



**FEDERATED  
FARMERS**  
OF NEW ZEALAND

---

**WEST COAST**

# **Submission on FEEDBACK ON Te Tai o Poutini Plan**

---

**West Coast Federated Farmers**

11 November 2022



## **FEEDBACK ON Te Tai o Poutini Plan**

Name of submitter: Federated Farmers of New Zealand

Contact: Eleanor Linscott, Regional Policy Manager - Southern  
Bede O'Connor, President West Coast Federated Farmers

Address for service: Federated Farmers of New Zealand  
PO Box 5242  
Dunedin 9058  
New Zealand

This is a submission on the notified Te Tai o Poutini Plan.

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

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

We wish to be heard in support of our submission.

## **Introduction**

1. The West Coast province of Federated Farmers of New Zealand (WCFF) appreciates the opportunity to submit on the notified Te Tai o Poutini Plan (TTPP).
2. Federated Farmers has a strong membership base in the West Coast District. These are a mixture of dairy, beef and lamb, lifestyle and young farmer memberships. Beef farming is a significant contributor to the Westland District economy, particularly in the southern parts of the district.
3. The economic importance of the agricultural sector to New Zealand's economy is well established and recognised. The Dairy Cattle Farming industry is the largest employer in West Coast, comprising 6 per cent of all employees. The top industry (by number of self-employed workers) in West Coast is Dairy Cattle Farming (400 self-employed), followed by employment services and accommodation (200 self-employed each)<sup>1</sup>.
4. This submission was developed in consultation with the members and policy staff of Federated Farmers of New Zealand. It is important that this submission is not viewed as a single submission, but as a collective one, representing opinions and views of our members.
5. With regard to ensuring that primary production is provided for on the West Coast, WCFF submits that there are some provisions in the proposed TTPP that must be amended in order to promote the same.
6. This will ensure that the ongoing and existing use of rural land for primary production is appropriately acknowledged and enabled in the District planning framework.
7. Federated Farmers are submitting on several provisions, with a focus on Historical and Cultural Values, Natural Environment Values and Rural Zones.

## **Significant Natural Areas**

8. The ECO provisions and their application are of concern to WCFF. The fact that the SNAs have not been assessed and mapped across all the regions has imposed confusion and uncertainty on some landowners. The proposed plan includes an Objective to say that this mapping exercise will be completed by 2027, but WCFF's

---

<sup>1</sup> <https://www.mbie.govt.nz/dmsdocument/11457-regional-factsheet-west-coast-pdf>

concern is that this process going forward needs to be clear and fair for those areas that have not been mapped.

9. There is some concern for unmapped areas that there is onus on the landowner to prove that their land is not an SNA – ie an almost quasi presumption that the land is an SNA. This means until the landowner discharges this presumption, there will be restrictions placed on the land that do not manage any adverse effect on the environment.
10. The SNA presumption applies where those landowners do not meet the narrow permitted activity standards. It means the landowner will need to apply for a resource consent to carry out the activity. As a part of this resource consent, the landowner must assess the biodiversity against the criteria in the WCRPS to determine whether or not it should be defined as a SNA. This appears to be the same exercise that the councils should be carrying out and in fact in their own budgets have anticipated.
11. This approach is not consistent with the WCRPS, nor is it just for the landowner to shoulder the time and cost in completing an assessment
12. There is uncertainty as to how this assessment is to be carried out in the future – will this be to the criteria set out in the WCRPS as per the already mapped SNAs – or will the assessment need to be done in accordance with the soon to be released NPS-IB, therefore creating a two tier SNA system on the West Coast.

#### **Sites and Areas of Significance to Māori**

13. Notwithstanding WCFF are supportive of the recognition and inclusion of these sites in the TTPP the communication from the Committee to impacted landowners raised concerns in terms of the engagement with landowners of the SASM.
14. Whilst many landowners may have already been aware of these important heritage sites, many were not – and the letter from the Committee was the first time many had any knowledge of the sites on their property. There was little communication regarding the changes that would be made with the TTPP prior to its notification.

15. Federated Farmers believes that information sessions with the Committee and Poutini Ngāi Tahu would have been a more engaging and useful first step to explaining the heritage values and building relationships. Going forward with this process ongoing engagement with all parties will be helpful to provide clarity and understanding.

16. West Coast farmers have a deep respect for the land and the history associated with it. Federated Farmers acknowledges the heritage values of the sites identified in the TTPP and are keen to build a relationship with Poutini Ngāi Tahu to work together in understanding the values and also how they can be appropriately protected.

**Specific Comment**

17. The following pages provide detail regarding specific comment on provisions.

## 2. Specific comments

### 2.1 Part 1 – Introduction and General Provisions - Te Wāhanga 1 - Te Whakataki me Ngā Kōrero Whānui

Provision	Position	Reason	Relief sought
<b>Introduction</b>			
Description of the Districts - Te Whakamāramatanga o ngā Rohe	Support	Recognises and describes the significance of agriculture/primary production to the West Coast.	Retain as notified.
<b>Definitions - Ngā Tautuhinga</b>			
Agricultural, pastoral and horticultural activities	Oppose in part	While the definition is an accurate description of the activities associated with farming it is noted that the term rural production is used in many places throughout the Plan. This is confusing and there should be consistency and clarity in the usage of terms. WCFF seeks that the description in the definition for agricultural, pastoral, horticultural activities is retained but renamed 'rural production activities' and the term rural production used consistently throughout the plan. Separate rules are provided for intensive indoor primary production so the activity should be included as part of rural production activities.	Amend title of definition to 'rural production activities'. Amend references in plan to agricultural, pastoral, horticultural activities be amended to rural production activities. Delete exclusion of intensive indoor primary production from a)
Area of significant indigenous biodiversity		The definition applies only in relation to subdivision rules but the term significant indigenous biodiversity (SIB) is used in other sections of the Plan. Therefore the use of the defined term may be confusing. It is accepted that when undertaking a subdivision SIB will need to be identified and until such time as the council undertakes the necessary identification the identification in the definition applying for subdivision rules will be necessary.	Retain as notified. Include a definition for significant indigenous biodiversity
Conservation activities	Support in part	Conservation activities includes weed and pest control and this should be specifically included as part of conservation activities. It is important to farmers that such weed and pest control is undertaken.	Amend the second sentence of the definition of Conservation Activity:  It includes ancillary activities which assist to enhance the public's appreciation and recreational enjoyment of the resource, <u>including weed and pest control.</u>
Critical infrastructure	Support in Part	This definition needs improvement as it is not an exhaustive list and therefore the category needs explanation.	Amend as follows:  means those necessary facilities, services, and installations which are critical or of

			significance to either the West Coast or New Zealand. This may include but is not limited to rail network, state highways, special purpose roads, airports, wastewater, reticulated water and stormwater plants, defence facilities, telecommunications networks and electricity generation, transmission and distribution assets.
Existing use rights	Support in Part	The definition of existing use rights is a summarised version of section 10 of the RMA. Existing use rights under the Act should not be limited by the definition in the Plan.	Either include the definition of existing use rights from section 10 of the RMA or remove the definition as a whole.
Farm quarry	Support in Part	On the whole, we support the definition, however it is not practical to require that a farm quarry can only serve farm activities that occur on the <b>same site</b> . The term site is defined in the National Planning Standards and the Plan as meaning as single record of title. Many farms will have a number of titles and it is not practical that a farm quarry use is limited to only the title on which it exists, rather than the full property or operation. Most farm quarries would serve rural production activities across the farm.	Amend the definition of farm quarry as follows: Means an open pit or excavation from which quantities of soil, stone, gravel or mineral is extracted for farming activities <del>on the same site</del>
Heritage Professional	Oppose	These requirements are too onerous. The matter is best addressed in the rules for historic heritage.  The Plan also refers to an assessment by a Heritage Architect in HH-R2. It is not clear whether this is the same as a heritage professional.	Delete definition of heritage professional  Amend HH-R2 to refer to suitably qualified heritage professional
Improved pasture	New	WCFF seek amendments to the indigenous vegetation clearance rules based on the existence of improved pasture where some indigenous species may exist amongst the pasture. Therefore a definition for improved pasture is sought, suggest inclusion of the definition set out in the NPS-FM.	Include a definition for improved pasture as follows: means an area of land where exotic pasture species have been deliberately sown or maintained for the purpose of pasture production, and species composition and growth has been modified and is being managed for livestock grazing
Indigenous vegetation clearance	Support in part	As drafted, the definition does not provide for grazing as it includes 'clearing or removal of indigenous vegetation by any means'. Farmers graze in and around areas of indigenous vegetation or indigenous vegetation may be scattered amongst pasture which may result in some of the indigenous vegetation being "cleared" pursuant to the current proposed definition.	Add additional clarification on improved pasture.  means the clearing or removal of indigenous vegetation by any means, including cutting, crushing, cultivation, irrigation, chemical application, drainage, stop-banking, overplanting, or burning. <u>It does not include</u>

		Indigenous vegetation and grazing can co-exist and is often considered good management practice in terms of fire protection and assist with regeneration.	<u>the grazing of pasture or improved pasture species in that area of indigenous vegetation.</u>
Lawfully established	Support in Part	The definition for existing use rights refers to lawfully established activities, therefore it is confusing and also incorrect to then state that lawfully established activities includes activities permitted...by an existing use right. The definition can be restructured to make it clear that lawfully established can be achieved by a number of ways, which are independent of each other.	Amend definition for lawfully established as follows: means activities provided for by one of the following: 1. Permitted through a rule in a plan, or 2. Through a resource consent, or 3. In a national environmental standard; or 4. By an existing use right (as provided for in Section 10 of the RMA) In the case of mineral extraction it also includes an activity permitted through a Coal Mining Licence issued under the Coal Mines Act (1979).
Minor residential unit	Support	The notified definition follows the National Planning Standards.	Adopt as notified.
Noise	Support	The notified definition follows the National Planning Standards.	Adopt as notified.
Notional boundary	Support	The notified definition follows the National Planning Standards.	Adopt as notified.
Reverse sensitivity	Support	Support the inclusion of this definition. However it would be better to rely on the definition of 'lawfully established' in the Plan rather than using 'approved, existing or permitted activity'.	Amend definition of reverse sensitivity: Means the potential for a lawfully established activity to be compromised or constrained by the more recent establishment or alteration of another activity which may be sensitive to the actual, potential or perceived environmental effects generated by the lawfully established activity.
Riparian margin	Support in part	Federated Farmers are concerned about how these distances are applied in the Natural Character provisions. If changes are not made to the rules, then Federated Farmers seeks that the distances are reduced to ensure that farming activities can continue	Changes are sought to the activities within these distances in the Natural Character rules. If changes are not made to the rules, then Federated Farmers seeks that the distances are reduced to ensure that farming activities can continue.
River	Support	The notified definition follows the National Planning Standards.	Adopt as notified.
Rural industry	Support	The notified definition follows the National Planning Standards.	Adopt as notified.



Sign	Support	The notified definition follows the National Planning Standards.	Adopt as notified.
Significant natural area	Support	This definition refers to the criteria set out in the WC RPS to identify what is an SNA. There is a definition for significant natural area in the RPS which is slightly different. The definition should be the same as the RPS. In particular an SNA is an area identified using the criteria in the RPS AND included in maps in a regional or district plan as an SNA.	Amend the definition of significant natural area as in the RPS: Means: 1. an area of significant indigenous vegetation, and /or significant habitats of indigenous fauna which has been identified using the criteria listed in Appendix 1 or 2 of the RPS and included on maps in a regional or district plans as a SNA; or 2. An area which although not included as a SNA in a regional or district plan nevertheless meets one or more of those criteria listed in Appendix 1 or 2 of the RPS.
Sensitive activity	Support	Identification of sensitive activities such as residential activities and educational facilities is appropriate.	Adopt as notified.
Significant Electricity Distribution line	Oppose in part	A significant electricity distribution line is any line greater than 33kV. This would include many lines within the West Coast. It would be better to focus on key SEDL's.	Amend to voltage of 66kV or greater,
Waterbody	Support	The notified definition follows the National Planning Standards.	Adopt as notified.
Wetland	Support	The notified definition follows the National Planning Standards.	Adopt as notified.
Quarrying	New definition	Quarrying is referred to in the rules and a definition is required to differentiate with farm quarry	Add definition for quarrying: means a location or area used for the permanent removal and extraction of aggregates (clay, silt, rock or sand). It includes the area of aggregate resource and surrounding land associated with the operation of a quarry and which is used for quarrying activities.  This does not include a farm quarry.
Highly productive land	New definition	The plan refers to highly productive land but the term is not defined. The NPSHPL has now been released. A definition is sought consistent with the definition in the Draft NPSHPL.  The plan also refers to versatile soils. There should be consistency in usage of terms.	Include a new definition for highly productive land: Until the regional policy statement contains maps identifying highly productive land in the West Coast, highly productive land is: LUC 1, 2, or 3 land which is zone general rural or rural production and is not identified for future urban development.

			Amend all uses of 'versatile soil' to 'highly productive land.'
--	--	--	---

**2.2 Part 2 – District-Wide Matters- Te Wāhanga 2 - Ngā Kaupapa ā-Rohe Whānui**

Provision	Position	Reason	Relief sought
<b>Strategic Directions Overview Te Tirohanga Whānui ki ngā Ahunga Rautaki</b>			
Agriculture - Te Ahuwhenua AG01; AG02	Support in Part	<p>Whilst these objectives do recognise the significance of agriculture to the West Coast, these could be reworded for readability and recognition.</p> <p>The overarching recognition should stand alone as an objective, rather than be included with support industries as is.</p> <p>There is no definition for versatile soils in the plan and it is considered that the term highly productive land should be used to be consistent with the recently released NPSHPL.</p>	<p>Replace with:</p> <p>AG- O1 The significance of agriculture to the WC community is recognised and provided for.</p> <p>AG-O2 The productive value of highly productive land and agricultural land is maintained for current and future agricultural and horticultural uses.</p> <p>AG-O3 Agricultural development and innovation is provided for including enabling the rural support industries and services to maintain agricultural viability</p> <p>Add a definition for highly productive land</p>
Connections and Resilience - Ngā Hononga me te Manawa Titi	Support	This suite of objectives recognises the connections and resilience that the WC needs and relies on during its adverse weather events.	Adopt as notified.
Natural Environment - Te Taiao NENV-01	Support in Part	<p>NENV-O1 seeks to protect a range of features. To be consistent with s6 of the RMA the focus should be on 'outstanding' natural features and landscapes and 'significant' indigenous biodiversity</p> <p>Also, the protection is from 'inappropriate subdivision use and development' – not protection per se.</p>	<p>Amend NENV-01:</p> <p>The natural features that contribute to the West Coast's character and identity and Poutini Ngai Tahu's cultural and spiritual values are recognised by preserving natural character, protecting outstanding natural features and landscapes and significant indigenous biodiversity from inappropriate subdivision use and development</p>

Natural Environment - Te Taiao NENV-03	Support in Part	WCFF supports this suite of objectives recognising the importance of the natural environment of Te Tai o Poutini, however existing activities within these environments need to be recognised, just as infrastructure is in NENV-03. Add c. there are existing lawfully established activities in the natural environment.	Reword NENV-03:  To recognise: a. The substantial contribution to the protection of natural environment values that is made by the existence of public conservation land in protecting significant areas, habitats and features; b. The need for infrastructure to sometimes be located in significant areas; <del>and</del> c. <u>There are existing lawfully established activities located in significant areas; and</u> <u>d.</u> The need to support the ethic of stewardship and to consider the positive effects of the conservation estate in achieving the requirements of the RMA.
Poutini Ngāi Tahu POU – P5	Support in Part	Support the recognition of Poutini Ngāi Tahu and their relationship with the West Coast. POU-P5 appears to promote overriding of private property rights. WCFF recognises the importance and significance of mahinga kai sites to Poutini Ngāi Tahu but it needs to be emphasised that where these sites are on private land or access is across private land, access can only be via prior discussion and agreement from the landowner. Farms have a range of activities occurring on them that pose health and safety requirements to people in the vicinity, farms also contain multiple hazards, and there are also animal welfare concerns.	Amend to reference landowner engagement.
POU-P10	Support in Part	Agree with the sentiment of this policy, however it should be reworded as recognise rather than protect. Section 6 of the RMA requires recognition and provision for matters of national importance.	Reword as follows:  <u>Recognise</u> <del>Protect</del> Poutini Ngai Tahu taonga and cultural sites, including sites and areas of significance to Maori identified in Schedule Three while ensuring Poutini Ngai Tahu’s key role in decision making around their management.
<b>EIT - Energy, Infrastructure, and Transport - Te Pūngao, Te Tūāhanga, me Te Tūnuku</b>			
ENG-03	Support in part	The focus on providing for energy activities should be that they are not compromised by adverse effects of incompatible subdivision and development – rather than a ‘protection’.	Amend ENG-03 To provide for the development, operation, maintenance and upgrade of energy activities and ensure that they are not compromised by the adverse effects of incompatible subdivision, use and development.

ENG-O4	Support		A policy to recognise and provide for the National Grid is consistent with the NPS-ET.	Retain ENG-O4
ENG-P3	Support in part		The focus on providing for energy activities should be that they are not compromised by adverse effects of incompatible subdivision and development – rather than a ‘protection’.	Amend ENG-P3 Minimise reverse sensitivity effects from subdivision, use and development on energy activities and ensure that ensure that the ongoing operation, maintenance, upgrade or development is not compromised.
ENG-P9	Support in part		The NPS-ET Policy 10 seeks that reverse sensitivity effects are avoided to the extent reasonably possible.	Amend ENG-P10 e) Avoid, to the extent reasonably possible potential for reverse sensitivity effects on the National Grid
ENG-R6	Support in part		NZEC34:2001 provides the basis for provisions around significant electricity distribution lines which are any lines of 33kv or greater. The provisions in the plan should align with NZEC34 which vary according to voltage and span. The provisions in ENG-R6 set an arbitrary setback distance of 12metres which does not align with NZEC34:2001.	Amend ENG-R6 by deleting 4) and relying on clause 5) which applies the distances in NZEC34:2001.
ENG-R19	Oppose in part		Activities in and around SETL should not be non-complying if the PA standards are not met. These should be Restricted Discretionary where the standards in NZEC34:2001 are not met.	Amend ENG-R19 by deleting significant Electricity Distribution Lines and include as a Restricted Discretionary activity.
<b>HAZ - Hazards and Risks - Ngā Pūmate me ngā Mōrea</b>				
HS-O1	Support		The approach to hazardous substances is supported, with a focus on major hazard facilities.	Retain HS-O1
HS-P2	Support in part		Major hazard facilities is not defined and it needs to be clear what are considered to be such facilities. The Health and Safety at Work Major hazardous facilities Regulations 2016 provide a framework for assessing such facilities.	Include a definition for major hazard facilities: Any facility deemed a Major Hazardous Facility under the Health and Safety at Work Major Hazardous Facilities Regulations 2016
NH-O1	Support in Part		The West Coast is a very diverse landscape and environment, and we question whether it is possible to have a “regionally consistent” approach. We support the risk-based approach however our members advise that an approach in Hokitika will not be relevant down in Haast and therefore the approach should be risk based and be designed for that specific environment.	Reword NH-O1: <u>A risk based approach for managing natural hazard risk is used for new subdivision, use and development.</u>



NH-03	Support in Part	There needs to be a requirement for new critical infrastructure with regard to design and its durability to ensure its durability in an event.	Amend NH-03 To only locate critical infrastructure within areas of significant natural hazard risk where there is no reasonable alternative, and to design infrastructure so as not to exacerbate natural hazard risk to people and property <u>and is designed to maintain integrity and ongoing function during and after natural hazards</u>
NH-P7	Support	Policy NH-P7 provides for unoccupied structures and buildings within the Earthquake Hazard Overlay. Farms often have unoccupied buildings and structures that do not pose as high a risk as occupied buildings.	Retain NH-P7 as notified
NH - rules		There should be provision for unoccupied farm buildings in natural hazard areas as these have a lower risk than occupied buildings	There should be provision for unoccupied farm buildings in natural hazard areas as these have a lower risk than occupied buildings
<b>HCV - Historical and Cultural Values - Ngā Uara ā-Ahurea, ā-Hītori Hoki</b>			
<b>Historic Heritage Ngā Tuku Ihotanga</b>			
HH-R3	Support in Part	Installing fence posts and replacing poles for overhead network utility lines is permitted as is maintenance of roads, tracks and accessways. Farm fencing should also be considered permitted as the effects of such activities would be similar.	Reword HH-R3 1d and 1e as follows: d. Installing fence posts provided that the area of land disturbed is limited to what is necessary to maintain an existing fence or line along its existing alignment; e. the replacement of poles for overhead network utility lines provided that the activity does not involve installation or digging of new holes for overhead network utility lines; or ...
		Not all heritage items listed in Schedule One are recognised for archaeological value. Archaeological Authorities are required pursuant to the HNZPT Act for activities that seek to modify or destroy an archaeological site. It is not appropriate to require an Archaeological Authority for any and all works affecting an area or site identified in Schedule One. Not only does this add more time and money to the landowner, it will also produce more work for the HNZPT archaeologists processing Authorities. If an Authority is required then it is set out in legislation rather than a provision of this Plan.	Delete HH-R3(2). of this rule.

Rules HH-R4,HH-R6		These rules refer to suitably qualified heritage professional. Heritage professional is defined, but as noted earlier, the definition is not appropriate. Suggest deletion of the definition and retain the qualifier in each rule to “suitably qualified”	Delete definition for “heritage professional” and replace in chapter as per wording used in these rules: <u>suitably qualified heritage professional.</u>
Schedule 1B	Oppose	There are no rules associated with this Schedule. Further it is not a complete list of archaeological sites on the West Coast. As works associated with archaeological sites are managed pursuant to the HNZPTA this will only confuse a Plan user.	Remove this Schedule
<b>SASM Sites and Areas of Significance to Māori - Ngā Wāhi Tāpua ki te Māori</b>			
SASM-02	Support in Part	Federated Farmers supports the intentions behind the objective. As we understand from schedule 3 none of the land is on private land apart from Poutini Ngai Tahu land, but access to some of the actual sites would require crossing of private land to get to the site. Federated Farmers concern here would be how this objective could potentially be applied if extended to private land. All farms have strict health and safety requirements and animal welfare considerations. Farms also may have fenced off waterways and have riparian plantings. Farms are also sites of multiple potential hazards. Any access to private land needs to be via engagement and agreement with landowners.	Amend SASM-02 to ensure that where sites are on private property access is required from the landowner.
SASM-P2	Support in part	The values that are set out in Schedule Three and referred to in the policy have no explanation. It would assist plan users, especially those with a SASM identified on their property, to understand what the “identified values” are and their significance to Poutini Ngāi Tahu. For example a property with the identified value “kainga sites” requires further explanation. Further, where the SASM is shown on the planning maps as a large area encompassing entire blocks of land – does this mean there is value associated with the entire block, or are there better defined/identified/mapped areas to assist the landowner to understand the activities that have occurred on the land and the values that are seeking to be protected, and therefore where and why there are sites to protect and/or avoid.	Add explanation and clarification for these values and sites.

SASM-P4	Support	This policy recognises that there needs to be an arrangement with the landowner as a party before private land is accessed. We support council taking a facilitative approach that recognises landowner concerns and the practical issues with access while recognizing the concerns of Poutini Ngāi Tahu	Retain as notified.
SASM-P13	Support	Recognises that animal grazing can be an appropriate activity	Retain as notified.
SASM-R1	Support	Recognises that grazing of animals is an appropriate activity within most sites of significance to Māori.	Retain as notified.
SASM- R2	Support in Part	This rule could be clearer if the fence posts and replacement of poles for network utility lines were separated.	Reword as follows: iii. Installing fence posts provided that a. The area of land disturbed is limited to what is necessary to maintain an existing fence or line along its existing alignment; iv. the replacement of poles for overhead network utility lines provided that a. The activity does not involve installation or digging of new holes for overhead network utility lines; or ... List sites in 2 i) as a list as in SASM-R4
SASM R3, 4, 5	Support	Recognises that these activities are appropriate	Retain as notified. List sites in SASM-R3 2 as a list as in SASM-R4
SASM R7		Heading and rule do not correlate, noting heading does not form part of the rule. Is this referring to farm quarrying in R7(3)?	This rule needs to be clearer. Although the heading says farm quarry, the body of the rule references quarrying only (R7 (3)).
SASM -R16		Shelter belts are a common practice on farm and provide on farm benefits in terms of animal welfare, seasonal food and shelter for indigenous fauna. Shelter belts are smaller than plantation forestry so should not be captured by this rule.	Remove 'shelter belts' from SASM-R16
SASM-R17	Oppose in part	The rule includes hazardous facilities but these are not defined. A definition for major hazard facility is sought in relation to the hazardous substances provisions. SASM-R17 should refer to major hazard facilities.	Amend SASM-R17 by deleting hazardous facilities and replacing with 'major hazard facility' and define as sought above.
<b>Natural Environment Values - Ngā Uara Taiao Aotūroa</b>			

Ecosystems and Indigenous Biodiversity	Oppose	<p>This schedule should contain all areas meeting the RPS criteria for SNA's. Not just those in Grey District. Because of this, there is uncertainty and additional costs imposed on landowners in Westland and Buller who wish to clear indigenous vegetation, especially where needed for farm and pasture maintenance.</p> <p>Where Significant Natural Areas have not yet been mapped, Te Tai o Poutini Plan has general vegetation clearance rules, with an expectation that an assessment against the regionally consistent significance criteria will be undertaken at the time of any resource consent. This means the onus and cost is on the landowner to carry out such an assessment which is inconsistent with the RPS which requires the Council's to do the assessment and subsequent mapping.</p> <p>As is, without the SNAs in all districts assessed and mapped, these provisions are not consistent with the RPS. The RPS states "It is intended that SNAs will be identified and mapped in the preparation of district and regional plans".</p> <p>The RMA requires Councils, when exercising its duties to recognise and provide for the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna, as a matter of national importance. The rules as drafted currently apply beyond areas of SNA as per the criteria set in the RPS.</p> <p>The Draft NPS-IB provides for maintenance of improved pasture where it may affect an SNA. WCFF seeks a similar approach in the areas where identification of SNA's has not been undertaken.</p>	<p>That the onus of mapping is a council cost – not a burden covered by the ratepayer.</p> <p>That the plan include exclusions for indigenous vegetation clearance for farm and pasture maintenance.</p>
ECO-O2	Support	<p>Providing for appropriate subdivision use and development within SNA's is supported.</p>	<p>Adopt as notified</p>
ECO-P1	Oppose	<p>As addressed above for this chapter on Ecosystems and Indigenous Biodiversity, while this process described will identify the SNAs on the West Coast, we question the methods proposed.</p> <p>For example, is it for the landowner to complete an assessment at time of resource consent?</p> <p>WCFF are concerned with this process where, for example, if the mapping is not completed by June 2027.</p>	<p>That the onus of mapping is a council cost – not a burden covered by the ratepayer.</p> <p>That the plan include exclusions for indigenous vegetation clearance for farm and pasture maintenance.</p>

ECO-P2	Support in part	This recognises lawfully established activities, including existing use rights. This is important for the well-established farming activity that is occurring on the West Coast. There should be explicit provision for clearance of significant indigenous vegetation for farm and pasture maintenance	Amend ECO-P2 by adding: d) add 'or' to the end e) add 'or' to the end f) <u>necessary for farm and pasture maintenance</u>
ECO-P3	Support in part	More information is required with regard to a - "allowing additional subdivision rights". What does this mean and what potential effects on the environment will occur following such additional rights.	Amend ECO-P3 to include what additional subdivisions rights will be provided for.
ECO-P6		There is more explanation required with regard to c. How does a plan user find this list?	Provide more explanation in regard to ECO-P6(c)
ECO-P9		Offsets should be enabled where feasible and practical, and not be a requirement in all circumstances, as there may be circumstances where offsetting is likely to be neither practical or achievable.  'No net loss' and 'Net gain' is too difficult to quantify, and is unworkable as a method of compliance  'Best practice' is a nebulous and open-ended concept.	Amend policy as follows:  <del>Provide for Enable biodiversity offsets and compensation</del> to manage residual adverse effects of an activity where:  a. <del>The goal of the biodiversity offsets is no net loss and, preferably, a net gain of biodiversity;</del> b. The conservation outcomes <u>of biodiversity offsets</u> are measurable and positive; and c. <del>The biodiversity offsets or compensation are in accordance with best practice, including but not limited to NZ Government guidance on biodiversity offsetting.</del>



ECO--R1	Oppose in part	<p>WCFF support the clearance of indigenous vegetation and disturbance for the maintenance, operation and repair of lawfully established tracks, fences, structures and buildings as this would include farm tracks and fences. The list should also include drains as clearance of drains is necessary to avoid natural hazard risks and water lines which are necessary for animal health.</p> <p>It should also be clear that clause iv. People, property, structures or services includes animals.</p> <p>An additional clause is sought for the clearance of indigenous vegetation where necessary for biosecurity purposes under the Biosecurity Act 1993 such as removal of an unwanted organism.</p> <p>The restrictions in 5 for the Buller and Westland districts are too restrictive and place an unreasonable burden on farmers to maintain existing pasture for production purposes. The Draft NPS-IB provides for the maintenance of improved pasture where it may affect an SNA and WCFF seek a similar approach until such time as the SNA mapping by Buller and Westland district is included in the district plan.</p> <p>Maintaining existing pasture is important to achieve the strategic direction for agriculture on the West Coast.</p> <p>The Activity status where ECO-R1 (5) is not met is stated to be controlled or Restricted Discretionary depending on the activity type. The only applicable controlled activity rule is ECO-R3 where it is in accordance with an approved plan or permit issued under the Forests Act 1949. Therefore there is essentially no controlled activity rule if the restrictions for Buller and Westland are not met.</p> <p>ECO-R5 applies where the permitted or controlled activity standards are not met.</p>	<p>Amend ECO-R1:</p> <p>3 ii) maintenance, operation and repair of lawfully established tracks, fences, structures, buildings, <b>water lines, drains, critical infrastructure, network utilities, renewable electricity generation activation or natural hazard mitigation activities</b></p> <p>iv) To prevent a serious threat to people, <b>animals</b>, property, structures or services</p> <p>xiii) removal of vegetation for biosecurity purposes when directed under the Biosecurity Act 1993.</p> <p>Delete 5 i) and ii) Within Buller and Westland districts and replace with the following:</p> <p>i) indigenous vegetation clearance where it is within an area of improved pasture or crop and is for the purpose of cultivation or pasture maintenance and services to that pasture or crop</p> <p>ii) indigenous vegetation clearance under woodlots and shelterbelts planted for woodlot and shelter purposes</p> <p>Amend ECO-R5 to:</p> <p>Controlled activity</p> <p>Indigenous vegetation clearance not meeting permitted or controlled activity standards</p> <p>Amend matters of discretion to Matters of control</p>
ECO-R2	Support in part	<p>Provides for farm tracks and fences provided other conditions are met. There should also be provision for water lines, <u>drains and pasture maintenance.</u></p>	<p>Amend ECO-R2</p> <p>1 i) Walking / cycling tracks, roads, farm tracks, fences, water lines, <u>drains and pasture maintenance.</u></p>
ECO-R4/SUB-R7	Support	<p>Support the use of conservation covenants as a tool to protect significant indigenous biodiversity.</p>	<p>Retain as notified.</p>
ECO-R5	Oppose in part	<p>Changes are sought to ECO-R1 to provide for a controlled activity rule where the standards cannot be met.</p>	<p>Amend to a controlled activity rule</p>
<b>Natural Features and Landscapes - Ngā Āhua me ngā Horanuku Aotūroa</b>			
NFL-P1	Support	<p>Support the recognition of existing farming activities.</p>	<p>Retain as notified</p>

NFL-P3	Support	Support the recognition of farm activities within these landscapes and provision for these and new activities to be provided for.	Retain as notified.
NFL-R1	Support	Support this rule as it recognises and provides for the existing lawfully established activities.	Retain as notified.
NFL-R1	Support	Support the recognition of maintaining lawfully established buildings, drains, tracks, roads and fence lines, among other things.	Retain as notified.
NFL-R6	Support in part	The coast environment could contain pastoral land so should include a provision for earthworks to be included.	The coast environment could contain pastoral land so should include an allowance for earthworks to be included.
NFL-R8	Support	Retain as notified	Retain as notified
<b>Public Access - Te Āheinga Tūmatanui</b>			
PA-01	Support in Part	<p>WCFF supports the spirit of this Objective however it needs to include recognition that this access should not result in adverse effects on the natural character or cultural values of the areas or the rights of private property owners.</p> <p>Many rural landowners, particularly coastal or riparian margin landowners, have had encounters with unwelcome trespassers, some with dogs, that are disruptive to their farming operations, put themselves into dangerous situations, or create nuisance effects like littering or human waste.</p> <p>It may also be appropriate and legal to limit access across private property during certain periods – for example when this will be unsafe or will disrupt farming activities, such as when tree felling or earthmoving is occurring, or during harvest or lambing.</p>	<p>Reword as:</p> <p>Customary and public access to and along the coastal marine area, waterbodies and public resources is provided for, maintained and enhanced where the access does not create adverse effects on the natural character, indigenous biodiversity, cultural values or the rights and obligations of private property owners.</p>
<b>Natural Character and Margins of Waterbodies Ngā Āhua me ngā Mahi ka Noho Hāngāi ki ngā Hopua Wai</b>			
NC-01-03	Support	Support the provision for activities that need to locate in the margins of lakes, rivers and waterbodies.	Retain as notified.
NC- P2	Support in part	Support the provision of indigenous vegetation removal and earthworks in the margins of lakes, rivers and waterbodies. The setbacks are in the definition of riparian margin 10m from wetland, 20m from lake, 10m from river over 3m wide. Federated Farmers seek that a purpose for removal is also for farm or pasture maintenance.	Amend NC-P2 by adding: g) For purpose of farm or pasture maintenance
NC-P3	Support	Support the provision for buildings and structures within riparian margins of lakes, rivers and wetlands. A functional need is for a pump shed to locate within the margin.	Retain as notified.

NC-R1	Support in Part	Support recognition that fence lines may be in the riparian zone. However there also needs to be provision for farm or pasture maintenance within the riparian margin and also removal of vegetation for biosecurity purposes.	Amend NC-R1 to add: 1 k) farm and pasture maintenance 1 l) biosecurity purposes
NC-R2	Support in part	There should be provision for pump sheds which have a functional need to locate within the riparian margin.	Amend NC-R2: 1 h) pump sheds
<b>Subdivision - Te Wawaetanga</b>			
SUB-P1	Support in part	Whilst subdivision should be consistent with the qualities listed, it should also provide for the same. For example, with regard to highly productive land. Changes are sought to address these matters.	Amend: Enable subdivision that creates allotments that: a. Are consistent with <u>and provide for the purpose, character, and qualities of the applicable zone; ....</u> d. Protects significant cultural, historical, natural and ecological features sites and areas identified on the planning maps and in the Schedules in the Plan; <u>e. Recognises and protects areas of highly productive land; and ....</u>
SUB-P6	Support in part	Support a policy to prevent fragmentation in the rural zone. Subdivision should also avoid the potential for reverse sensitivity effects that can result.	Amend SUB-P6 g) That would create reverse sensitivity effects in the RURZ.

SUB – P9		<p>This policy should give effect to the provisions for requiring esplanade reserves in the RMA</p> <p>Protection of biodiversity values or of sites of significance to Maori etc are not within the purposes of Esplanade Reserves under section 229 of the RMA – so these clauses should be deleted.</p> <p>Where width greater than 20 metres is required, this should be with the consent of the subdividing landowner, as there is no mandatory requirement for taking an esplanade reserve or strip greater than 20 metres in width, and the excess land may have economic value for the landowner that should be taken into account.</p> <p>The location of the site being subdivided should weigh into consideration of waiving of the esplanade reserve requirement in this policy. If the site is isolated and there is no access to the esplanade reserve, it will be costly to maintain for weed and pest control, and maintenance of free flowing water bodies.</p>	<p>Amend Policy as follows:</p> <p>To require esplanade reserves or esplanade strips for allotments of less than 4 ha <del>to enable public access, reduce natural hazard risk, and contribute to the protection of natural character and biodiversity values for</del> <u>the purposes stated in section 229 of the Resource Management Act 1991</u>, except that the width of the esplanade reserve or strip may be varied from 20 metres or waived if:</p> <ul style="list-style-type: none"> <li>a. <del>The natural values</del> <u>The protection of conservation values, or the enabling of public access, or the enabling of public recreational use that is compatible with conservation values, or reduction of natural hazard risk</u> warrant a wider or narrower esplanade strip or esplanade reserve; or</li> <li>b. Topography, <u>site location</u>, or the siting of any building or other feature, renders the 20-metre width inadequate or excessive; or</li> <li>c. <del>The protection of Sites and Areas of Significance to Māori or other taonga requires an esplanade reserve or esplanade strip of greater or lesser width than 20 metres; or</del></li> <li>d. <del>The protection or enhancement of biodiversity values or water quality requires an esplanade reserve or esplanade strip of greater or lesser than 20 metres</del></li> </ul> <p><u>and there is an unconditional sale and purchase agreement with the subdividing landowner for the land where a greater than 20-metre width of esplanade reserve is required; or</u></p>
----------	--	--	--

			The land is within a natural hazard area of where there is an identified risk from one or more natural hazards (such as coastal erosion).
SUB- R7	Support	Must be consistent with ECO-R4	
SUB-S1	Support in part	Support the minimum lot sizes for rural and rural lifestyle zone Rural Lifestyle Zone 1 hectare; h. General Rural Zone 4 hectares, except that it is 10 hectares in the Highly Productive Land Precinct; The minimum lot for subdivision for SIB in SUB-R7 should also be listed	Amend SUB-S1 h): Or 4000m <sup>2</sup> in the GRUZ where contains area of significant indigenous biodiversity.
<b>General District-Wide Matters - Ngā Kaupapa ā-Rohe Whānu</b>			
<b>Coastal Environment - Te Taiao o te Takutai</b>			
CE-O1-O3	Support	These objectives appear to be consistent with the NZCPS	Retain as notified.
CE-P1	Support	This overlay must be identified and mapped	This overlay must be identified and mapped
CE-P4	Support	This policy recognises and provides for existing primary production activities. However, the term primary production is not defined in the Plan, although the National Planning Standards definition would apply.	Retain as notified and include the definition for primary production activities from the National Planning Standards.
CE-R1	Support	This recognises lawfully established structures within the Coastal Environment and when they require maintenance/repair.	Retain as notified.
CE-R4		Building height needs to allow for hay sheds and farm structures that are tall to allow for farm equipment and storage.	Increase the building height to 10m, and 500m <sup>2</sup>
CE-R7	Support	Support the provision for farm tracks and fences within High Coastal Natural Character Overlay	Retain as notified.
<b>Earthworks - Te Huke Whenua</b>			
EW-O1	Support	Captures intention for earthworks with avoiding/mitigating adverse effects	Retain as notified
EW-P1-P4	Support	These provide for the practical requirements of earthworks while also recognising the need to minimise any adverse effects	Retain as notified
EW-P4	Support in part	An objective to 'protect' critical infrastructure would be better focused on ensuring that critical infrastructure is not compromised from the adverse effects of earthworks.	Amend EW-P4 Ensure that critical infrastructure and natural hazard defences are not compromised by the adverse effects of earthworks.
EW-R1	Support	The earthwork general standards are supported, in particular reference to NZECP34:2001	Retain as notified



EW-R3	Support		Agricultural activities are permitted in the GRUZ so earthworks ancillary to agricultural activities are provided for as a permitted activity as long as standards in EW-R1 are met. This approach is supported.	Retain as notified.
<b>Light - Ngā Rama</b>				
LIGHT-O1	Support in part		Recognition of the need for artificial lighting for rural productive activities is supported. Adequate lighting is essential for health and safety purposes. A definition is sought for rural production activities so the term in the objective should be consistent.	Amend LIGHT-O1 as follows: Change 'rural productive activities' to 'rural production activities' Night-time work, rural <del>production</del> <u>productive</u> activities, recreation activities, sport, entertainment activities, transportation and public health and safety <u>are enabled through artificial outdoor lighting</u>
LIGHT – P1, P2	Support in part		Primary sector activities require the use of artificial light for day-to-day operations. For instance, night light is required for dairy sheds where lights will likely be on before 7am, security (particularly around fuel storage), shearing sheds (when sheep are stored in sheds lights are left on overnight in wintering barns), and harvest and spraying (where machinery may be operating at any hour). Seasonal farming operations are not included in the definition of 'temporary activity' (enabled under LIGHT – P2), therefore enablement of agricultural operations is required under P1.	Amend LIGHT-P1: Provide for the use of artificial outdoor lighting that: <u>f. Enables rural production activities.</u>
LIGHT - P2 (b)	Support in part		The reference in LIGHT-P2 to 'artificial outdoor lighting' requires a corresponding definition.	Include a definition for 'artificial outdoor lighting' as: <u>Any electrically-powered exterior lighting that emits directly into the outdoor environment'</u>
LIGHT-R4	Oppose		LIGHT-R4 sets a lux level for the rural zones of 10 lux 7am – 10pm and 2 lux 10pm – 7am as a permitted activity. This level is not practical from a farming perspective – a much higher lux level; is required for health and safety purposes, to waken the cows and security for farm workers. There is no analysis or explanation in the s32 Report to justify why these levels have been chosen. The standard is to be measured at the boundary of any adjoining site or the window closest to the light source. Where rural residential development has been allowed in the rural area this could preclude legally established rural production activities. Further, this does not achieve the outcome of proposed LIGHT – O1 which identifies that rural production activity is enabled through artificial lighting.	Amend LIGHT-R4 to exclude the RURZ
<b>Noise - Ngā Oro</b>				

NOISE-O2	Support in part	<p>Recognising existing noise generating activities, including reverse sensitivity effects is important. However, the objective should refer to 'lawfully established activities' which is defined in the Plan.</p> <p>Noise sensitive activities are not defined in the Plan. It should be clear the type of activity that is considered to be noise sensitive.</p>	<p>Amend NOISE-O2</p> <p>The function and operation of lawfully established activities that generate noise and community infrastructure are not compromised by adverse effects, including reverse sensitivity effects, from noise sensitive activities.</p> <p>Include a definition for noise sensitive activities: Means activities that may be affected by noise including residential activities, education facilities, visitor accommodation, health facilities.</p>
NOISE-P2	Support in part	<p>The rural area is not listed as being a higher noise environment, yet many rural dwellers complain about noise experienced in a rural location. Rural production activities are noise generating activities and the Rural zones should be recognised as areas where noise levels may be higher than anticipated by people who think it is a 'quiet' environment.</p>	<p>Amend NOISE-P2 to include GRUZ as a higher noise environment.</p>
NOISE-P4	Support in part	<p>NOISE-P4 seeks to 'protect' the health and wellbeing of people and communities but if people are inappropriately located in a higher noise environment such level of protection may not be possible.</p>	<p>Amend NOISE-P4 to:</p> <p>Ensure noise effects generated by an activity are of a type, scale and level that are appropriate for the predominant role, function and character of the receiving environment and <u>provide for protect</u> the health and wellbeing of people and communities having regard to: ....</p>
NOISE – R2	Support in Part	<p>NOISE-R2 11) provides an exemption for rural production activities undertaken for a limited duration. This is supported.</p> <p>NOISE-R2-12 provides an exemption of aircraft for rural production purposes. This is supported.</p> <p>The reference in NOISE-R2 16) to 'audible bird scaring device' requires a corresponding definition.</p>	<p>Amend NOISE-R2 11) by replacing 'agricultural, horticulture and pastoral farming activities' with 'rural production activities'.</p> <p>Retain NOISE-R2 12)</p> <p>Include a definition for 'audible bird scaring device' as: '<u>Gas guns and avian distress alarms used for the purposes of disturbing or scaring birds</u>'.</p>
NOISE-R6	Oppose in part	<p>NOISE-R6 sets noise limits for the rural zones and amends the time over weekends and public holidays. Rural production activities are 24/7 activities and do not make a differentiation based on the day of the week. Such an approach is not appropriate in the GRUZ.</p>	<p>Amend NOISE-R6 1) a ) and b) by deleting specified days of the week</p> <ul style="list-style-type: none"> <li>a) 7.00am to 10.00pm: 55dB LAeq(15 mins)</li> <li>b) 10.00pm to 7.00am: 45dB LAeq(15 mins)</li> <li>c) 10.00pm to 7.00am all days: 75 dB LAFmax</li> </ul>

### 2.3 Part 3 – Area-Specific Matters - Te Wāhanga 3 - Ngā Take a Ia Rohe

Provision	Position	Reason	Relief sought
<b>Zones - Ngā Takiwā</b>			
Rural Zones - Objectives and Policies - Ngā Whāinga me ngā Kaupapa Here			
Rural Zones - Objectives and Policies  Overview	Support in part	Typo of 'levels' must be amended. On farm accommodation for workers is often provided in close proximity to other dwellings therefore separation distance from neighbours is not guaranteed, as implied by current wording.	Amend statement:  Rural areas are also residential environments – characterised by a lower levels of built development. <del>and greater separation distance from neighbours.</del>
RURZ- New objective		There is no objective that enables rural production activities in the rural zones. This may be because the structure of the objectives and policies applies generically across all rural zones and not specific to the General Rural Zone. However, to be consistent with the Zone Framework Standard in the National Planning Standards there needs to be objective which clearly set out the expectations for each respective zone.	Amend RURZ-O1 or include as GRUZ-O1: The General Rural Zone provides for primary production activities and a range of activities that support primary production activities and other activities that require a rural location.
RURZ-O1	Oppose in part	As drafted this objective focuses more on the amenity and character of the zone than the activities that occur and contribute to those attributes. It also provides for 'a range of activities' whereas the National Planning Standards are quite specific about the type of activities that are appropriate in the rural zones.	Reword: The function, amenity and character values of the rural environment are maintained through providing for primary production activities and activities which support primary production or which require to be located in a rural environment and which are appropriately located in a rural zone.
RURZ-O2	Support in part	RURZ-O2 is related to the Rural Lifestyle zone and should reflect the expectation of that zone.	Amend RURZ-O2 or include as RLZ-O1: The Rural Lifestyle zone provides for low density rural lifestyle living while still enabling primary production to occur, while avoiding conflicts and reverse sensitivity effects with rural production activities

RURZ-O3 and O4	Support in part	Both RURZ-O3 and RURZ-O4 relate to the settlement zones. It would be more appropriate that these were included in the SETZ provisions.	Move RURZ-O3 and RURZ-O4 to SETZ-O1 and O2.
RURZ-P1	Oppose in part	The policy seeks to provide for a 'variety of activities' to occur within the RURZ. The National Planning Standards are quite specific about the type of activities that are appropriate in the rural zones and using broad open-ended terminology does not provide direction.	Amend RURZ-P1: Rural character will be maintained in the GRUZ and RLZ by: <ul style="list-style-type: none"> <li>a. Buildings and structures having a bulk and location characteristic of rural environments and primary production activities</li> <li>b. Maintaining privacy and rural outlook for residential buildings</li> <li>c. Ensuring activities are compatible with the existing development and surrounding area while recognising that primary production activities can generate noise, odour and dust</li> <li>d. Having appropriate setbacks from roads and adjacent primary production activities</li> <li>e. Locating activities sensitively in the environment to minimise adverse visual and cultural effects if sited on ridge lines or ancestral mountains.</li> </ul>
RURZ-P2 and P3	Support in part	Both RURZ-P2 and P3 relate to settlements and would be more appropriately located in the SETZ zone.	Move RURZ-P2 and P3 to SETZ-P1 and P2.
RURZ-P5	Support in part	Recognition of highly productive land is supported. However this policy applies specifically to the GRUZ.	Move RURZ-P5 to GRUZ-P1
RURZ-PX	New policy	There is no policy providing for rural industry which has a functional need to locate in the Rural zones. There is a rule for rural industry and there should be a policy that provides direction for the activity. Rural industry would include rural contractor depots, rural trucking depots, research centres, and rural supplies stores.	Include a policy for rural industry RURZ-PX Rural industry Recognise and provide for rural industry which support primary production and are an essential component of rural production on the West Coast.

		Rural industry is distinct from non-rural activities so RURZ-P6 is not appropriate for rural industry.	
RURZ-P6	Support	Appreciate that where an activity has a functional relationship with rural areas then it may be appropriate to locate that activity in a rural zone, provided any adverse effects are managed and a new policy is introduced as above where an activity supports primary production.	Retain as notified in addition to new policy RURZ-PX above.
RURZ-P9 and P10	Support in part	Recognition of the visitor economy is needed but the location of tourism in the RURZ should not adversely affect rural production	Amend RURZ-P10 by adding and which do not adversely effect rural production activities
RURZ-P15	Support in part	The policy for reverse sensitivity is supported but 'existing rural uses and consented activities' would be better to refer to 'lawfully established activities' which is a defined term in the plan.	Amend RURZ-P15 by replacing 'existing rural uses and consented activities' with 'lawfully established activities'.
RURZ-P27	Support in part	It should be clear that Policy 26 applies to rural production uses while Policy 27 applies to non-rural production uses.	Amend RURZ-P27 Manage the location and operation of airfield and helicopter landing areas within the rural area for activities other than for primary production to provide for the amenity values of the surrounding rural area.
RURZ-P28	Support	Policy 28 provides for the use of aircraft for rural production. This is supported.	Retain RURZ-P28
<b>General Rural Zone -</b>			
GRUZ-R1	Oppose	GRUZ-R1 combines rural production activities with building activities in the one rule. Other rules refer to the requirements of R1 as they relate to buildings. It would be better to have a specific rule for buildings and a specific rule providing for rural production activities.	Amend GRUZ-R1: Rural production activities Permitted Where: 1. Woodlots are not established within 10m of the boundary of an adjoining property unless that property is within plantation forestry and 40m from a residential activity. 2. Performance standards for beekeeping in the Westland District apply as follows: i) No bees may be kept on a property less that 600m2 net site area ii) Beehives must be placed with and obstruction in front of them or be elevated to enable bees to be 2.5m



			<p>above ground level prior to crossing the site boundary.</p> <p>Insert new GRUZ rule:</p> <p>Buildings</p> <p>Permitted activity</p> <p>Where:</p> <p>Include Clauses 1,2,3 and 5 from Notified GRUZ-R1</p> <p>And</p> <p>Amend references to Rule GRUZ-R1 in other rules to ensure correct reference to new numbering.</p>
GRUZ - R3 (4)	Support in part	<p>Primary production farms require multiple dwellings for staff accommodation often in close proximity to each other.</p> <p>Larger farms may have several individual minor residential units within close proximity.</p>	<p>Amend statement:</p> <p>There is no more than <del>3</del> <u>5</u> minor residential units per 10ha net site area that:</p> <p>i. Are located within 20 metres of and share the driveway with either the principal dwelling; or</p> <p>ii. Are worker accommodation associated with primary production buildings;</p>
GRUZ-R21	Oppose in part	<p>There should be provision for small scale rural industry in the General Rural Zone as a permitted activity. Such facilities have a functional need to locate in the rural zone.</p>	<p>Include a permitted activity rule for Rural industry:</p> <p>Activity Status Permitted</p> <p>Where:</p> <p>All performance standards for Rule GRUZ-R1X are complied with</p> <p>The maximum floor and yard area shall be 250m<sup>2</sup></p>
GRUZ-R24	Oppose	<p>GRUZ-R24 provides for non-rural activities as a Restricted Discretionary Activity up to 250m<sup>2</sup>.</p> <p>This is a more generous provision than for rural industry which has a functional need to locate in the GRUZ.</p> <p>A matter of discretion should be the functional need to locate in the GRUZ.</p>	<p>Amend GRUZ-R24 to Discretionary.</p> <p>Add an additional matter:</p> <p>The functional need to locate in the GRUZ.</p>
<b>Rural Lifestyle Zone- Te Takiwā Kāinga Tuawhenua</b>			
RLZ-R1	Support in part	<p>Support the excluded activity – however question the exclusion of stock yards and farm quarries?</p> <p>Clarity is needed as to why stock yards are excluded from the permitted activity criteria.</p>	<p>Clarity is needed as to why stock yards and farm quarries are excluded from the permitted activity criteria</p>

RLZ - R3	Support in Part	Minor residential units may be used to house staff in the rural lifestyle zone, where rural activities occur. The maximum gross floor area of 65m <sup>2</sup> limits the type of unit and 80m <sup>2</sup> is more appropriate.	Amend clause 3:  There is no more than 1 minor residential unit with a maximum gross floor area of 6580m <sup>2</sup> where this is located within 20 metres of and shares the driveway with the principal dwelling.
----------	-----------------	--	--

West Coast Federated Farmers thanks the Councils for the opportunity to submit on the proposed Plan.

Bede O'Connor  
 President  
 West Coast Federated Farmers