



Timaru District Council  
2 King George Place  
Timaru 7910  
Phone: 03 687 7200

## Further Submission in Support of, or in Opposition to the Proposed Timaru District Plan

Clause 8 of Schedule 1, Resource Management Act 1991

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**Further submissions close on Friday 4 August 2023 at 5pm**

**To: Timaru District Council**

This is a further submission in support of, or in opposition to, a submission on the **Proposed Timaru District Plan**.

**Full name of person making further submission:**

Federated Farmers of New Zealand

**Organisation name and contact (if representing a group or organisation):**

**Angela Johnston**  
**Senior Policy Advisor**  
**Federated Farmers of New Zealand**  
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**Dunedin 9058 New Zealand**

**Only certain persons can make a further submission. Please select the option that applies.**

**I am:**

- a person representing a relevant aspect of the public interest;
- a person who has an interest in the proposal that is greater than the interest the general public has;
- the local authority for the relevant area.

Please explain why you come within the category selected above:

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

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

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

*The reasons for our support or opposition are: Variously stated with respect to respective*

*submitters in the table attached to this further submission.*

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

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

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

## Hearing options

I wish to be heard in support of my further submission?  Yes  No

If others make a similar further submission, I will consider presenting a joint case with them at a hearing.

Yes  No

Signature: jsutherland                      Date: 4.08.2023

*(of person making submission or person authorised to make decision on behalf)*

**PLEASE NOTE** - A signature is not required if you submit this form electronically. By entering your name in the box above you are giving your authority for this application to proceed.

**Electronic address for service of person making further submission:** jsutherland@fedfarm.org.nz

**Telephone:** 0273878909

**Postal address (or alternative method of service under section 352 of the Act): Federated Farmers of New Zealand PO Box 5242 Dunedin 9058 New Zealand**

**Contact person:** *[name and designation, if applicable]:* James Sutherland

**You have served a copy of the further submission on the original submitter (this is required under the Resource Management Act 1991 Schedule 1, s8A(2) to be completed within 5 working days after it is served on the Timaru District Council)**

Yes  No

**Further submissions close on Friday 4 August 2023 at 5pm.**

**Name of person making further submission: Federated Farmers of New Zealand**

This further submission is in relation to the original submission of:	This further submission is in relation to the original submission Number:	The particular parts of the original submission I/we support /oppose are:	My/our position on the original submission is:	The reasons for my/our support/ opposition to the original submission are:	Allow or disallow the original submission (in full or in part)	Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point
Timaru District Council	42.36	Modify NFL-S6 to allow for sufficient depth. Amend NFL-S6 Earthworks: Earthworks shall comply with all of the following: 1. the depth of the earthworks shall not exceed <del>1m</del> <u>2m</u> below the original surface of the ground; and	Support	Agree that 2m is a sufficient depth	Allow	Insert amendment as per the submission point
Timaru District Council	42.46	Due to climate change, the risk associated with wildfires is expected to increase across many parts of the District. Additionally, such risks further increase when vegetation planting occurs in close proximity to where people live and work. This matter is not sufficiently addressed in the	Oppose	Fire is captured within the the National Planning Standards definition of <b>Natural Hazard</b> . Any associated policies or rules regarding fire should sit within	Disallow	Any new policies and rules regarding fire should be contained in the Natural Hazard chapter, as this hazard applies to all areas, not just the General Rual Zone.

		PDP. A new policy and rule and changes to the introduction of this chapter are suggested to capture this.		this chapter. NH-P1 refers to "taking into consideration the effects of climate change...". NH-P3 is titled Role of natural features and vegetation in hazard mitigation. The risk of wildfire applies to all zones, not just GRUZ.		
Royal Forest and Bird Protection Society	156.20	Delete the definition of <b>Improved Pasture</b> , and include a new definition as follows: <del>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.</del> means an area where indigenous vegetation has been fully removed and the vegetation converted to exotic pasture or crops at the time this plan was written, and that has been mapped.	Oppose	The notified definition is the definition used in the NPS for Freshwater Management 2020, therefore for consistency the same definition should be used. Also requiring the area to be mapped is unnecessary, inappropriate and cost prohibitive.	Disallow	Retain the notified definition
Royal Forest and Bird Protection Society	156.21	Add Improved Pasture to the Planning Maps.	Oppose	Requiring mapping of improved pasture is	Disallow	No action required if relief sought is disallowed

				unnecessary, inappropriate and cost prohibitive.		
Royal Forest and Bird Protection Society	156.2 2	Amend <b>Indigenous Vegetation</b> definition as follows: means <u>a community of</u> vascular <del>and nonvascular</del> plants, <u>mosses and/or lichens or fungi</u> that, <del>in relation to a particular area,</del> <u>includes species</u> <del>are</del> native to the ecological district, <del>in which that area is located.</del> <u>The community may include exotic species.</u>	Oppose	The notified definition is the definition used in the NPS Indigenous Biodiversity, therefore for consistency the same definition should be used.	Disallow	Retain the notified definition
Royal Forest and Bird Protection Society	156.1 06	Add a new policy to the ECO - Ecosystems and Indigenous Biodiversity Chapter, as follows: <u>ECO-PX Outside of SNAs and sensitive areas provide for low impact activities that may have less than minor adverse effects on indigenous biodiversity values, where these are of wider environmental or community benefit, or enable existing activities.</u>	Support	We agree that there should be policy direction for indigenous biodiversity clearance outside SNAs and sensitive areas.	Allow in part	Insert new policy, or wording with similar intent. We do not support the mapping of improved pasture for reasons outlined previously.
Royal Forest and Bird Protection Society	156.1 16	Add a new rule/s to the ECO - Ecosystems and Indigenous Biodiversity Chapter, regarding general indigenous vegetation clearance that maintains indigenous biodiversity outside	Support	With a new policy regarding indigenous biodiversity clearance outside SNAs and sensitive	Allow in part	Permit vegetation clearance in these other areas and have limits on indigenous vegetation clearance. As per the associated policy reasoning we do not support the mapping of improved pasture/fully converted farmland.

		of sensitive areas and SNAs.		areas, it follows there should be an associated rule.		
Penny Nelson, DirectorGeneral of Conservation Tumuaki Ahurei	166.6	Delete the definition of <b>Department of Conservation Activity</b> and replace with the new definition as follows: <u>Conservation Activity Means the use of land for any activity undertaken for the purposes of management, maintenance and enhancement of ecological values for indigenous vegetation and fauna and their habitats. Examples of component activities of conservation are: • Restoration planting • Pest and weed control • Track construction and maintenance • Fencing.</u>	Support	Agree that many other stakeholders undertake conservation activities	Allow	Replace Department of Conservation Activity with the proposed definition for Conservation Activity. Any subsequent amendments as necessary.
Horticulture New Zealand	245.4 6	Amend EI-R27 Buildings or structures within the National Grid Yard	Support	Agree that seeking to limit reticulation and storage of water in canals, dams or reservoirs including for irrigation purposes in the National Grid Yard is an unreasonable limitation.	Allow	Replace notified EI-R27 with submitters proposed amendments

Horticulture New Zealand	245.47	Amend the title of EI-R28 as follows: EI-R28 Earthworks, and land disturbance <del>for the installation of fence posts</del> within the National Grid Yard.	Support	Agree that the rule should apply to all earthworks and land disturbance	Allow	Replace notified EI-R28 with submitters proposed deletion
Horticulture New Zealand	246.65	Amend SUB-O3 Rural subdivision 4. <del>minimise-avoid</del> reverse sensitivity effects on <u>primary production including</u> intensive primary production.	Support	Agree that this objective should relate to all primary production	Allow	Replace notified SUB-O4 with submitters proposed amendments
Horticulture New Zealand	245.68	Amend SUB-P5 Reverse Sensitivity as follows: Only allow subdivision that does not result in reverse sensitivity effects that would compromise the operation of regionally significant infrastructure/facilities and legally established <u>primary production including</u> intensive primary production.	Support	Agree that this policy should related to all primary production	Allow	Replace notified SUB-P5 with submitters proposed amendments
Horticulture New Zealand	245.80	Amend EW-S5 as follows: EW-R5 Earthworks in proximity of the National Grid <del>and/or a 66kV electricity distribution line</del> , excluding earthworks for:	Support	Agree there is no policy framework for the inclusion of 66kV lines	Allow	Delete all references to and associated setbacks for 66kV lines
Opuha Water Limited	181.58	Amend SASM-O2 Access and Use as follows: <del>Where appropriate</del> , Kāti Huirapa are able to access, maintain and use resources and areas of	Support	Agree that only access should be given to private property where appropriate, and agreed upon by the	Allow	Insert amendment as per the submission point.

		cultural value within identified Sites and Areas of Significance to Kāti Huirapa.		land owners.		
Te Tumu Paeroa, Office of the Māori Trustee	240.6	Amend SASM-O2 as follows: SASM-O2 Access and use Kāti Huirapa are able to, <b>in agreement with affected landowners</b> , access, maintain and use resources and areas of cultural value within identified Sites and Areas of Significance to Kāti Huirapa.	Support	Agree that access can only be obtained onto private properties in agreeance with affected landowners.	Allow	Insert amendment as per submission point.
Dairy Holdings Limited	89.9	Amend SASM-R1 Earthworks not including quarrying and mining as follows: [...] 2. Wāhi Taoka and Wai Taoka Overlay Permitted Where: PER-1 The earthworks are for <b>ancillary rural earthworks or are for</b> the purpose of maintenance, repair, or replacement, of any of the following: 1. existing fencing; or 2. existing tracks or roads; or 3. existing reticulated stock water systems including troughs; or 4. existing natural hazard mitigation works; and [...]	Support	Agree that ancillary rural earthworks are needed for basic maintence on farm.	Allow	Inset amendment as per submission point.