



# Federated Farmers of New Zealand

## Response to Memorandum Redrafting Objectives – Queenstown Lakes District Council Proposed District Plan

30/03/2016



## Response to Memorandum Redrafting Objectives – Queenstown Lakes District Council Proposed District Plan

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This is a response to the Memorandum Redrafting Objectives for the Queenstown Lakes District Council Proposed District Plan, in the matter of Hearing Streams 1A and 1B – Introduction, Strategic Direction and Urban Development, issued 18 March 2016.

Where Federated Farmers does not provide feedback on the redrafted objectives it stands by its original submission.

| Provision         | Section of plan                      | Proposed Amendment  | Support/Oppose | Reason for submission   |
|-------------------|--------------------------------------|---|----------------|---|
| Objective 3.2.1.4 | Chapter 3:<br>Strategic<br>Direction | <del>Recognise and provide for</del> The significant socioeconomic benefits of tourism activities across the District <u>are provided and enabled.</u>  | Support        | Federated Farmers supports the intention to provide for and enable the socioeconomic benefits of tourism activities.<br><br>These activities do and should occur in the rural zones as complementary to primary production, and can underpin farming activities.<br><br>We consider these activities should be provided for and enabled unless there is a significant adverse effect on rural production activities, and given other objectives pertaining to the importance of farming in the rural areas are maintained, we support this objective as reworded. |
| Objective 3.2.1.5 | Chapter 3:<br>Strategic<br>Direction | <del>Enable the</del> Development of innovative and sustainable enterprises that contribute to diversification of the District's economic base and create employment opportunities.   | Support        | A broad based economy provides for sustainable socioeconomic wellbeing. In the rural areas, this diversity can underpin primary production activities, where these activities do not significantly adversely impact the farming activities that underpin the rural landscape.   |
| Objective 3.2.1.6 | Chapter 3:<br>Strategic<br>Direction | <del>Recognise the potential for</del> <u>Diversification of land use in rural areas providing to diversify their land use beyond the strong productive value of farming, provided a sensitive approach is taken to adverse effects on rural amenity, landscape character, healthy ecosystems, and Ngai Tahu values, rights and interests are avoided, remedied or mitigated.</u> | Oppose in part | While Federated Farmers supports the intention to provide for diversification of land use where the potential adverse impacts on specified activities are appropriately considered, and avoided, remedied or mitigated, we oppose the removal of the reference to farming activities. As this Objective relates specifically to the rural areas of the District, we consider it should reflect the intent of other Objectives by referring to the potential for adverse impacts in respect to   |

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|                   |                                |   |                 | <p>farming activities (particularly reverse sensitivity)</p> <p>Subsequently we seek some changes to the proposed Objective (<b>as highlighted below</b>) or words to similar effect;</p> <p><u>Recognise the potential for Diversification of land use in rural areas providing to diversify their land use beyond the strong productive value of farming, provided a sensitive approach is taken to adverse effects on farming activities</u>, rural amenity, landscape character, healthy ecosystems, and Ngai Tahu values, rights and interests <u>are avoided, remedied or mitigated.</u></p>   |
| Objective 3.2.4.1 | Chapter 3: Strategic Direction | <p><del>Promote development and activities that sustain or enhance the life-supporting capacity of air, water, soil and ecosystems. Ensure development and activities maintain indigenous biodiversity, and sustain or enhance the life-supporting capacity of air, water, soil and ecosystems.</del></p> | Support in part | <p>The proposed re-wording better explains the intent to provide for development while ensuring indigenous biodiversity, and the life-supporting capacity of air, water, soil and ecosystems, are maintained, sustained or enhanced as appropriate.</p> <p>However, Federated Farmers has some concerns that the proposed wording changes council's role from promoting positive activities to a more onerous regulatory approach. Therefore we seek amendments to the proposed Objective to retain the original intention of the Objective (as highlighted below) or words to similar effect;</p> <p><del>Promote development and activities that sustain or enhance the life-supporting capacity</del></p> |

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|                   |                                      |  |                | of air, water, soil and ecosystems. <b>Ensure</b><br><b>Promote</b> development and activities <b>that</b><br><u>maintain indigenous biodiversity, and sustain or enhance the life-supporting capacity of air, water, soil and ecosystems.</u>  |
| Objective 3.2.4.4 | Chapter 3:<br>Strategic<br>Direction | Avoid <u>the spread of wilding exotic vegetation with the potential to spread and naturalise. to protect nature conservation values.</u>                                       | Support        | Federated Farmers agrees that it is the spreading of wilding exotic vegetation which is the key issue to address, and we consider the proposed re-wording better identifies this concern.   |
| Policy 3.2.4.4.1  | Chapter 3:<br>Strategic<br>Direction | <del>That</del> <u>Prohibit</u> the planting of identified exotic vegetation with the potential to spread and naturalise <del>is banned.</del>                                 | Oppose in part | Federated Farmers agrees with the proposal to reduce or eliminate the spreading of wilding exotic vegetation as proposed under Objective 3.2.4.4. However, we do not consider that prohibited status is required. We would support a rules based approach to addressing the risk of spreading of wilding exotic vegetation rather than restrictions on planting, and we seek that this policy is reworded as follows ( <b>as highlighted below</b> ) or words to similar effect;<br><del>That Prohibit</del> <u>The risks associated with the planting of identified exotic vegetation with the potential to spread and naturalise are appropriately managed is banned.</u> |
| Objective 3.2.5.1 | Chapter 3:<br>Strategic<br>Direction | <u>Protection of the natural character quality of the Outstanding Natural Features and Landscapes and Outstanding Natural Features from inappropriate subdivision, use and</u> | Support        | Federated Farmers supports the focus on inappropriate subdivision, use and development.   |

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|                   |                                      | development.   |                |   |
| Objective 3.2.5.2 | Chapter 3:<br>Strategic<br>Direction | <del>Minimise the adverse landscape effects of subdivision, use or development in specified Rural Landscapes. Maintain and enhance the landscape character of the Rural Landscape Classification. The quality and visual amenity values of the Rural Landscapes are maintained and enhanced, whilst acknowledging the potential for managed and low impact change.</del> | Support        | Federated Farmers supports the focus on maintaining and enhancing the quality and visual amenity values of the Rural Landscapes while the potential for low impact change is acknowledged. The proposed re-wording better reflects what we consider should be the overall intent of the Objective.  |
| Objective 3.2.5.4 | Chapter 3:<br>Strategic<br>Direction | <del>Recognise there is a The finite capacity for residential activity in of rural areas to absorb residential development is considered so as to protect# the qualities of our landscapes are to be maintained.</del>   | Support        | Federated Farmers agrees that the finite capacity of the rural areas to absorb residential development should be a consideration, and the proposed re-wording of the Objective provides clarity.  |
| Objective 3.2.5.5 | Chapter 3:<br>Strategic<br>Direction | <del>Recognise that agricultural land use is fundamental to the character of our landscapes. The ongoing viability of agricultural land use is provided for and opportunities for diversification are enabled on the basis activities maintain and enhance nature conservation values.</del>   | Support        | In our initial submissions, Federated Farmers supported the initial Objective as worded, as we considered it important that agricultural land use is not only to be expected and provided for in the rural areas of the District, but that this land use is also recognised as overall positively contributing to the visual and other amenity values that are inherently attractive to those who live in, work in and visit the District.<br><br>In Federated Farmers view, the original wording of the Objective captured the |

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|                 |                      |  |                | <p>fundamental point that the rural landscape would look significantly different, and/or would cost significantly more to maintain, if farming was not present in the rural areas.</p> <p>However, farming in the Queenstown Lakes District is also economically underpinned by the ability for individual farmers to diversify away from farming specifically to develop complementary and compatible activities that not only take advantage of, but inherently rely on, the District's nature conservation values.</p> <p>Therefore we support the proposed re-wording of the Objective as it takes a more enabling approach to other activities while still providing for agricultural production.</p> |
| Objective 6.3.1 | Chapter 6: Landscape | <del>The District contains and values Outstanding Natural Features, Outstanding Natural Landscapes, and Rural Landscapes that require protection from inappropriate subdivision and development</del><br><u>Landscapes are managed and protected from the adverse effects of subdivision, use and development.</u> | Support        | Federated Farmers agrees with the proposed Objective's focus on 'managing and protecting' from the adverse effects, rather than a reliance on protecting from 'inappropriate' subdivision and development.   |
| Policy 6.3.1.1  | Chapter 6: Landscape | The amendment amalgamates proposed policies 6.3.1.1 and 6.3.1.2 with re-numbering of subsequent policies.  | Support        | The proposed amendments simplify the policies without changing the overall intent.   |
| Policy 6.3.1.4  | Chapter 6: Landscape | The amendment proposes matters against which urban subdivision and   | Support        | Federated Farmers agrees the proposed amendments both provide greater clarity and  |

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|                 |                      | urban development in the Rural Zones will be considered.  |                | certainty to plan users and are relevant.  |
| Objective 6.3.2 | Chapter 6: Landscape | <del>Avoid adverse cumulative effects on landscape character and amenity values caused by incremental subdivision and development</del><br><u>Landscapes are protected from the adverse cumulative effects of subdivision, use and development.</u>   | Support        | Federated Farmers agrees the proposed amendments simplify the Objective while retaining the initial intent.  |
| Objective 6.3.5 | Chapter 6: Landscape | <del>Ensure subdivision and development does not degrade landscape character and diminish visual amenity values of the Rural Landscapes (RLC).</del><br><u>Subdivision, use and development maintains and enhances the quality and visual amenity values of the Rural Landscapes (RLC).</u> | Support        | Federated Farmers agrees the proposed amendments provide greater clarity by specifically referring to the requirement to 'maintain and enhance' rather than the requirement to 'not degrade' as per the initial wording. |
| Policy 6.3.5.5  | Chapter 6: Landscape | Encourage development to utilise shared accesses and infrastructure, and to locate within the parts of the site where <del>they it will be least visible, and have the least</del> <u>minimise</u> disruption to the landform and rural character.  | Support        | Federated Farmers considers the proposed amendments simplify the policy while retaining the overall intent.  |
| Objective 6.3.6 | Chapter 6: Landscape | <del>Protection, maintain maintenance or enhancement of the landscape quality, character and visual amenity provided by of the lakes and rivers and their margins. from the adverse effects of structures and activities.</del>   | Support        | Federated Farmers agrees the proposed amendments simplify the Objective while retaining the overall intent.  |

