

FURTHER SUBMISSION

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To: Central Hawkes Bay District Council

Further Submission on: Proposed Central Hawkes Bay District Plan.

Date: 9 November 2021

Submission by: **FEDERATED FARMERS OF NEW ZEALAND**

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Federated Farmers confirms it is eligible to make a further submission under RMA Schedule 1, clause 8, because we are a submitter on the proposed District Plan, and we are a membership and advocacy organisation that represents farmers in the Central Hawkes Bay District.

FFNZ wish to be heard in support of our submission.

FURTHER SUBMISSION TO PROPOSED CENTRAL HAWKES BAY DISTRICT PLAN – FEDERATED FARMERS OF NEW ZEALAND (FFNZ)

DEFINITIONS					
Plan Provision	Submission Point	Submitter	Support/ Oppose	Reasons for Further Submission	Decision Sought
Definitions	S56.002	Powerco Limited	Oppose	Oppose the submitter seeking a new definition for gas distribution network, because it is a subject that does not need RMA regulation – easement agreements are an appropriate mechanism.	That the submission be rejected.
Definitions	S79.006	Transpower New Zealand Ltd	Oppose	Oppose the separate definition and status for minor upgrade, any upgrade, minor or not, has obligations under the Public Works Act to address injurious affection, and the District Plan must not prejudice this process.	That the submission be rejected.
Definitions	S117.022 S118.022 S119.022	Chorus New Zealand Ltd Spark New Zealand Ltd Vodafone New Zealand Ltd	Oppose	Oppose the separate definition and status for minor upgrade, any upgrade, minor or not, has obligations under the Public Works Act to address injurious affection, and the District Plan must not prejudice this process.	That the submission be rejected.
NETWORK UTILITIES					
Plan Provision	Submission Point	Submitter	Support/ Oppose	Reasons for Further Submission	Decision Sought
NU - Introduction	S79.018	Transpower New Zealand Ltd	Oppose in part	The submitter seeks a standalone set of provisions within the Network Utilities Chapter as it avoids duplication in the zones chapters. Federated Farmers sees some merit having the National Grid Yard rules in the zone chapters as it is easy for a farmer to see all provisions in one chapter. However on the other hand the reader already has to turn to other chapters such as HH, SASM or ECO to find specific provisions, so the submitter’s relief for stand alone provisions is not unusual. Oppose the submitter	That the submission be rejected in part.

				seeking any regulations that exceed the requirements of NPS-ET (specifically policies 10 and 11) and NZECP34 (specifically Sections 2.3 and 2.4) and not undermine landowners' rights awarded by their legal easement agreements and other legislation.	
NU-I1	S56.006	Powerco Limited	Oppose	Oppose the submitter seeking to delete reference to adverse effects arising from network utilities. Adverse effects on the environment as well as on landowner activities can and do occur, and need to be managed. Network utilities do not have an RMA status above any other activity, all have an obligation to manage adverse effects.	That the submission be rejected.
NU-O1	S79.022	Transpower New Zealand Ltd	Support in part	Agree with the submitter that the National Grid is distinct from other network utilities due to the NPS-ET. Federated Farmers do not want other network utilities such as local electricity distribution to be included in any provisions that are intended to meet the requirements of the NPS-ET, so a separate objective is a good idea. However we oppose any regulations that exceed the requirements of NPS-ET (specifically policies 10 and 11) and NZECP34 (specifically Sections 2.3 and 2.4)	That the submission be accepted in part.
NU-O1	S117.031 S118.031 S119.031	Chorus New Zealand Ltd Spark New Zealand Ltd Vodafone New Zealand Ltd	Oppose	Oppose the submitter seeking a re-write of the objective. The proposed objective is sufficient to meet the submitter's concerns.	That the submission be rejected.
NU - 03	S79.023	Transpower New Zealand Ltd	Oppose in part	Agree with the submitter that the National Grid is distinct from other network utilities due to the NPS-ET. Federated Farmers do not want other network utilities such as local electricity distribution to be included in any provisions that are intended to meet the requirements of the NPS-ET, so a separate objective may be necessary. However we oppose any regulations that exceed the requirements of NPS-ET (specifically policies 10 and 11) and NZECP34 (specifically Sections 2.3 and 2.4)	That the submission be rejected in part.

NU-O3	S117.033 S118.033 S119.033	Chorus New Zealand Ltd Spark New Zealand Ltd Vodafone New Zealand Ltd	Oppose	Oppose the submitter seeking to protect network utilities. Network utilities are not an RMA s6 matter, nor do they have a special status above other activities, instead they must co-exist with other activities such as farming. Only the National Grid has buffer corridors/yards to meet NPS-ET policies 10 and 11, other network utilities are not included in this NPS. Easement agreements are the instrument that should be used by network utilities to manage their assets that are located on private land.	That the submission be rejected.
NU-PXX (new policy)	S79.026	Transpower New Zealand Ltd	Oppose in part	Agree with the submitter that the National Grid is distinct from other network utilities due to the NPS-ET, so a separate objective may be necessary. However we oppose any regulations that exceed the requirements of NPS-ET (specifically policies 10 and 11) and NZECP34 (specifically Sections 2.3 and 2.4) The adverse effects of the National Grid on farming needs to be acknowledged where it traverses private property, and easement agreements as an alternative and preferred method for new or upgraded National Grid infrastructure (as per the Public Works Act) needs to be included in any policy.	That the submission be rejected in part.
NU-PXX (new policy)	S117.040 S118.040 S119.040	Chorus New Zealand Ltd Spark New Zealand Ltd Vodafone New Zealand Ltd	Oppose	Oppose the submitter seeking to provide flexibility to network utility providers. Access over private land to utilities is a matter for the landowner and must not be compelled by the District Plan, reuse or re-purposing of redundant utilities is for the Public Works Act.	That the submission be rejected.
NU-P1	S117.034 S118.034 S119.034	Chorus New Zealand Ltd Spark New Zealand Ltd Vodafone New Zealand Ltd	Oppose	Oppose the submitter seeking a re-write of NU-P1 because the concerns are already addressed by the proposed provisions and other legislation such as the Public Works Act: significant upgrades would be subject to the Public Works Act and injurious affection would occur if the works are on private land; access for maintenance is a matter for the utility provider to negotiate with the landowner; easement agreements are an appropriate mechanism to address network utilities occurring on private land.	That the submission be rejected.

NU-P5	S79.030	Transpower New Zealand Ltd	Oppose	Oppose the submitter seeking to avoid reverse sensitivity because this is inconsistent with the NPS-ET Policy 10 which only requires avoidance <i>to the extent reasonably possible</i> . We oppose any provisions that exceed the requirements of NPS-ET (specifically policies 10 and 11) and NZECP34 (specifically Sections 2.3 and 2.4) Agree with the submitter that the reference near the National Grid is unsatisfactory, because only activities <i>inside</i> the National Grid Yard or Subdivision Corridor are to be managed.	That the submission be rejected.
NU-P5	S81.053	Horticulture New Zealand	Support	Support the submitter seeking to recognise and provide for network utilities, rather than protecting them. Network utilities do not have an RMA status above any other activities.	That the submission be accepted.
NU-P5 (5)	S81.054	Horticulture New Zealand	Support	Agree with the submitter that easement agreements already manage any issues around gas pipelines, and district plan regulation is unnecessary. There is 100% easement coverage where-ever gas pipelines cross private land, which require setbacks for activities and earthworks. An easement agreement on a Certificate of Title is much more informative and specific to the landowner than district plan provisions.	That the submission be accepted.
NU-P5 (6)	S81.055	Horticulture New Zealand	Support	Agree with the submitter that the reference near the National Grid is unsatisfactory, because only activities <i>within</i> the National Grid Yard or Subdivision Corridor are to be managed.	That the submission be accepted.
NU-P5	S117.038 S118.038 S.119.038	Chorus New Zealand Ltd Spark New Zealand Ltd Vodafone New Zealand Ltd	Oppose	Oppose the submitter seeking to protect network utilities. Network utilities are not an RMA s6 matter, nor do they have a special status above other activities, instead they must co-exist with other activities such as farming.	That the submission be rejected.
NU - Rules	S79.031	Transpower New Zealand Ltd	Oppose in part	Agree with the submitter that the National Grid is distinct from other network utilities due to the NPS-ET, so a separate objective may be necessary. However we oppose any regulations that exceed the requirements	That the submission be rejected in part.

				of NPS-ET (specifically policies 10 and 11) and NZECP34 (specifically Sections 2.3 and 2.4)	
NU-R2	S81.056	Horticulture New Zealand	Support	Agree with the submitter seeking increase in electricity voltage is included as minor upgrading, because it is over and above maintenance or operation.	That the submission be accepted.
SITES OF SIGNIFICANCE TO MAORI					
Plan Provision	Submission Point	Submitter	Support/ Oppose	Reasons for Further Submission	Decision Sought
SASM-P4	S125.046	Ngā hapū me ngā marae o Tamatea	Oppose	Oppose the submitter seeking the provision is not limited to scheduled sites. The provision must be limited to scheduled sites so land owners know where sites are located and they can either choose another location or know when rules will apply. Other protocol will be relevant when an unrecorded archaeological site is discovered.	That the submission be rejected.
SUBDIVISION					
Plan Provision	Submission Point	Submitter	Support/ Oppose	Reasons for Further Submission	Decision Sought
SUB-O4	S81.079	Horticulture New Zealand	Support	Agree with the submitter that existing and established primary production can also be a victim to reverse sensitivity when subdivision occurs.	That the submission be accepted.
SUB-P6	S117.061 S118.061 S.119.061	Chorus New Zealand Ltd Spark New Zealand Ltd Vodafone New Zealand Ltd	Oppose	Oppose the submitter seeking that all new lots are connected to telecoms networks. In rural areas where infrastructure is scarce this will be difficult for the landowner/subdivider to achieve, and could prevent farm subdivision. It is up to the telecoms providers to construct towers or aerials for better rural coverage, not for the landowner/subdivider.	That the submission be rejected.
SUB-P18	S79.075	Transpower New Zealand Ltd	Oppose	Oppose the submitter seeking deletion of <i>to the extent practicable</i> , the policy is sufficient as proposed.	That the submission be rejected.
SUB - Rules	S79.077	Transpower New Zealand Ltd	Oppose	Oppose the submitter seeking a stand-alone rule with RD status for all subdivision within the National Grid Subdivision Corridor. A subdivision that demonstrates	That the submission be rejected.

				standards within the National Grid Yard and Subdivision Corridor are complied with, should have the same activity status as a normal subdivision. A subdivision such as a large lot farm subdivision will readily have a building platform outside the NatGrid Yard, plenty of access over the site that will not box in the transmission lines, and little likelihood of introducing a new sensitive activity, and should be able to proceed under normal rural subdivision rules without needing an extra resource consent. Access (routes, what vehicles, where to, and when) by National Grid work crews is a matter to be negotiated with the landowner and cannot be compelled by the District Plan.	
SUB-R1 SUB-R3 SUB-R4 SUB-R5 SUB-R6 SUB-R7	S79.078 S79.079 S79.080 S79.081 S79.082 S79.083	Transpower New Zealand Ltd	Oppose	Oppose the submitter seeking a stand-alone rule for subdivision within the National Grid Subdivision Corridor. A subdivision that demonstrates standards within the National Grid Yard and Subdivision Corridor are complied with, should have the same activity status as a normal subdivision.	That the submission be rejected.
SUB-SXX (new standard)	S117.064 S118.064 S.119.064	Chorus New Zealand Ltd Spark New Zealand Ltd Vodafone New Zealand Ltd	Oppose	Oppose the submitter seeking a new standard that all new lots are connected to telecoms networks. In rural areas where infrastructure is scarce this will be difficult for the landowner/subdivider to achieve, and could prevent farm subdivision. It is up to the telecoms providers to construct towers or aerials for better rural coverage, not for the landowner/subdivider.	That the submission be rejected.
ECOSYSTEMS AND BIODIVERSITY					
Plan Provision	Submission Point	Submitter	Support/ Oppose	Reasons for Further Submission	Decision Sought
ECO	S126.003	Hawke's Bay District Health Board	Oppose	Oppose the submitter blaming agriculture takes for death of kahikatea without evidence. The rules the submitter seeks for water takes are outside the functions of a district plan. The submitter should be	That the submission be rejected.

				concerned with human health and does not have a mandate to advocate for indigenous vegetation.	
ECO	S132.005	Ernslaw One	Oppose	Oppose the submitter seeking to exclude livestock from SNAs. Farmers with large SNAs in hill country or along DoC estate that are unfenced will struggle to keep all their extensively farmed sheep and cattle out of the SNA, which can provide shelter and shade as an animal welfare benefit.	That the submission be rejected
ECO - new objective	S120.020	Heretaunga Tamatea Settlement Trust	Oppose	The submitter's concerns about relationship of tangata whenua to waterbodies is better addressed elsewhere, possibly the regional plan.	That the submission be rejected.
ECO – new policy	S120.021	Heretaunga Tamatea Settlement Trust	Oppose	The submitter's concerns about relationship of tangata whenua to waterbodies is better addressed elsewhere, possibly the regional plan.	That the submission be rejected.
ECO-P4	S75.034	Royal Forest and Bird Protection Society NZ	Oppose	Oppose the submitter because some loss of biodiversity values is allowed by the district plan, by having permitted activities. The policy is not clear whether it applies to only SNAs, or to vegetation and habitats outside SNAs.	That the submission be rejected.
ECO – new rule	S81.073	Horticulture New Zealand	Support	Agree with the submitter that a rule enabling biosecurity response is needed. Biosecurity incursions within indigenous vegetation are becoming worryingly likely. If an incursion of a weed on the Regional Pest Management Strategy “eradication” list, or a disease like Myrtle Rust occurs within native vegetation then a district plan rule means the necessary work can be undertaken rapidly.	That the submission be accepted.
ECO-R1	S75.038	Royal Forest and Bird Protection Society NZ	Oppose	Oppose the submitter seeking resource consent for plantation forestry understory, because this would prevent and discourage farmers from having farm forestry to meet water quality or climate change ambitions. Especially when these same farmers are likely to have an SNA on their property, which provides positive biodiversity values to offset any understory clearance.	That the submission be rejected.
ECO-R2	S39.003	Kathryn Bayliss	Oppose	Oppose the submitter seeking to prohibit clearance and trimming to be discretionary, because there are	That the submission be rejected.

				many situations where clearance and trimming is necessary for social, economic and cultural wellbeing, and health and safety. The district plan would not otherwise meet RMA s.5 purpose.	
ECO-R2	S75.039	Royal Forest and Bird Protection Society NZ	Oppose	Oppose the submitter seeking stronger permitted conditions, because there are many situations where clearance and trimming is necessary for social, economic and cultural wellbeing, and health and safety. The district plan would not otherwise meet RMA s.5 purpose.	That the submission be rejected.
ECO-R3	S39.004	Kathryn Bayliss	Oppose	Oppose the submitter seeking to prohibit clearance and trimming to be discretionary, because there are many situations where clearance and trimming is necessary for social, economic and cultural wellbeing, and health and safety. The district plan would not otherwise meet RMA s.5 purpose.	That the submission be rejected.
ECO-R4	S39.005	Kathryn Bayliss	Oppose	Oppose the submitter seeking to prohibit clearance and trimming to be discretionary, because there are many situations where clearance and trimming is necessary for social, economic and cultural wellbeing, and health and safety. The district plan would not otherwise meet RMA s.5 purpose.	That the submission be rejected.
ECO-R4	S64.065	Department of Conservation	Oppose	Oppose the submitter seeking to reduce the allowed clearance limit. The rule applies only to vegetation that is <i>not</i> significant, so clearance should be unlimited. Vegetation within SNAs will be protected and unaffected by this rule.	That the submission be rejected.
ECO-R4	S75.041	Forest & Bird	Oppose	Oppose the submitter seeking further checks the area is not 'significant.' The Council has undertaken an thorough and comprehensive SNA identification process, so there will be no other sites out there.	That the submission be rejected.
ECO-R5	S39.006	Kathryn Bayliss	Oppose	Oppose the submitter seeking to prohibit clearance and trimming to be discretionary, because there are many situations where clearance and trimming is necessary for social, economic and cultural wellbeing, and health and safety. The district plan would not otherwise meet RMA s.5 purpose.	That the submission be rejected.

ECO-R6	S11.019	Hawke's Bay Regional Council	Support in part.	The submitter demonstrates why an onerous non-complying rule for any trimming or removal of wetland indigenous vegetation is impractical and can be a barrier to activities with a positive environmental outcome. However the submitter's proposed rule should not be limited to only named organisations carrying out the activity because this is not effects based. If clearance during restoration works is good for HBRC, CHB and DoC, then it's good enough for farmers and landowners.	That the submission be accepted, but the rule applies to all people and not just the three named organisations.
ECO-R6	S39.007	Kathryn Bayliss	Oppose	Oppose the submitter seeking to prohibit clearance and trimming to be discretionary, because there are many situations where clearance and trimming is necessary for social, economic and cultural wellbeing, and health and safety. The district plan would not otherwise meet RMA s.5 purpose.	That the submission be rejected.
ECO-AM1	S11.038	Hawke's Bay Regional Council	Oppose	Oppose the submitter seeking a matter to assess effects of activities on nearby SNAs. If it is not an SNA then it shouldn't be assessed as if it was.	That the submission be rejected.
ECO-AM1	S57.064	Fire and Emergency New Zealand	Support	Agree with the submitter that health and safety (such as fire risk) should be included as a matter of assessment.	That the submission be accepted.
ECO-APP1	S64.067	Department of Conservation	Oppose	We are unsure how the submitter's proposed criterion for an ecosystem that has no vegetation or habitat would work, as it sounds like it is not an ecosystem?	That the submission be rejected.
NATURAL FEATURES AND LANDSCAPES					
Plan Provision	Submission Point	Submitter	Support/ Oppose	Reasons for Further Submission	Decision Sought
NFL-P4	S75.063	Royal Forest and Bird Protection Society NZ	Oppose	Oppose the submitter seeking to prevent the construction of a building in the Coastal Environment, because there will be buildings that are consistent with the scheduled landscape and do not adversely affect identified values, such as farm buildings on primary production land.	That the submission be rejected.

NFL-P5	S39.001	Kathryn Bayliss	Oppose	Oppose the submitter seeking to delete the policy for water storage, because water security is becoming ever more important to adapt to climate change and increased droughts, such as the devastating drought of 2020.	That the submission be rejected.
NFL-P5	S75.064	Royal Forest and Bird Protection Society NZ	Oppose	Oppose the submitter seeking to delete the policy for water storage, because water security is becoming ever more important to adapt to climate change and increased droughts, such as the devastating drought of 2020.	That the submission be rejected.
NFL-P5	S112.001	Trevor Le Lievre	Oppose	Oppose the submitter seeking to delete the policy for water storage, because water security is becoming ever more important to adapt to climate change and increased droughts, such as the devastating drought of 2020.	That the submission be rejected.
NFL-R1	S64.078	Department of Conservation	Oppose	Oppose the submitter seeking restricted discretionary status for buildings on ONFLs, because permitted status is appropriate. There will be buildings that are consistent with the scheduled landscape and do not adversely affect identified values, such as farm buildings on primary production land. It is overly onerous to require farmers to obtain RD consent for a farm building on land that is actively used for farming.	That the submission be rejected.
NFL-R1	S75.066	Royal Forest and Bird Protection Society NZ	Oppose	Oppose the submitter seeking the rule applies only to alterations and additions to existing buildings. There will be new buildings where permitted status is appropriate, where the building is consistent with the scheduled landscape and does not adversely affect identified values, such as farm buildings on primary production land.	That the submission be rejected.
OPEN SPACE AND RECREATION					
Plan Provision	Submission Point	Submitter	Support/ Oppose	Reasons for Further Submission	Decision Sought
PA - Policies	S125.067	Ngā hapū me ngā marae o	Neutral	The submitter's concern about mana whenua access is better addressed in discussion with landowners rather	That the submission be rejected.

		Tamatea		than through the District Plan. Federated Farmers knows of CHB landowners who have a standing access arrangement with mana whenua to visit significant sites, and we are sure this can be repeated elsewhere once the access-seeker becomes known and trusted by the landowner, and routes are agreed. A District Plan cannot compel access over private land.	
COASTAL ENVIRONMENT					
Plan Provision	Submission Point	Submitter	Support/ Oppose	Reasons for Further Submission	Decision Sought
CE-OXX (new objective)	S75.071	Royal Forest and Bird Protection Society NZ	Support	Agree with the submitter that public access in the Coastal Environment needs to be addressed, because it is an area where access is anticipated. Open public access needs to be clearly differentiated from private land where the permission of the landowner is needed. It is our preference that public access is addressed in policy CE-P1 which discusses mapping of the coastal environment.	That the submission be accepted.
CE-P2	S75.073	Royal Forest and Bird Protection Society NZ	Oppose in part.	Agree with the submitter that the policy needs to be consistent with the NES Freshwater in its treatment of wetlands, however there will be situations where some activities in wetlands are appropriate.	That the submission be rejected in part.
CE-P6	S75.075	Royal Forest and Bird Protection Society NZ	Support in part	The submitter seeks that activities must demonstrate a functional need to be located in the Coastal Environment, Federated Farmers deems underlying zoning and existing land use will need to be considered when deciding what a functional need is, such as for farm activities on farm land.	That the submission be accepted in part.
EARTHWORKS					
Plan Provision	Submission Point	Submitter	Support/ Oppose	Reasons for Further Submission	Decision Sought
EW - Earthworks	S79.090	Transpower New Zealand Ltd	Oppose	Oppose the submitter seeking any regulations that exceed the requirements of NPS-ET (specifically	That the submission be rejected.

				policies 10 and 11) and NZECP34 (specifically Sections 2.3 and 2.4) and not undermine landowners' rights awarded by their legal easement agreements and other legislation.	
EW – Earthworks	S84.014	Kairakau Lands Trust	Oppose	Oppose the submitter seeking to include further objectives and policies to ensure cultural sites are protected, because the submitter's concerns are already addressed by the Historic Heritage and Sites and Areas of Significance to Maori chapters.	That the submission be rejected.
EW - Earthworks	S126.004	Hawke's Bay District Health Board	Oppose	Oppose the submitter seeking erosion and sediment control plans for permitted activities, because standards are sufficient to meet the submitter's concerns.	That the submission be rejected.
EW-P7	S55.065	Heritage New Zealand Pouhere Taonga	Oppose	Oppose the submitter seeking an additional policy for heritage and cultural matters, because the submitter's concerns are already addressed by the Historic Heritage and Sites and Areas of Significance to Maori chapters.	That the submission be rejected
EW-P9	S75.088	Royal Forest and Bird Protection Society NZ	Oppose	Federated Farmers considers that support needs to be given to enable farm quarries (see submission S75.088).	That the submission be rejected
EW-R1	S55.067	Heritage New Zealand Pouhere Taonga	Oppose	Oppose the submitter seeking earthworks to not be permitted in historic heritage sites and sites of significance to Maori, because the submitter's concern is already addressed by the Historic Heritage and Sites and Areas of Significance to Maori chapters.	That the submission be rejected
EW-R5	S79.093	Transpower New Zealand Ltd	Oppose	Oppose the submitter seeking National Grid Yard earthworks rules that are that are inconsistent with NZECP34, specifically Section 2.2 of the Code. The National Grid occurs overwhelmingly on private land such as farms, often without easement agreements or compensation, and any district plan regulation must not exceed established standards in NZECP34.	That the submission be rejected.
EW-R7	S90.039	Centralines Ltd	Oppose	Oppose the submitter seeking extra matters of discretion for affects on electricity transmission and distribution. Only the national grid (owned by Transpower) is protected under the NPS-ET, electricity	That the submission be rejected.

				distribution lines owned by Centralines do not enjoy this same national statutory status, so do not need to be afforded the same protection in the District Plan as the national grid. Earthworks near electricity distribution and effects such as structural integrity and personal safety are already well-managed by the NZECP34 and easement agreements. If Centralines has neglected to negotiate easement agreements with landowners or carry out education, these failings are not for the District Plan to remedy with regulation.	
EW-SXX (new standard)	S55.071	Heritage New Zealand Pouhere Taonga	Oppose	Oppose the submitter seeking a new standard for earthworks near historic heritage sites and sites of significance to Maori, because the submitter's concern is already addressed by the Historic Heritage and Sites and Areas of Significance to Maori chapters.	That the submission be rejected.
EW-S6	S79.094	Transpower New Zealand Ltd	Oppose	Oppose the submitter seeking National Grid Yard earthworks rules that are that are inconsistent with NZECP34, specifically Section 2.2 of the Code. The National Grid occurs overwhelmingly on private land such as farms, often without easement agreements or compensation, and any district plan regulation must not exceed established standards in NZECP34.	That the submission be rejected.
GENERAL RURAL ZONE					
Plan Provision	Submission Point	Submitter	Support/ Oppose	Reasons for Further Submission	Decision Sought
GRUZ - General Rural Zone	S79.095	Transpower New Zealand Ltd	Oppose	Oppose the submitter seeking any regulations that exceed the requirements of NPS-ET (specifically policies 10 and 11) and NZECP34 (specifically Sections 2.3 and 2.4) and not undermine landowners' rights awarded by their legal easement agreements and other legislation. The submitter seeks to delete the 8m setback from poles, yet the 110kv FHL-WDV-A and B lines overwhelmingly consist of single circuit poles and the submitter's 12m setback far exceeds the engineering safety distances of the NZECP34.	That the submission be rejected.

GRUZ-PXX (new policy)	S57.139	Fire and Emergency New Zealand	Oppose	Oppose the submitter seeking all land use activities have to be serviced for fire-fighting ability. Federated Farmers expects more rural households to obtain their potable water from rainwater tanks, because sharing a private reticulated water supply is being discouraged as a consequence of the new Water Services Act. We do not want farm houses being discouraged or need resource consent because they will be serviced by a tank that is too small for firefighting.	That the submission be rejected.
GRUZ - Rules	S90.043	Centralines Limited	Oppose	Oppose the submitter seeking extra matters of discretion for affects on electricity transmission and distribution. Only the national grid (owned by Transpower) is protected under the NPS-ET, electricity distribution lines owned by Centralines do not enjoy this same national statutory status, so do not need to be afforded the same protection in the District Plan as the national grid. Earthworks near electricity distribution and effects such as structural integrity and personal safety are already well-managed by the NZECP34 and easement agreements. If Centralines has neglected to negotiate easement agreements with landowners or carry out education, these failings are not for the District Plan to remedy with regulation.	That the submission be rejected.
GRUZ-R1 GRUZ-R2 GRUZ-R3 GRUZ-R9	S57.140 S57.141 S57.142 S57.145	Fire and Emergency New Zealand	Oppose	Oppose the submitter seeking a new zone standard requiring provision of firefighting water supply for any development (that is not subdivision.) Regional Council RMA provisions around water takes and storage make it hard enough for farmers to provide enough water simply for their livestock, household and farm needs, let alone for fire fighting. Given this rule is for residential activities, Federated Farmers expects more rural households to obtain their potable water from rainwater tanks, because sharing a private reticulated water supply is being discouraged as a consequence of the new Water Services Act. We do not want farm houses being discouraged or need resource consent because they will be serviced by a tank that is too	That the submission be rejected.

				small for firefighting. To our knowledge, stock water dams and other surface water bodies have been used by fire fighters in rural areas and farmers are happy to enable this.	
GRUZ-R1 GRUZ-R2 GRUZ-R3 GRUZ-R5 GRUZ-R9 GRUZ-S13	S79.098 S79.099 S79.100 S79.101 S79.105 S79.110	Transpower New Zealand Ltd	Oppose	Oppose the submitter seeking any regulations that exceed the requirements of NPS-ET (specifically policies 10 and 11) and NZECP34 (specifically Sections 2.3 and 2.4) and not undermine landowners' rights awarded by their legal easement agreements and other legislation.	That the submission be rejected.
GRUZ-R5	S58.001	Josh and Suzie Calder	Support in part	Agree with the submitter that rural airstrips and helicopter landing areas are important for primary production, however there needs to be a distinction between those on farm used occasionally for fert spreading or spraying, and those that are used daily like a depot.	That the submission be accepted in part.
GRUZ-AMXX (new assessment matter)	S57.156	Fire and Emergency New Zealand	Oppose	Oppose the submitter seeking an additional assessment matter for firefighting water supply. Regional Council RMA provisions around water takes and storage make it hard enough for farmers to provide enough water simply for their livestock, household and farm needs, let alone for fire fighting. To our knowledge, stock water dams and other surface water bodies have been used by fire fighters in rural areas and farmers are happy to enable this.	That the submission be rejected.
RURAL PRODUCTION ZONE					
Plan Provision	Submission Point	Submitter	Support/ Oppose	Reasons for Further Submission	Decision Sought
RPROZ - Rural Production Zone	S79.111	Transpower New Zealand Ltd	Oppose in part	The submitter seeks a standalone set of provisions within the Network Utilities Chapter as it avoids duplication in the zones chapters. Federated Farmers sees some merit having the National Grid Yard rules in the zone chapters as it is easy for a farmer to see all provisions in one chapter. However on the other hand the reader already has to turn to	That the submission be rejected in part.

				other chapters such as HH, SASM or ECO to find specific provisions, so the submitter's relief for stand alone provisions is not unusual. Oppose the submitter seeking any regulations that exceed the requirements of NPS-ET (specifically policies 10 and 11) and NZECP34 (specifically Sections 2.3 and 2.4) and not undermine landowners' rights awarded by their legal easement agreements and other legislation.	
RPROZ-PXX (new policy)	S57.177	Fire and Emergency New Zealand	Oppose	Oppose the submitter seeking an additional policy for firefighting water supply. Regional Council RMA provisions around water takes and storage make it hard enough for farmers to provide enough water simply for their livestock, household and farm needs, let alone for fire fighting. To our knowledge, stock water dams and other surface water bodies have been used by fire fighters in rural areas and farmers are happy to enable this.	That the submission be rejected.
RPROZ - Rules	S79.113	Transpower New Zealand Ltd	Oppose in part	The submitter seeks a standalone set of provisions within the Network Utilities Chapter as it avoids duplication in the zones chapters. Federated Farmers sees some merit having the National Grid Yard rules in the zone chapters as it is easy for a farmer to see all provisions in one chapter. However on the other hand the reader already has to turn to other chapters such as HH, SASM or ECO to find specific provisions, so the submitter's relief for stand alone provisions is not unusual. Oppose the submitter seeking any regulations that exceed the requirements of NPS-ET (specifically policies 10 and 11) and NZECP34 (specifically Sections 2.3 and 2.4) and not undermine landowners' rights awarded by their legal easement agreements and other legislation.	That the submission be rejected in part.
RPROZ - Rules	S90.045	Centralines Limited	Oppose	Oppose the submitter seeking a new matter for discretion. It is unfair to assess an activity against potential future upgrading or development of network utilities, adverse effects assessments need to be limited to the here and now. It is more likely that	That the submission be rejected.

				upgrading and development of network utilities will impact on other, existing activities, such as farming. Electrical safety is already managed by the NZECP34.	
RPROZ-R1 RPROZ-R2 RPROZ-R3 RPROZ-R5 RPROZ-R8 RPROZ-R9 RPROZ-R10 RPROZ – R11 RPROZ – R12 RPROZ – R14	S57.178 S57.179 S57.180 S57.181 S57.182 S57.183 S57.184 S57.185 S57.186 S57.188	Fire and Emergency New Zealand	Oppose	Oppose the submitter seeking an additional standard for firefighting water supply. Regional Council RMA provisions around water takes and storage make it hard enough for farmers to provide enough water simply for their livestock, household and farm needs, let alone for fire fighting. To our knowledge, stock water dams and other surface water bodies have been used by fire fighters in rural areas and farmers are happy to enable this.	That the submission be rejected.
RPROZ – R1 RPROZ – R2 RPROZ – R3 RPROZ – R5 RPROZ – R6 RPROZ – R7 RPROZ – R8 RPROZ – R9 RPROZ – R10 RPROZ – R11 RPROZ – R12	S79.114 S79.115 S79.116 S79.117 S79.118 S79.119 S79.120 S79.121 S79.122 S79.123 S79.124	Transpower New Zealand Ltd	Oppose	Oppose the submitter seeking any regulations that exceed the requirements of NPS-ET (specifically policies 10 and 11) and NZECP34 (specifically Sections 2.3 and 2.4) and not undermine landowners' rights awarded by their legal easement agreements and other legislation.	That the submission be rejected.
RPROZ-R5	S41.002	Jill Fraser	Oppose	Oppose the submitter seeking changes to the permitted standards. Weekly or daily maximum movement limits would be impractical, because primary production air activity will be concentrated over a short period of time for seasonal activities like spraying or fert spreading, and then absent for the rest of the year.	That the submission be rejected.
RPROZ-R5	S41.003	Jill Fraser	Oppose	Oppose the submitter seeking changes to the permitted standards. Hours of operation will be impractical, because seasonal primary production activities like arial spraying or fert spreading will need to occur after normal working hours to take advantage of weather.	That the submission be rejected.

RPROZ-AMXX (new assessment matter)	S57.195	Fire and Emergency New Zealand	Oppose	Oppose the submitter seeking an additional assessment matter for firefighting water supply. Regional Council RMA provisions around water takes and storage make it hard enough for farmers to provide enough water simply for their livestock, household and farm needs, let alone for fire fighting. To our knowledge, stock water dams and other surface water bodies have been used by fire fighters in rural areas and farmers are happy to enable this.	That the submission be rejected.
Plan Provision	Plan Provision	Plan Provision	Plan Provision	Plan Provision	Plan Provision

Federated Farmers is a not-for-profit primary sector policy and advocacy organisation that represents the majority of farming businesses in New Zealand. Federated Farmers has a long and proud history of representing the interests of New Zealand's farmers.

The Federation aims to add value to its members' farming businesses. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:

- Our members may operate their business in a fair and flexible commercial environment;
- Our members' families and their staff have access to services essential to the needs of the rural community; and
- Our members adopt responsible management and environmental practices.

This submission is representative of member views and reflect the fact that resource management and government decisions impact on our member's daily lives as farmers and members of local communities.

Federated Farmers thanks the Central Hawkes Bay District Council for considering our further submission to the proposed District Plan.

