these areas listed in a schedule to the District Plan achieves this and is appropriate.</p>	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.123	26. Ecosystems and indigenous biodiversity	The submitter seeks the addition of a new rule that addresses setbacks for vegetation clearance from water bodies.	Oppose	The proposed new rule is not supported as it implies all vegetation clearance will adversely impact on water bodies. This is not always the case with some stream and river restorations removing introduced vegetation from the margins and replacing it where appropriate with	Decline the relief sought.

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					indigenous vegetation. A one size fits all approach to vegetation clearance is not considered to be appropriate for a district plan.	
Royal Forest and Bird Protection Society of New Zealand	47.124	26. Ecosystems and indigenous biodiversity	The submitter seeks to add provisions for protection of bat habitats including corridors as well as the corridors of other highly mobile species.	Oppose	While supporting the intent behind the rule which is to provide for corridors for bats and other highly mobile species, it is not appropriate for this to occur without an appropriate Schedule 1 process being undertaken. Landowners must be included in any such consultation and discussion as it is likely that any new provisions would directly affect private land.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.126	27. Natural Character	The submitter seeks to amend policy NATC-P1, particularly clause 7 which addresses lawfully established farming operations.	Oppose	Federated Farmers opposes the relief sought. Clause 7 refers to 'lawfully established' farm activities which implies that the activities are already compliant with all existing Plan rules and any consent requirements. The relief sought seeks to retroactively place constraints on lawful operations which is inappropriate and unwarranted.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.127	27. Natural Character	The submitter seeks to amend Policy NATC-P2, particularly clause 6 which addresses lawfully established farming operations.	Oppose	It is important that lawfully established farming operations are enabled to continue. Federated Farmers opposes the relief sought. The relief sought seeks to retroactively place constraints on lawful operations which is inappropriate and unwarranted.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.128	28. Natural features and landscapes	The submitter seeks to amend NFL-P4 including clause 6 which provides for the continued operation of lawfully established planning activities.	Oppose	Federated Farmers opposes the relief sought. It is important that lawfully established farming operations are enabled to continue. The relief sought seeks to retroactively place constraints on lawful operations which is inappropriate.	Decline the relief sought.
Royal Forest and Bird Protection	47.130	28. Natural features and landscapes	The submitter seeks amendments to rules in the Natural Features and Landscapes chapter to ensure that adverse effects to be avoided under	Oppose	Federated Farmers opposes the relief sought. The submitter seeks to change all permitted rules in outstanding areas to restricted discretionary or, alternatively reduce the scale	Decline the relief sought.

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Society of New Zealand			Policy 15 of the New Zealand Coastal Policy Statement are not caused through permitted activities.		<p>of activities by at least half of what has been set out in proposed rules.</p> <p>The approach defined in the rules is consistent with Federated Farmers view that minor works should be allowed within outstanding natural features. The scale of activities is appropriate and allows for existing, lawfully established activities and operations to continue.</p>	
Royal Forest and Bird Protection Society of New Zealand	47.131	28. Natural features and landscapes	The submitter seeks to amend Rule NFL-R13 so that plantation forestry afforestation becomes a prohibited activity in Outstanding natural features and a non-complying activity in Outstanding landscapes. It is unclear what the submitter is seeking as rule NFL-R13 is in respect of plantation forestry harvesting and rule NFL-R12 Plantation Forestry Afforestation	Oppose	It appears that the submitter intended to submit on NFL-R12 Plantation Forestry Afforestation. If this is the case, Federated Farmers supports the notified version and the associated activity status given in the rule. Afforestation is often undertaken to combat deforestation, enhance biodiversity, mitigate climate change by capturing carbon dioxide, and provide various ecological and environmental benefits. The proposed amendments do not promote the sustainable management of a natural resource and are overly restrictive.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.132	28. Natural features and landscapes	The submitter seeks to amend Rule NFL-R14 which deals with continuous cover forestry and/or sustainable forest management / sustainable harvesting. The submitter seeks an additional condition that this activity should not occur in the coastal environment and seeks that it is given a prohibited activity status.	Oppose	Federated Farmers opposes the relief sought by the submitter. To go from a permitted activity status to prohibited is unwarranted and onerous. No specific reasons have been given by the submitter for what has been sought. It has also been implied that this provision does not give effect to the relevant provision in the New Zealand Coastal Policy Statement which is a document the Council knows it has to give legal effect to.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.133	28. Natural features and landscapes	The submitter seeks to delete Rule NFL-R15 which addresses the removal of indigenous vegetation outside of a significant natural area. The submitter also seeks the inclusion of a reference within the rules on the ECO chapter that	Oppose	The amendments sought by the submitter have the potential to adversely affect the ability of farmers to continue with lawfully established operations.	Decline the relief sought.

Submitter	Submission Number	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
			relates to specific purposes and defines limits to maintain indigenous biodiversity and ensure further areas of significance can be identified.			
Royal Forest and Bird Protection Society of New Zealand	47.135	28. Natural features and landscapes	The submitter seeks to amend NFL-R19 which is the performance standard for continuous cover forestry and / or sustainable forest management / sustainable harvesting rule so that these activities are not permitted in the coastal environment.	Oppose	Federated Farmers consider the notified version of the rule and its associated permitted and restricted discretionary status appropriate and consistent with the purpose of the Resource Management Act 1991. The relief sought is not required and seeks the imposition of a blanket approach to vegetation clearance which will severely impact on landowners.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.136	28. Natural features and landscapes	The submitter seeks to amend NFL-R20 which deals with plantation forestry afforestation so that the activity becomes a prohibited activity in Outstanding natural features and non-complying in Outstanding landscapes as well as increasing the required setback from the coastal marine area from 20m to 50m.	Oppose	The relief sought is opposed by federated Farmers. The suggested amendments to the activity status and increased setback are onerous and overly restrictive on landowners. It is not up to the submitter to seek to impose such onerous setbacks which will significantly limit land use flexibility.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.137	28. Natural features and landscapes	The submitter seeks to amend NFL-R21 which deals with the harvesting of plantation forestry so that the setback for replanting from the coastal marine areas and water bodies increases from 20m to a minimum of 30m.	Oppose	Please refer to the reasons given for submission point 47.136 above.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.138	29. Subdivision	The submitter seeks to add a paragraph to the overview of the Subdivision chapter to promote indigenous biodiversity outcomes as part of any subdivision. Their relief also seeks the addition of a new objective to the chapter to promote positive indigenous biodiversity outcomes as part of any subdivision. A new policy to the chapter	Oppose	The relief sought is not supported. The subdivision chapter already contains provisions protecting indigenous vegetation, Federated Farmers consider further provisions unnecessary and onerous for landowners.	Decline the relief sought.

Submitter	Submission Number	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
			is also sought to support the new objective.			
Royal Forest and Bird Protection Society of New Zealand	47.139	29. Subdivision	The submitter seeks an amendment to SUB-O4 by removing the word 'identified' from the objective so that the objective refers to 'values' rather than identified values.	Oppose	Federated Farmers considers the word 'identified' fundamental to the objective. The process of identification and scheduling is what creates certainty and clarity for plan users.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.141	29. Subdivision	<p>The submitter seeks to amend SUB-P24 to ensure that subdivision permanently retains and protects scheduled sites and features and archaeological sites within one site.</p> <p>As well the submitter seeks further amendments to the existing policy or the inclusion of a new policy to set direction for the assessment of subdivision sites against the significance criteria in Appendix 5 of the Waikato Regional Policy Statement and to protect any Significant Natural Areas so identified the same as for those in Schedule 6.</p> <p>New rules were also sought to implement the policy that required subdivision to include an assessment demonstrating whether the significance criteria in Appendix 5 of the Waikato Regional Policy Statement have been met or not. The subdivision must ensure there is sufficient land area within each allotment for a building platform and access to this without affecting any significant natural area, scheduled or identified through the site assessment, in the allotment.</p>	Oppose	Federated Farmers does not support the relief put forward by the submitter. It is considered that the notified proposed district plan already contains adequate protection for significant natural areas within the provisions and the relief sought is unnecessary and creates an additional burden on landowners.	Decline the relief sought.
Royal Forest and Bird Protection	47.142	29. Subdivision	The submitter seeks to amend rule SUB-R1 which deals with subdivision to create allotments in all zones to ensure any	Oppose	This relief is not supported. Requiring that any significant natural area must be within one allotment could lead to increased land	Decline the relief sought.

Submitter	Submission Number	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Society of New Zealand			significant natural area, scheduled or identified through the site assessment, is contained in one allotment.		fragmentation, which can be detrimental to efficient farming practices. Farmers often require larger, contiguous areas for various agricultural activities. This rule might limit their ability to use their land effectively. The proposed rule also has the potential to impact on flexibility in land use decisions.	
Royal Forest and Bird Protection Society of New Zealand	47.143	29. Subdivision	The submitter seeks to amend the matters over which discretion is restricted for SUB-R1 to include significant habitat of indigenous fauna and any significant natural area identified through the site assessment.	Oppose	<p>Federated Farmers does not support the relief sought by the submitter. The submitters propose amendments to ECO-P13, requesting the acknowledgment of pasture as potential habitat for long-tailed bats. To then include significant habitats for indigenous fauna within multiple chapters of the district plan, as per the submitter's submissions, will encompass vast cultivated and legally established pasture areas. This, in turn, would likely result in substantial adverse effects on the regular farming operations.</p> <p>The submitter also seeks to protect unscheduled significant natural areas which will severely impact on how a landowner can use their land. The inclusion of significant natural areas in the district plan provides certainty as well an indication of areas that have additional restrictions placed over them because they are significantly natural. The relief does not promote the sustainable management of all natural resources, it seeks to protect one particular resource which is inappropriate.</p>	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.144	29. Subdivision	The submitter seeks to add a new clause to rule SUB-R2 so that a boundary adjustment must ensure any significant natural area, scheduled or identified through the site assessment, is in one allotment.'	Oppose	Federated Farmers opposes the relief sought. Requiring that any significant natural area must be within one allotment will lead to increased land fragmentation and unusable lots as lots will need to be designed around the significant natural area rather than on practical needs. This could be detrimental to efficient farming	Decline the relief sought.

Submitter	Submission Number	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
					practices. Farmers often require larger, contiguous areas for various agricultural activities, and the proposed rule could hinder farmers' flexibility in land use decisions.	
Royal Forest and Bird Protection Society of New Zealand	47.145	29. Subdivision	The submitter seeks to amend rule SUB-R2(c) to include significant habitat of indigenous fauna and any significant natural area identified through the site assessment.	Oppose	In their submission the submitter has identified pasture as a potential habitat for long tailed bats. The relief sought by the submitter would widen the scope of the rule increases its scope without engagement with affected parties. The relief sought would make the rule unnecessarily onerous on landowners and could limit their ability to use their land effectively and efficiently.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.146	29. Subdivision	The submitter seeks to amend rule SUB-R3 to include significant natural areas identified through site assessment.	Oppose	The amendment sought by the submitter has the potential to adversely affect the ability of farmers to continue with lawfully established operations. Federated Farmers does not support the relief sought as it will introduce uncertainty into the Proposed District Plan by having significant natural areas that sit outside the scheduled sites in the Plan.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.147	29. Subdivision	The submitter seeks to amend rule SUB-R4(c) and include significant habitat of indigenous fauna and any significant natural area identified through the site assessment.	Oppose	In their submission the submitter has identified pasture as a potential habitat for long tailed bats. The relief sought by the submitter would widen the scope of the rule increases its scope without engagement with affected parties. The relief sought would make the rule unnecessarily onerous on landowners and could limit their ability to use their land effectively and efficiently.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.148	29. Subdivision	The submitter seeks to amend rule SUB-R7(c) and include significant habitat of indigenous fauna and any significant natural area identified through the site assessment.	oppose	In their submission the submitter has identified pasture as a potential habitat for long tailed bats. The relief sought by the submitter would widen the scope of the rule increases its scope without engagement with affected parties. The relief sought would make the rule unnecessarily onerous on landowners and could limit their ability to use their land effectively and efficiently.	Decline the relief sought.

Submitter	Submission Number	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Royal Forest and Bird Protection Society of New Zealand	47.149	29. Subdivision	The submitter seeks to amend rule SUB-R11 which deals with the subdivision of land containing a scheduled feature or site or located in a hazard area or coastal hazards area. They want the activity status amended from a discretionary activity to a non-complying activity.	Oppose	Federated Farmers supports the notified activity status of rule SUB-R11. The proposed changes are not supported, are unwarranted and will further restrict land use flexibility.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.154	32. Coastal environment	The submitter seeks to add that objective CE-O1 should say that natural character will be protected.	Oppose	The relief sought is not supported by Federated Farmers. Policy 13 of the New Zealand Coastal Policy Statement requires the preservation of the natural character of the coastal environment and to protect it from inappropriate subdivision, use and development. The relief sought would encompass appropriate subdivision, use and development and would increase the scope of the objective.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.163	33. Earthworks	The submitter seeks that any permitted earthworks within significant natural areas not otherwise restricted by rules in the ECO chapter are limited to no more than 250m ³ . Earthworks exceeding this volume should be a Discretionary activity within Significant Natural Areas.	Oppose	Federated Farmers finds the proposed amendment excessively restrictive and believes it will have a negative impact on farmers' ability to conduct their day-to-day farming operations.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.165	35. Hapori whānui	The submitter seeks to amend the note under rule HW-R8 suggesting that clearance of any indigenous vegetation outside Significant Natural Areas should be restricted to ensure that biodiversity is maintained and further Significant Natural Areas are identified.	Oppose	The amendment sought by the submitter has the potential to adversely affect the ability of farmers to continue with lawfully established operations including fencing, track maintenance and for health and safety reasons. It is not realistic to impose such severe restrictions on landowners undertaking everyday activities.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.174	42. General rural zone	The submitter seeks an amendment to rule GRUZ-P1(7) to enable hunting activities for the purposes of protecting indigenous fauna.	Oppose	Federated Farmers agrees with the submitter that the notified wording of the policy could be interpreted in a manner that may lead to the maintenance of introduced pest animal populations like deer, goats, pigs, and possums at levels suitable for recreational hunting.	Decline the relief sought.

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					However, the proposed amendment 'for the purposes of protecting indigenous biodiversity' deviates from the original policy's intent and creates confusion in the policy. It is not appropriate to limit such an activity to only being able to occur based on the purpose of protecting indigenous biodiversity.	
Royal Forest and Bird Protection Society of New Zealand	47.176	42. General rural zone	The submitter seeks the deletion of rule GRUZ-R15	Oppose	The notified rule is consistent with the planning approach taken throughout the notified plan. Federated Farmers supports this rule and the approach taken by the Waitomo District Council as it allows more flexibility in land use decisions by landowners.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.177	43. Rural production zone	The submitter seeks the deletion of policy RPROZ-P2 because the effects mitigation framework is inappropriate.	Oppose	Federated Farmers opposes the deletion of the rule as sought by the submitter. The effects mitigation framework is appropriate and consistent with the approach outlined in the Resource Management Act 1991.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.178	44. Rural lifestyle zone	The submitter seeks to include protection of habitats for indigenous fauna in the Rural Lifestyle Zone overview.	Oppose	The relief sought by the submitter is inappropriate and inconsistent with Part 2 of the Resource Management Act 1991. To require the protection of all indigenous vegetation would place severe restrictions in front of landowners over the use of their land. As previously mentioned by the submitter, habitats of indigenous fauna could encompass pasture areas. This inclusion in the plan could have significant and potentially costly implications for landowners	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.178	44. Rural lifestyle zone	The submitter seeks to amend objective RLZ-01 so that it refers to the maintenance and enhancement of indigenous biodiversity.	Oppose	The relief sought by the submitter is inappropriate and inconsistent with Part 2 of the Resource Management Act 1991. The focus of the rural lifestyle zone has been accurately described in the objective. Indigenous biodiversity would fall under the gambit of rural	Decline the relief sought.

Submitter	Submission Number	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
					character if it were significant enough to warrant such recognition,	
Royal Forest and Bird Protection Society of New Zealand	47.180	44. Rural lifestyle zone	The submitter seeks to amend policy RLZ-P4 to manage activities near unscheduled areas.	Oppose	It is assumed that the submitter intended to refer to policy RLZ-P3 which is the policy in the notified proposed district plan that addresses activities near scheduled features. It is unrealistic to seek to extend this policy to include unscheduled features. Plan users rely on scheduling for clarity and certainty when making land use decisions. The proposed amendment will cause confusion and place unnecessary restrictions on land use. There is a high risk that restrictions will be placed unnecessarily on features that had not warranted inclusion in the relevant schedule of the proposed district plan.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.184	49. Natural Open space zone	The submitter has sought the amendment of the overview so that it refers to indigenous vegetation.	Oppose	The relief sought is not supported by Federated Farmers. It is considered that the relief is unnecessary as indigenous vegetation could be encompassed under the zone's natural, and ecological values. For the amendment sought to be consistent with s6(c) of the Resource Management Act 1991 it would need to refer specifically to significant indigenous vegetation and significant habitats of indigenous fauna rather than just indigenous vegetation.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.185	49. Natural Open space zone	The submitter has sought an amendment to the objective so that it refers to indigenous vegetation.	Oppose	Refer to the reasons given for submission point 47.184 above.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand	47.188	49. Natural Open space zone	The submitter has sought the amendment of clause 4 of the policy so that it refers to indigenous vegetation.	Oppose	Refer to the reasons given for submission point 47.184 above.	Decline the relief sought.

Submitter	Submission Number	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Royal Forest and Bird Protection Society of New Zealand	47.189	49. Open space zone	The submitter seeks to amend policy OSZ-P2(2) to retain open space and indigenous vegetation as far as practicable and protect and maintain indigenous biodiversity in accordance with the ECO chapter provisions.	Oppose	Federated Farmers opposed several of the proposed amendments to the ECO chapter sought by the submitter. The relief sought is unnecessary and not justified given that it relates to all indigenous vegetation and not just significant vegetation. The amendments sought to this policy are opposed as there are potential unintended consequences and the disruption of the delicate environmental-agricultural balance.	Decline the relief sought.
Te Nehenehenui Trust	50.35	SCHED5 – Sites and areas of significance to Māori - cultural alert layer	The submitter supports the retention of Schedule 5 - Sites and areas of significance to Māori - cultural alert layer and seeks the addition of a protection buffer of 50m or more to these sites.	Oppose	Federated Farmers supports Schedule 5 as notified but opposes the proposed 50m or more protection buffer that has been sought. The proposed amendment is overly restrictive and raises concerns for our members ability to use their land effectively and efficiently.	Decline the relief sought.
Department of Conservation	53.06	9. Definitions	The submitter seeks the addition of a new definition for Bat Protection Area in the District Plan.	Oppose	The proposed definition refers to areas of significant habitat that provide for breeding, roosting, foraging and commuting. Federated Farmers has raised concerns elsewhere in these further submissions about the inclusion of pasture as a significant habitat for bats and the effect this could have on our members and land use.	Decline the relief sought.
Department of Conservation	53.09	9. Definitions	The submitter seeks the amendment of the definition of farm quarry so that it does not include earthworks, indigenous vegetation or habitat of indigenous fauna disturbance or the use of land and accessory buildings for offices, workshops and car parking area.	Oppose	Federated Farmer does not support the amendment sought. The activities sought to be excluded are important parts of farm quarries and would severely impact on the on-going operation of the quarry. The proposed amendment also seeks to go broader than what is provided for in the Resource Management Act 1911 which refers specifically to significant indigenous vegetation or habitat of indigenous fauna.	Decline the relief sought.

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Department of Conservation	53.11	9. Definitions	The submitter seeks a new definition for Significant Natural Area to be included in the plan.	Oppose	Federated Farmer agrees with the submitter that a definition of Significant Natural Area should be included in the District Plan. However, the definition should be limited to areas which have been mapped and scheduled within the proposed district plan. If an area has been assessed as significant under the Waikato Regional Policy Statement, then it should have been included in Schedule 6 of the Plan.	Decline the relief sought.
Department of Conservation	53.30	26. Ecosystems and indigenous biodiversity	The submitter seeks the inclusion of a new policy in the chapter that addresses the identification of significant natural areas.	Oppose	The relief sought is opposed by Federated Farmers. The submitters' proposed policy is inconsistent with the terminology used and could be interpreted to mean all indigenous vegetation rather than significant indigenous vegetation.	Decline the relief sought.
Department of Conservation	53.31	26. Ecosystems and indigenous biodiversity	The submitter seeks the inclusion of a new policy in respect of protecting and restoring Significant Natural Area's and other areas.	Oppose	The submitters' proposed policy is overly restrictive and does not provide for necessary and lawful clearance of vegetation as currently permitted in the proposed district plan. The clearance of indigenous vegetation in a Significant Natural Area is already addressed in policy ECO-P3.	Decline the relief sought.
Department of Conservation	53.32	26. Ecosystems and indigenous biodiversity	The submitter seeks to amend the wording of ECO-P2 so that a stronger protection directive applies to all Significant Natural Areas.	Oppose	The amended wording is ambiguous and lacks clarity. It is unclear what the submitter means by 'inappropriate land use practices'	Decline the relief sought.
Department of Conservation	53.33	26. Ecosystems and indigenous biodiversity	The submitter seeks the addition of a new policy which addresses the maintenance and enhancement of indigenous vegetation and habitats of indigenous fauna that do not meet the significance criteria.	Oppose	The proposed new policy is overly restrictive. It is considered that the notified provisions give effect to the Waikato Regional Policy Statement as well as meeting the Council's obligations with regards indigenous biodiversity both within and outside identified areas.	Decline the relief sought.
Department of Conservation	53.34	26. Ecosystems and indigenous biodiversity	The submitter seeks the addition of a new policy ECO-PX which addresses identifying and protecting important	Oppose	Federated Farmers is concerned that the proposed policy may encompass large areas of	Decline the relief sought.

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			habitat for native bats as a Bat Protection Area overlay on the planning maps.		farmland and will significantly impact day-to-day lawfully established farming operations.	
Department of Conservation	53.38	26. Ecosystems and indigenous biodiversity	The submitter seeks to amend Policy ECO-P6 and include any activity that will adversely affect indigenous biodiversity and protect and promote the long-term ecological functioning.	Oppose	Federated Farmers supports the notified wording of the policy and considers the amendment sought to extend the application of ECO-P6 too broad in its scope.	Decline the relief sought.
Department of Conservation	53.39	26. Ecosystems and indigenous biodiversity	The submitter seeks the amendment of Policy ECO-P3 and Rule ECO-R13 to significantly decrease the amount of Manuka or Kanuka allowed to be removed as a permitted activity.	Oppose	Federated Farmers New Zealand supports retention of the notified conditions as they relate to rule ECO-R13. Manuka and kanuka can act as weeds on farms and invade pasture, due to its unpalatability to livestock it does tend to grow on pasture and reduce productivity.	Decline the relief sought.
Department of Conservation	53.44	26. Ecosystems and indigenous biodiversity	The submitter seeks the addition of a new rule ECO-RX addressing the clearance of trees with the Bat Protection Area.	Oppose	Federated Farmers opposes the addition of a new rule restricting the clearance of trees. Many of our members may have planted woodlots with the intent of harvesting them at some point in the future, the proposed rule could restrict such activities.	Decline the relief sought.
Department of Conservation	53.45	26. Ecosystems and indigenous biodiversity	<p>The submitter seeks the amendment of rule ECO-R3 so that removal of damaged indigenous vegetation is not included in the rule.</p> <p>The submitter has also sought the deletion of rules ECO-R4, ECO-R6 and ECO-R9 as well as decreasing the clearance limit from 500m² at any one time to an annual limit of 100m² or 500m² over a 5-year period.</p>	Oppose	<p>Federated Farmers opposes the relief sought by the submitter. Rule ECO-R3 concerns health and safety, vegetation does not have to be dead to present a serious risk to a person's health.</p> <p>In respect of rule ECO-R4, it is essential that fencing for stock exclusion can occur with as few barriers as possible as this is one means of protecting water quality and maintaining significant natural areas.</p> <p>Federated Farmers supports the notified version of rule ECO-R6 as it recognises the need for unique circumstances where clearance of indigenous vegetation may be necessary.</p> <p>The relief sought by the submitter in respect of rule ECO-R9 is opposed. The rule specifically provides for the clearance of indigenous</p>	Decline the relief sought.

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					<p>vegetation for pest management activities as a permitted activity. The classification is appropriate and is consistent with the Waikato Regional Pest Management Strategy 2022-2023.</p> <p>The proposed amendments to clearance limits are opposed by Federated Farmers. The relief sought by the submitter has the potential to adversely affect the ability of farmers to continue with lawfully established operations including fencing, track maintenance and for health and safety reasons.</p>	
Department of Conservation	53.46	26. Ecosystems and indigenous biodiversity	The submitter seeks to amend rule ECO-R14 and reduce clearance limits from 500m ² to 50m ² and not more than 250m ² over a 5-year span for removal of indigenous vegetation for outdoor education activities or adventure tourism activities.	Oppose	Federated Farmers considers the relief sought overly restrictive and that the reduced clearance limits would negatively impact on landowners' ability to effectively use the land for outdoor education activities or adventure tourism activities.	Decline the relief sought.
Department of Conservation	53.51	27. Natural character	The submitter seeks to amend policy NATC-P2 to include the words 'restored and enhanced' in relation to the values of wetlands and lakes.	Oppose	Federated Farmers opposes the relief sought and considers the proposed amendment onerous and the requirement to 'enhance' a wetland or lake an unnecessary burden on landowners.	Decline the relief sought.
Department of Conservation	53.59	32. Coastal environment	The submitter seeks to remove the word minimising from policy CE-P6.6 so that no removal of indigenous vegetation is allowed.	Oppose	Federated Farmers opposes the relief sought as there may be times where there will be valid and essential reasons for the removal of indigenous vegetation.	Decline the relief sought.
Department of Conservation	53.69	43. Rural Production Zone	The submitter seeks to delete policy RPROZ-P2 because it believes that the policy lacks clarity and definition.	Oppose	The relief sought is opposed because Federated Farmers is aware that there are occasions when removal of indigenous vegetation in a significant natural area is either unavoidable or necessary and can lead to better ecological outcomes. The notified policy is	Decline the relief sought.

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					appropriate as it also follows the effects management hierarchy.	
Apiculture New Zealand	54.01	General	The submitter is concerned about potential changes to the District Plan with regards to aerial spraying changes in flight times. They ask that consideration is given to any potential impact on bee health. The submitter states that any spraying of a flowering crop, likely to be visited by bees, if needs to be done, should be done very early in the morning (daybreak) or at dusk (sunset), even spraying in the dark. Bees are normally in their hives at this time. It is also recommended to choose a calm, dry day to avoid spray drift.	Support	Federated Farmers supports the submitters position that council consider the health and well-being of bees in any proposed amendments to the District Plan. Bees play a vital role in agriculture including the ongoing health and well-being of pasture.	Grant the relief sought.