Federated Farmers of New Zealand

Further Submission on Proposed Waimakariri District Plan

21 November 2022

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FURTHER SUBMISSION TO WAIMAKARIRI DISTRICT COUNCIL ON PROPOSED WAIMKARIRI DISTRICT PLAN

Form 6

Further submission in support of, or in opposition to, submission on publicly notified proposed policy statement or plan

Clause 8 of First Schedule, Resource Management Act 1991

To: *Waimakariri District Council*
Private Bag 1005
Rangiora 7440

E: Developmentplanning@wmk.govt.nz

Name of further submitter: Federated Farmers of New Zealand – North Canterbury Province

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A copy of our further submission will be served on the original submitter(s) within five working days after making the further submission to the local authority.

This is a further submission in support of, and opposition to, submissions on the following proposed plan, the **Proposed Waimakariri District Plan.**

Where Federated Farmers submitted on the same point as any other submitter it stands by its original submission. This Further Submission seeks only to provide Federated Farmers views on points raised by other submitters that are not already covered in our original submission.

Federated Farmers is:

- *An organisation representing a relevant aspect of the public interest;*
- *An organisation which has an interest in the proposal that is greater than the interest the general public has.*

Grounds for further submission:

Federated Farmers of New Zealand is a representative body for farmers, so both represents a relevant aspect of the public interest and has an interest in the proposal that is greater than the interest that the general public has.

Federated Farmers supports or opposes the submissions of: Submitters stated in the table attached to this further submission.

The particular parts of the submissions Federated Farmers supports or opposes are: Variously stated with respect to respective submitters in the table attached to this further submission.

The reasons for our support or opposition are: Variously stated with respect to respective submitters in the table attached to this further submission.

We seek that the whole or part of the submissions be accepted or rejected: As variously stated with respect to respective submitters in the table attached to this further submission.

Federated Farmers wishes to be heard in support of its further submission. If others make a similar submission, we will consider presenting a joint case with them at a hearing.

We acknowledge that by taking part in this public submission process the submission (including names and addresses) will be made public.

Where Federated Farmers submitted on the same submission point as any other submitter it stands by its original submission.

This Further Submission provides Federated Farmers' views on points raised by other submitters.

Sub No.	Submitter Name	Section	Our position on this submission point is:	Reason for position	The decision we want Council to make:
295.2	Horticulture New Zealand	Description of District	Support	More explicit description.	Allow the submission point in full.
295.3	Horticulture New Zealand	Statutory Context	Support	More explicit statement.	Allow the submission point in full.
Definitions					
192.23	Royal Forest and Bird Protection Society of NZ	Definition of no net loss	Oppose	The definition is useful, especially if amended as requested in our submission	Disallow the submission point in full.
419.9	Department of Conservation	Definition of Conservation activity	Oppose	The list is useful and is not exclusive.	Disallow the submission point in full.
419.11	Department of Conservation	Definition of farm quarry	Oppose	The disturbance of vegetation is covered by the vegetation clearance rules.	Disallow the submission point in full.
419.13	Department of Conservation	Definition of improved pasture	Oppose	It makes no sense to require that pasture has been sown since 31 Dec 1999.	Disallow the submission point in full.
419.15	Department of Conservation	Definition of indigenous biodiversity offset	Oppose	Support Federated Farmers' submission to replace the definitions of Indigenous biodiversity offset and Biodiversity offset with a new definition of Indigenous biodiversity offset.	Disallow the submission point in full.

Sub No.	Submitter Name	Section	Our position on this submission point is:	Reason for position	The decision we want Council to make:
419.17	Department of Conservation	Definition of indigenous vegetation clearance	Oppose	FFNZ opposes the amendments sought and has submitted seeking its own amendment seeking to clarify the exclusion of the normal grazing of pasture or improved pasture species.	Disallow the submission point in full.
419.21	Department of Conservation	Definition of no net loss	Oppose	FFNZ prefers the relief sought in its original submission.	Disallow the submission point in full.
Strategic Direction					
192.28	Royal Forest and Bird Protection Society of NZ	Introduction	Oppose	The paragraph is about plan development, not consents, which are mor about implementation.	Disallow the submission point in full.
41.14	Fulton Hogan	SD-O3	Support	Important to ensure the resources to support the economy of the district.	Allow the submission point in full.
192.29	Royal Forest and Bird Protection Society of NZ	SD-O1	Oppose	FFNZ supports the notified version of clause 1 and the requested new clause 6 would be more within the scope of a regional plan.	Disallow the submission point in full.
295.69	Horticulture New Zealand	SD-O2	Support	FFNZ supports the protection of high value, versatile soils.	Allow the submission point in full.
Electricity and Infrastructure					
295.77	Horticulture New Zealand	EI-R13	Support	Important to minimise compliance costs.	Allow the submission point in full.
295.78	Horticulture New Zealand	EI-R16	Support	Important to minimise compliance costs.	Allow the submission point in full.

Sub No.	Submitter Name	Section	Our position on this submission point is:	Reason for position	The decision we want Council to make:
249.97	Resource Management Group Ltd	EI-MD2	Support	A degree of pragmatism needs to be applied.	Allow the submission point in full.
249.99	Resource Management Group Ltd	EI-MD5	Support	A degree of pragmatism needs to be applied.	Allow the submission point in full.
295.82	Horticulture New Zealand	EI-MD6	Support	Efficient to minimise compliance requirements.	Allow the submission point in full.
295.83	Horticulture New Zealand	EI-MD14	Support	Efficient to minimise compliance requirements.	Allow the submission point in full.
192.39	Royal Forest and Bird Protection Society of NZ	EI-P5	Oppose	Worth consideration where effects can not be avoided.	Disallow the submission point in full.
Transport					
295.84	Horticulture New Zealand	TRAN-P2	Support	Support the protection of highly productive land for food production.	Allow the submission point in full.
Natural Hazards					
210.6	Waimakariri Irrigation Ltd	NH-P12	Support	A degree of pragmatism needs to be applied.	Allow the submission point in full.
210.6	Waimakariri Irrigation Ltd	NH-P12	Support	The requested wording is simpler and clearer.	Allow the submission point in full.
419.58	Department of Conservation	NH-P9	Oppose	The requested change expands the reach of the policy too much.	Disallow the submission point in full.

Sub No.	Submitter Name	Section	Our position on this submission point is:	Reason for position	The decision we want Council to make:
Sites and Areas of Significance to Maori					
210.13	Waimakariri Irrigation Ltd	SASM-P5	Support	Enables operational efficiency.	Allow the submission point in full.
210.6	Waimakariri Irrigation Ltd	Policies - general	Support	This type of situation needs to be recognised.	Allow the submission point in full.
Ecosystems and Indigenous Biodiversity					
122.16	Canterbury Botanical Society	ECO-R4	Oppose	This amendment would be impractical and difficult to apply. It is difficult to determine exactly where water will land at any one time because a variety of things, such as wind, will affect this.	Disallow the submission point in full.
130.2	Emily Arthur-Moore	ECO-R2	Oppose	It would be almost impossible to do with any degree of accuracy.	Disallow the submission point in full.
192.49	Royal Forest and Bird Protection Society of NZ	ECO-R1	Oppose	Federated Farmers supports the notified version with our requested amendments.	Disallow the submission point in full.
192.50	Royal Forest and Bird Protection Society of NZ	ECO-R2	Oppose	Federated Farmers supports the notified version with our requested amendments.	Disallow the submission point in full.
192.51	Royal Forest and Bird Protection Society of NZ	ECO-R3	Oppose	Federated Farmers supports the notified version. Unclear about the purpose for the requested amendment.	Disallow the submission point in full.

Sub No.	Submitter Name	Section	Our position on this submission point is:	Reason for position	The decision we want Council to make:
192.52	Royal Forest and Bird Protection Society of NZ	ECO-R4	Oppose	Federated Farmers supports the notified version with our requested amendments. We do not support application of the rule to unmapped SNAs. How can an irrigator comply if the SNA s not mapped?	Disallow the submission point in full.
192.55	Royal Forest and Bird Protection Society of NZ	ECO-R7	Oppose	Federated Farmers requested deletion of the rule (which remains our strong preference. Failing that we oppose its application to unmapped SNAs. It is difficult to imagine how the rule could be applied in the absence of mapping.	Disallow the submission point in full.
295.93	Horticulture New Zealand	ECO-R1	Support	The scenario presented is a compelling reason for vegetation clearance.	Allow the submission point in full.
295.94	Horticulture New Zealand	ECO-R2	Support	The scenario presented is a compelling reason for vegetation clearance.	Allow the submission point in full.
362.6	North Canterbury Fish and Game Council	ECO-R1	Oppose	The plan and its rules need to apply the district as it currently is. The mapping of SNA's is a separate issue.	Disallow the submission point in full.
362.11	North Canterbury Fish and Game Council	ECO-R2	Oppose	A mapped pasture approach would be almost impossible to implement with any degree of accuracy or consistency.	Disallow the submission point in full.
419.89	Department of Conservation	ECO-R4	Oppose	FFNZ is opposed to the requested increase in setback for irrigation and its application to unmapped SNA's	Disallow the submission point in full.

Sub No.	Submitter Name	Section	Our position on this submission point is:	Reason for position	The decision we want Council to make:
419.90	Department of Conservation	ECO-R7	Oppose	FFNZ is opposed to the application of the rule to unmapped SNA's because it would be difficult to apply the rule in the absence of mapping.	Disallow the submission point in full.
420.9	Dairy Holdings	ECO-R1	Support	Discretionary activity status is more appropriate than non-complying, given the lack of precision around the application of vegetation clearance rules.	Allow the submission point in full
362.9	North Canterbury Fish and Game Council	General	Oppose	A policy enforcing mapping and scheduling of SNA's is unlikely to be successful or effective in protecting SNA values.	Disallow the submission point in full.
192.40	Royal Forest and Bird Protection Society of NZ	Introduction	Oppose	The requested wording is complex and difficult to follow – not really suitable for an introduction. We are opposed to the use of "unmapped SNA's".	Disallow the submission point in full.
192.57	Royal Forest and Bird Protection Society of NZ	ECO-MD2	Oppose	The requested additional words do not add meaning.	Disallow the submission point in full.
192.41	Royal Forest and Bird Protection Society of NZ	ECO-O1	Oppose	FFNZ supports the wording requested in its submission.	Disallow the submission point in full.
192.43	Royal Forest and Bird Protection Society of NZ	ECO-P2	Oppose	The requested wording is complex and difficult to follow – not suitable for an effective policy. FFNZ supports the	Disallow the submission point in full.

Sub No.	Submitter Name	Section	Our position on this submission point is:	Reason for position	The decision we want Council to make:
				notified policy with its requested amendments.	
192.44	Royal Forest and Bird Protection Society of NZ	Introduction	Oppose	FFNZ supports the notified rule with its requested amendment. Again it is too complex and difficult to follow.	Disallow the submission point in full.
192.46	Royal Forest and Bird Protection Society of NZ	ECO-P5	Oppose	FFNZ supports the notified policy with its requested amendments.	Disallow the submission point in full.
192.47	Royal Forest and Bird Protection Society of NZ	ECO-P7	Oppose	FFNZ supports the notified policy with its requested amendments.	Disallow the submission point in full.
210.18	Waimakariri Irrigation Ltd	ECO-P1	Support	Reflects reality and enables operational efficiency.	Allow the submission point in full.
210.20	Waimakariri Irrigation Ltd	ECO-P5	Support	Biodiversity offsets need to be considered in the circumstances described.	Allow the submission point in full.
362.2	North Canterbury Fish and Game Council	ECO-P4	Oppose	A mapped pasture approach would be almost impossible to implement with any degree of accuracy or consistency.	Disallow the submission point in full.
Natural Character					
210.33	Waimakariri Irrigation Ltd	NATC-S1	Support	For the reasons given by the original submitter.	Allow the submission point in full.

Sub No.	Submitter Name	Section	Our position on this submission point is:	Reason for position	The decision we want Council to make:
192.72	Royal Forest and Bird Protection Society of NZ	NATC-AN1 (should be NATC-AN2?)	Oppose	FFNZ is opposed to the deletion of "any ephemeral flow path where there is no defined channel". The notified version makes practical sense.	Disallow the submission point in full.
192.63	Royal Forest and Bird Protection Society of NZ	General	Oppose	The requested relief is not explicit and, therefore, difficult to respond to. FFNZ opposes the notion that rules should apply unscheduled natural character freshwater bodies.	Disallow the submission point in full.
249.153	Resource Management Group Ltd	NATC-MD4	Support	The requested relief would support the effective operation of critical infrastructure.	Allow the submission point in full.
249.154	Resource Management Group Ltd	NATC-MD5	Support	The requested relief would support the effective operation of critical infrastructure.	Allow the submission point in full.
420.21	Dairy Holdings	NATC-MD6	Support	Very important aspect to consider.	Allow the submission point in full.
210.25	Waimakariri Irrigation Ltd	NATC-O1	Support	It is almost impossible to truly "preserve" anything. Change is inevitable. However, we can "protect" e.g. by applying protective mechanisms and appropriate constraints on activities.	Allow the submission point in full.
210.26	Waimakariri Irrigation Ltd	ECO-O2	Support	A reasonableness test is appropriate.	Allow the submission point in full.
210.27	Waimakariri Irrigation Ltd	NAT-O3	Support	As argued above, the word "preserve" is problematic (probably impossible to achieve).	Allow the submission point in full.

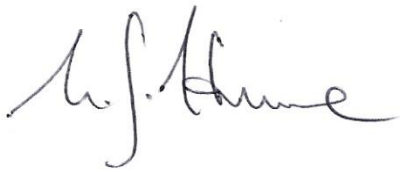
Sub No.	Submitter Name	Section	Our position on this submission point is:	Reason for position	The decision we want Council to make:
210.29	Waimakariri Irrigation Ltd	NATC-P3	Support	Requested wording better expresses the essence of the policy.	Allow the submission point in full.
419.109	Department of Conservation	NATC-P6	Oppose	FFNZ supports the notified policy, with the addition of a context statement.	Disallow the submission point in full.
420.17	Dairy Holdings	NATC-P2	Support	Very important aspect to include in the policy.	Allow the submission point in full.
420.18	Dairy Holdings	NATC-P3	Support	The affects are key, not the list of possible ways that effects might be manifest.	Allow the submission point in full.
Natural Features and Landscapes					
192.74	Royal Forest and Bird Protection Society of NZ	NFL-P1	Oppose	Oppose extra words for something that is already covered.	Disallow the submission point in full.
in full210.37	Waimakariri Irrigation Ltd	NFL-P1	Support	The practicality test is appropriate.	Allow the submission point in full.
210.40	Waimakariri Irrigation Ltd	General	Support	Essential to recognise this at a policy level.	Allow the submission point in full.
362.5	North Canterbury Fish and Game Council	NFL-P3	Oppose	Oppose the premature inclusion of Lees Valley as an outstanding landscape. Support the notified version with amendment requested by FFNZ.	Disallow the submission point in full.
362.7	North Canterbury Fish	NFL-P3	Oppose	Vegetation clearance is covered elsewhere in the plan.	Disallow the submission point in full.

Sub No.	Submitter Name	Section	Our position on this submission point is:	Reason for position	The decision we want Council to make:
	and Game Council				
Subdivision					
295.100	Horticulture New Zealand	SUB-MCD10	Support	Reinforces the importance of considering reverse sensitivity effects and the potential loss of high value soils.	Allow the submission point in full.
295.99	Horticulture New Zealand	General	Support	Support recognition of the importance of high value soils, at the policy level.	Allow the submission point in full.
Earthworks					
210.49	Waimakariri Irrigation Ltd	EW-R1	Support	Important matter to include.	Allow the submission point in full.
210.50	Waimakariri Irrigation Ltd	EW-R3	Support	Key group to include.	Allow the submission point in full.
210.51	Waimakariri Irrigation Ltd	EW-R5	Support	Important matter to include.	Allow the submission point in full.
210.54	Waimakariri Irrigation Ltd	EW-S1	Support	Important matter to include. Support in addition to our original submission.	Allow the submission point in full.
210.55	Waimakariri Irrigation Ltd	EW-S2	Support	Important matter to include.	Allow the submission point in full.
Light					
169.27	NZPork	LIGHT-S1	Support	For the reasons given by the original submitter.	Allow the submission point in full.

Sub No.	Submitter Name	Section	Our position on this submission point is:	Reason for position	The decision we want Council to make:
169.28	NZPork	LIGHT-S2	Support	For the reasons given by the original submitter.	Allow the submission point.
Noise					
169.29	NZPork	Introduction	Support	For the reasons given by the original submitter.	Allow the submission point in full.
295.109	Horticulture New Zealand	Introduction	Support	For the reasons given by the original submitter.	Allow the submission point in full.
295.111	Horticulture New Zealand	NOISE-O1	Support	For the reasons given by the original submitter.	Allow the submission point in full.
Rural Zone					
169.34	NZPork	Introduction	Support	For the reasons given by the original submitter.	Allow the submission point in full.
295.121	Horticulture New Zealand	Introduction	Support	For the reasons given by the original submitter.	Allow the submission point in full.
General Rural Zone					
295.132	Horticulture New Zealand	Introduction	Support	For the reasons given by the original submitter.	Allow the submission point in full.

Conclusion

Federated Farmers thanks the Waimakariri District Council for the opportunity to lodge a further submission on the Proposed Waimakariri District Plan. We look forward to ongoing dialogue about the district plan review and we remain committed to working constructively with Council.



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