



Federated Farmers of New Zealand

Further Submissions – Queenstown Lakes District Council Proposed District Plan

18/12/2015



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These are further submissions to the Queenstown Lakes District Council Proposed District Plan.

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

We wish to be heard in support of our submission. If others make a similar submission, I will consider presenting jointly with them at a hearing.

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

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

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Upper Clutha Environmental Society (Inc)	145.5	57-3 Strategic Direction	Submitter seeks that a comprehensive list of unformed legal roads are mapped and clearly labelled on the District Plan maps.	Oppose	The submitter's concerns are already sufficiently addressed by the Walking Access Commission, including maps. Replicating these maps in the District Plan would be unnecessary, and may require updates to the plan as the maps are subject to change.
Vodafone NZ	179.5	54-2 Definitions > 56 - 2.2Definitions	Submitter seeks an amendment to the definition for Minor Upgrading to include: <ul style="list-style-type: none"> <input type="checkbox"/> <i>An increase by no more than 30% in any dimension for utility poles, structures, or cabinets or antenna.</i> <input type="checkbox"/> <i>Addition of lines and ancillary equipment to existing poles.</i> 	Oppose	Where the upgrading of infrastructure requires a greater footprint, there is potential for it to encroach upon other legitimate land uses, including primary production. In these instances we consider that Council should consider the upgrade to be more than minor.
Vodafone NZ	179.7	54-2 Definitions > 56 - 2.2Definitions	Submitter seeks an amendment to the definition of Utilities to include antennas and lines (including cables).	Oppose	We consider there is an important distinction between the location specific nature of utilities, and the lines and cables extending from those utilities. This can include impositions upon other legitimate land use, and we consider antennas and lines should be treated in a different manner in relation to resource management.
Vodafone NZ	179.8	57-3 Strategic Direction	Submitter seeks a new policy: <p><i>In recognition of the benefits of utilities and the significant investment in utilities, enable utilities and infrastructure to be developed, maintained, upgraded and operated provided that, as a result of its location,</i></p>	Oppose	The proposed policy affords too much protection to utilities, particularly in relation to upgrading, where the impacts on other productive activities and values should be appropriately considered, in relation to each specific context (particularly in relation to upgrading of utilities).

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			<p><i>and design;</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> <i>the adverse effects on significant natural and physical resources and cultural values are avoided, or where this is not practicable, remedied or mitigated; and</i> <input type="checkbox"/> <i>other adverse effects on the environment are appropriately controlled.</i> <input type="checkbox"/> <i>avoid land-uses that may result in adverse reverse sensitivity effects on telecommunication infrastructure facilities or where this is not practicable, remedied, mitigated.</i> <p><i>Enable infrastructure to be effective and efficient, especially in regard to its configuration, recognising that it may be located in</i></p>		
Vodafone NZ	179.14	1182-27 Subdivision and Development > 1253-27.5 Rules - Standards for Subdivision Activities	Seeks a new standard for subdivision.	Oppose	This is a commercial matter for the infrastructure provider and sub-divider; not an issue to be addressed in the District Plan.
Vodafone NZ	179.20	26-30 Energy and Utilities > 30- 30.2	Proposes a new objective	Oppose	We consider there is an important distinction between operation and maintenance on one hand, and upgrading on the other; by including

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		Objectives and Policies > 59-30.2.6 Objective 6 > 60- 30.2.6.1			upgrading of utilities the objective goes beyond what is required or necessary.
Vodafone NZ	179.22	26-30 Energy and Utilities > 30- 30.2 Objectives and Policies > 59-30.2.6 Objective 6 > 64- 30.2.6.5	Seeks amendment of the wording of the objective.	Oppose	We consider there is an important distinction between operation and maintenance on one hand, and upgrading on the other; by including upgrading of utilities the objective goes beyond what is required or necessary.
Spark Trading NZ Limited	191.4	54-2 Definitions > 56 - 2.2Definitions	Submitter seeks an amendment to the definition for Minor Upgrading to include: <input type="checkbox"/> <i>An increase by no more than 30% in any dimension for utility poles, structures, or cabinets or antenna.</i> <input type="checkbox"/> <i>Addition of lines and ancillary equipment to existing poles</i>	Oppose	Where the upgrading of infrastructure requires a greater footprint, there is potential for it to encroach upon other legitimate land uses, including primary production. In these instances we consider that Council should consider the upgrade to be more than minor.
Spark Trading NZ Limited	191.6	54-2 Definitions > 56 - 2.2Definitions	Submitter seeks an amendment to the definition of Utilities to include antennas and lines (including cables).	Oppose	We consider there is an important distinction between the location specific nature of utilities, and the lines and cables extending from those utilities. This can include impositions upon other legitimate land use, and we consider antennas and lines should be treated in a different manner in relation to resource management.

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Spark Trading NZ Limited	191.11	1182-27 Subdivision and Development > 1253-27.5 Rules - Standards for Subdivision Activities > 1266-27.5.4 Standards related to servicing and infrastructure	Seeks a new standard for subdivision.	Oppose	This is a commercial matter for the infrastructure provider and sub-divider; not an issue to be addressed in the District Plan.
Spark Trading NZ Limited	191.12	1182-27 Subdivision and Development > 1253-27.5 Rules - Standards for Subdivision Activities > 1266-27.5.4 Standards related to servicing and infrastructure	Seeks a new standard for subdivision.	Oppose	This is a commercial matter for the infrastructure provider and sub-divider; not an issue to be addressed in the District Plan.
Spark Trading	191.20	26-30 Energy	Amend Policy 30.2.6.5	Oppose	We consider there is an important distinction

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NZ Limited		and Utilities > 30- 30.2 Objectives and Policies > 59-30.2.6 Objective 6 > 64-30.2.6.5			between operation and maintenance on one hand, and upgrading on the other; by including upgrading of utilities the objective goes beyond what is required or necessary.
NZIA Southern and Architecture + Women Southern	238.128	771-21Rural Zone > 772-21.1 Zone Purpose	Seeks deletion of the following sentence from the Zone Purpose: <i>For this reason, it is important to acknowledge the potential for a range of alternative uses of farm properties that utilise the qualities that make them so valuable.</i>	Oppose	It is important that the plan provide for alternative land use in the rural area, where this is consistent with rural values. This provides for economic sustainability of primary production.
PowerNet Limited	251.1	57-3Strategic Direction > 59-3.2Goals, Objectives and Policies > 60-3.2.1Goal 1. > 73-3.2.1.5Objective 5	Seeks amendments to the objective to provide for electricity transmission networks and the development of infrastructure.	Oppose	<ol style="list-style-type: none"> 1. While the maintenance and operation of <i>existing</i> infrastructure should be reasonably enabled, the <i>development</i> of infrastructure can adversely impact other important land uses. Therefore development should be considered as a separate matter. 2. We support the exclusion of electricity transmission networks from this objective as a large proportion of these networks occur on private land, an important distinction. Further, electricity transmission is addressed specifically through the National Policy Statement for Electricity Transmission, and excludes local lines.

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PowerNet Limited	251.3	57-3 Strategic Direction > 59-3.2Goals, Objectives and Policies	<p>Submitter seeks the insertion of a new goal and associated policies to this chapter:</p> <p><i>3.2.8 Goal –Providing for the ongoing operation and growth of regionally significant infrastructure.</i></p> <p><i>Objective 3.2.8.1 Recognise that the functional or operational requirements of regionally or nationally significant infrastructure can necessitate a particular location.</i></p> <p><i>Policy 3.2.8.1.1 Enable the continued operation, maintenance and upgrading of regionally and nationally significant infrastructure and associated activities.</i></p> <p><i>Policy 3.2.8.1.2 Where practicable, mitigate the impacts of regionally and nationally significant infrastructure on outstanding natural landscapes and outstanding natural features.</i></p>	Oppose in part	<p>We oppose Policy 3.2.8.1.1. We consider there is an important distinction between operation and maintenance on one hand, and upgrading on the other; by including upgrading of infrastructure the policy goes beyond what is required or necessary. In respect to infrastructure located on or near private land, the proposed policy unnecessarily and adversely impacts those landowners. Appropriate protection is already afforded by way of the New Zealand Electrical Code of Practice 34:2001 to other lines distribution companies. While Council is required to 'give effect' to the National Policy Statement for Electricity Transmission, this only applies to the National Grid and government made a clear decision to not extend it to other infrastructure in the way proposed by this submitter here.</p>
PowerNet Limited	251.11	26-30 Energy and Utilities > 27-30.1 Purpose	<p>Seeks deletion of reference to the adverse effects of utilities on <i>surrounding land uses, some of which have been established long before the network utility.</i></p>	Oppose	<p>It is important that Council considers the impact of utilities on surrounding land uses. The sentence specifically acknowledges that often legitimate existing land users have had to accommodate subsequent network utilities. This generally comes at a cost or inconvenience and it is appropriate for this to be acknowledged.</p>
PowerNet	251.15	26-30 Energy	Seeks the addition of a new policy;	Oppose	We do not consider there is a need for the

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Limited		and Utilities > 30-30.2 Objectives and Policies > 59-30.2.6 Objective 6 > 63-30.2.6.4	<i>Provide for the sustainable development, use, upgrading and maintenance of electricity distribution networks, including lines, transformers, substations and switching stations and ancillary buildings.</i>		additional policy. In particular we oppose the reference to upgrading; there is an important distinction between operation and maintenance on one hand, and upgrading on the other; by including upgrading of utilities the objective goes beyond what is required or necessary. This goes beyond the requirements of the National Policy Statement for Electricity Transmission and there is no similar requirement to provide protection for lines distribution networks. The NZECP34:2001 provides sufficient provision to address safety and maintenance considerations for lines distribution assets.
Evan Alty	339.92	26-33 Indigenous Vegetation and Biodiversity > 28-33.2 Objectives and Policies > 39-33.2.2 Objective 2	Seeks the addition of a new policy; <i>Significant adverse effects of the use and development on habitats of indigenous birds in wetlands, beds of rivers and lakes and their margins for breeding, roosting, feeding and migration are avoided and other effects are avoided, remedied or mitigated.</i>	Oppose	Significant wetlands are addressed at the regional level, through the Otago Regional Council Regionally Significant Wetlands inventory. Where a wetland does not meet the criteria for this inventory, we consider the outcomes sought are better achieved through non-regulatory advice and encouragement.
Evan Alty	339.100	26-33 Indigenous Vegetation and Biodiversity > 28-33.2	Seeks that the following is incorporated into the policy; <i>Ensure indigenous vegetation removal does not adversely affect the natural character of the margins of water ways</i>	Oppose	There is no degree of significance; requiring no adverse effects on natural character would set a regulatory bar that is impractical, impossible to meet and difficult to police.

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		Objectives and Policies > 43-33.2.3 Objective 3 > 49-33.2.3.6			
Evan Alty	339.120	26-33 Indigenous Vegetation and Biodiversity > 80-33.5 Rules - Standards for Permitted Activities > 91-33.5.9	Seeks amendment to the standard; <i>Does not involve exotic tree or shrub planting, or establishment of pasture or crop.</i>	Oppose	The standards should provide for the establishment of pasture and crop.
Evan Alty	339.126	174-34 Wilding Exotic Trees > 175-34.1 Purpose	Seeks recognition that wilding conifers can also affect water yield.	Oppose	Water yield is a regional council consideration.
Department of Conservation	373.1	54-2 Definitions > 56-2.2Definitions	Seeks amendment to the definition of 'Vegetation Clearance' to include over sowing.	Oppose	Over sowing should not in and of itself be considered vegetation clearance. Some degree of significance is required; we would rather the concerns are addressed through specific rules rather than through amendment to the definition of 'Vegetation Clearance'.
Department of Conservation	373.3	54-2Definitions > 56-2.2Definitions	Include a definition of 'no net loss' as follows: <i>No overall reduction in biodiversity as</i>	Oppose in part	Accounts for biodiversity as a 'stock' of net biodiversity values. We would rather attention is given specifically to the protection of

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			<i>measured by type, amount and condition.</i>		threatened species rather than the biodiversity stock overall.
Department of Conservation	373.25	26-33 Indigenous Vegetation and Biodiversity > 28-33.2 Objectives and Policies > 29-33.2.1 Objective 1 > 34-33.2.1.5	Opposes Policy 33.2.1.5	Oppose	<p>Policy 33.2.1.5 proposes to “recognise anticipated activities in rural areas such as farming and the efficient use of land and resources while having regard to the maintenance, protection or enhancement of indigenous biodiversity values”.</p> <p>Policy 33.2.1.5 is an important policy for the rural area, providing balance and recognising that rural production requires some flexibility.</p> <p>This is particularly important in the Queenstown Lakes District where the broader benefits of rural production are often underestimated, and are at risk of being over-regulated.</p>
Department of Conservation	373.35	26-33 Indigenous Vegetation and Biodiversity > 28-33.2 Objectives and Policies > 39-33.2.2 Objective 2 > 42-33.2.2.3	Delete Policy 33.2.2.3.	Oppose	Federated Farmers considers it is important that Council specifically recognise and provide for these low to no impact activities in the rural areas, and we seek that the policy is retained.
Department of	373.37	26-33	Replace Objective 33.2.3 with the	Oppose in part	We support the focus on encouraging

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Conservation		Indigenous Vegetation and Biodiversity > 28-33.2 Objectives and Policies > 43-33.2.3 Objective 3	<p>following Objective:</p> <p><u>Ensure the efficient use of land, including ski-field development, farming activities and infrastructure improvements, do not reduce the District's indigenous biodiversity values.</u></p> <p><i>Encourage protection and enhancement of biodiversity values located on unproductive land within the district.</i></p>		protection and enhancement of biodiversity values on land deemed to be unproductive. However, developing assessment criteria for ascertaining what may be considered 'unproductive land' is problematic. Subsequently, we seek the retention of the Objective as proposed, and that the submitter's concerns be addressed through methods advising and encouraging the voluntary identification of unproductive areas with support given to private landowners to ensure the protection or enhancement of biodiversity values in these areas.
Department of Conservation	373.51	26-33 Indigenous Vegetation and Biodiversity > 54-33.3 Other Provisions and Rules > 72-33.3.4 Exemptions	Seeks the deletion of 33.3.4.3 and an amendment to point 33.3.4.3 to broaden the scope to include Significant Natural Areas.	Oppose	Oppose broadening the scope to include Significant Natural Areas. We consider point 33.3.4.3 provides for reasonable use of the land, and that the allowances are also reasonable for SNAs.
Department of Conservation	373.54	26-33 Indigenous Vegetation and Biodiversity > 80-33.5 Rules - Standards for	Seeks that there is no permitted standard allowing vegetation clearance within an area determined as a Significant Natural Area.	Oppose	SNAs within the District often occur on private land, including farmland. Management of SNAs on private land requires a balance between providing reasonable flexibility around use of that land, while maintaining the values in the SNAs overall. We consider the permitted activity approach achieves this balance.

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		Permitted Activities > 90-33.5.8			
Glen Dene Ltd	384.4	81-6 Landscape	Highlights the need for a reasonable permitted activity threshold for earthworks in the rural zone. Highlights concerns farmers have that only parts of a farm may meet ONL criteria, and that the associated maps and rules should reflect this.	Support	Submitter accurately identifies the need for reasonable permitted activity earthworks standards, and the concerns farmers have expressed around the accuracy of, and implications around, mapping of ONLs on farm land.
Sam Kane	590.1	57-3 Strategic Direction > 59-3.2Goals, Objectives and Policies > 92-3.2.4Goal 4 > 99- 3.2.4.4 Objective 4	Seeks rewording of Objective 3.2.4.4 as follows (or words to similar effect): <i>Avoid or manage the effects of, exotic vegetation with the potential to spread and naturalise.</i>	Support	Appropriately identifies that risk of spread is a critical consideration in relation to exotic vegetation.
Straterra	598.21	57-3Strategic Direction > 59-3.2Goals, Objectives and Policies > 109-3.2.5Goal 5 > 119-3.2.5.5Objectiv e 5 > 120-3.2.5.5.1	Seeks deletion of Policy 3.2.5.5.1	Oppose	It is important that agricultural land use is considered the primary focus of the rural areas of the District, particularly given the role of farming and farmers to the maintenance of the district's cultural, economic and social wellbeing, and the potential for tensions if farming activities are not appropriately provided for. The policy should therefore be retained.

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Straterra	598.22	57-3Strategic Direction > 59-3.2Goals, Objectives and Policies > 109-3.2.5Goal 5 > 119-3.2.5.5Objectiv e 5 > 121-3.2.5.5.2	Seeks amendment to Policy 3.2.5.5.2, to state that the retention of the character of rural areas 'may be', rather than 'is often' dependent on the ongoing viability of farming.	Oppose	The submitter seeks to reduce the recognition of the contribution farming makes to the District's character; farming is in turn reliant on the ability to adapt reasonably to economic pressures. The proposed policy sufficiently recognises the importance of farming to the values in the District and the original proposed wording should be retained.
Te Anau Developments Limited	607.35	771-21Rural Zone > 773-21.2Objectives and Policies > 820-21.2.11 Objective - 11 > 822-21.2.11.2	Seeks objective is amended from: <i>Protect rural amenity values, and amenity of other zones from the adverse effects that can arise from informal airports.</i> ...to: <i>Protect existing informal airports from incompatible land use activities.</i>	Oppose	Within the rural zone, the focus should be to ensure informal airports are compatible with the primary uses of the rural zone; particularly farming and associated activities. It should not be required that rural production activities should demonstrate compatibility with informal airports.
Upper Clutha Track Trust	625.5	8-General DP Review Comments	Seeks that all unformed legal roads shown in the LINZ cadastral database are included in District Plan maps.	Oppose	The submitter's concerns are already sufficiently addressed by the Walking Access Commission, including maps. Replicating these maps in the District Plan would be unnecessary, and may require updates to the plan as the maps are subject to change.
Upper Clutha Track Trust	625.9	57-3Strategic Direction > 59-3.2Goals, Objectives and	Insert new Policy 3.2.8.1.2:To discourage the closure of unformed legal roads.	Oppose	There are already significant obligations placed upon those seeking to close an unformed legal road, including the requirement to publicly notify. The submitter, Council and

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		Policies			all other interested parties are able to provide views into these existing processes. Discouraging the closure of unformed legal roads in a policy adds little to the current processes while restricting the potential for a balanced discussion around each application, on a case by case basis.
Upper Clutha Track Trust	625.10	57-3Strategic Direction > 59-3.2Goals, Objectives and Policies	Insert new Policy 3.2.8.1.1: That trails will predominantly occur within the rural parts of the District, in particular within the Outstanding Natural Landscapes and Outstanding Natural Features.	Oppose	The development of tracks should be guided by demand, in conjunction with processes that seek to ensure concerns around the impacts on other legitimate land uses are addressed. The proposed policy is unnecessary and undermines the opportunity for a balanced assessment of the need for new tracks, and the concerns of other land users.
Aurora Energy Limited	635.1	54-2Definitions > 56-2.2 Definitions	The submitter proposes a new definition: <i>Critical Electricity Line</i> <i>Electrical lines throughout the region that are not covered by National Policy Statement on Electricity Transmission and that are or have the potential to be crucial to the region's quality, reliability and security of electrical supply. These electricity lines are crucial because they</i> <i>contribute to the social and economic wellbeing and health and safety of the region and are lines that:</i>	Oppose in part	Federated Farmers supports Council giving effect to the National Policy Statement on Electricity Transmission (NPSET). However the requirements set out under the NPSET apply only to the National Grid, or assets owned by Transpower, not distribution lines (or local lines), even those deemed to meet the criteria outlined by the submitter. We consider it is reasonable to for the district plan to note that the following is relevant to local lines, however; <i>Compliance with NZECP 34:2001 as amended from time to time is mandatory for buildings, earthworks, and when using machinery or equipment within close proximity to any electric</i>

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			<p><i>i. Supply essential public services; or</i></p> <p><i>ii. Supply large industrial or commercial electricity consumers; or</i></p> <p><i>iii. Supply high numbers of consumers; or</i></p> <p><i>iv. Are difficult to replace with an alternative electricity supply if they are compromised.</i></p> <p><i>Specified distances from Critical Electricity Lines are to be measured from a point directly below the centreline of the line or cluster of lines, as shown in Fig 1 below.</i></p> <p><i>Fig 1 (See submission for a diagram of Figure 1).</i></p> <p><i>While only critical electricity lines are identified on the planning maps, works in close proximity to all electric lines can be dangerous. Compliance with NZECP 34:2001 as amended from time to time is mandatory for buildings, earthworks, and when using machinery or equipment within close proximity to any electric lines.</i></p>		<i>lines.</i>
Aurora Energy Limited	635.3	54-2Definitions > 56-2.2Definitions	<p>Insert definition of “Electricity Distribution”</p> <p><i>Electricity Distribution</i></p> <p><i>Means the conveyance of electricity via electricity distribution lines, cables, support structures, substations,</i></p>	Oppose in part	Federated Farmers supports the intention to specifically define electricity transmission lines that are not part of the National Grid, for the purpose of developing rules relevant to these transmission assets. As we noted in our original submission there was no definition

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			<i>transformers, switching stations, kiosks, cabinets and ancillary buildings and structures, including communication equipment, by a network utility operator. For the avoidance of doubt, this includes, but is not limited to Aurora Energy Limited assets shown on the planning maps.</i>		<p>specifically for transmission assets that were not part of the National Grid, and this creates some confusion.</p> <p>However we oppose electricity distribution infrastructure being provided the same regulatory treatment as the National Grid. The National Policy Statement on Electricity Transmission (NPSET) requirements specifically apply only to the National Grid, or assets owned by Transpower, not distribution lines/infrastructure (or local lines/infrastructure).</p> <p>Nor do we consider it relevant to specifically list the owner (Aurora) within the definition. The submitter's concerns can be addressed simply by defining the electricity transmission network and noting it is distinct to the National Grid.</p>
Aurora Energy Limited	635.4	54-2Definitions > 56- 2.2 Definitions	<p>Insert a definition of "electricity distribution line corridor":</p> <p><i>Electricity Distribution Line Corridor Means a buffer area around electricity distribution lines, support structures and substations operated by a network utility operator. For the avoidance of doubt, this applies to Aurora Energy Limited's assets shown on the planning maps.</i></p>	Oppose	<p>The submitter is seeking to expand the scope of the NPSET by seeking that the district plan treat local electricity transmission/distribution assets in a similar manner to the National Grid. However, the NPSET specifically refers to assets owned by Transpower, and specifically excludes local lines.</p> <p>This distinction is important from a primary production perspective. Both National Grid and local transmission/distribution lines traverse private land, including large swathes of farmland, and the location, maintenance and</p>

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					<p>upgrading of these assets can significantly impact farming operations.</p> <p>We agree with the submitter's position that a separate definition should be adopted for Electricity Distribution, and that an advisory note is included in the district plan noting that compliance with NZECP 34:2001 as amended from time to time is mandatory for buildings, earthworks, and when using machinery or equipment within close proximity to the electricity distribution network.</p> <p>However, beyond this we see no good reason why the district plan should develop provisions which seek to apply the NPSET to local lines. Where the submitter has concerns with the application of NZECP 34:2001 in respect to local lines, they are better addressing these with the individual landowners or those working in proximity to lines.</p>
Aurora Energy Limited	635.5	54-2Definitions > 56- 2.2 Definitions	Submitter seeks an amendment to the definition of Minor Upgrading.	Oppose	Where the upgrading of infrastructure requires a greater footprint, there is potential for it to encroach upon other legitimate land uses, including primary production. In these instances we consider that Council should consider the upgrade to be more than minor.
Aurora Energy Limited	635.6	54-2Definitions > 56- 2.2 Definitions	Submitter seeks a new definition for "Regionally Significant Infrastructure"	Oppose	We see no need for an additional definition covering such a wide range of varying types of infrastructure; we prefer these are treated individually and distinct from one another, where necessary.

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					We seek that this submission and the subsequent submissions related to the specific treatment of “Regionally Significant Infrastructure” are not adopted.
Aurora Energy Limited	635.7	54-2Definitions > 56- 2.2 Definitions	Submitter seeks a new definition for “Support Structure”.	Oppose	The proposed definition conflates the National Grid and local lines. For clarity’s sake we consider the support structures referenced should be appropriately distinguished as either forming a component of the National Grid or as forming a component of the Electricity Distribution Network.
Aurora Energy Limited	635.51	26-30 Energy and Utilities > 30- 30.2 Objectives and Policies > 59-30.2.6 Objective 6 > 63- 30.2.6.4	Submitter seeks that the protections intended for the National Grid under proposed policy 30.2.6.4 are extended to include the Electricity Distribution Network.	Oppose	The NPSET specifically excludes local lines or the Electricity Distribution Network. The District Plan should also ensure that the protections intended for the National Grid are not extended to local lines or the Electricity Distribution Network, as doing so would unnecessarily require Council to address concerns between local lines companies and private landowners when these concerns are better addressed by these separate parties directly.
Aurora Energy Limited	635.61	26-30 Energy and Utilities > 83- 30.4 Rules - Activities > 93- 30.4.10	Submitter seeks that the protections intended for the National Grid under proposed Rule 30.4.10 are extended to include the Electricity Distribution Network.	Oppose	The NPSET specifically excludes local lines or the Electricity Distribution Network. The District Plan should also ensure that the protections intended for the National Grid are not extended to local lines or the Electricity Distribution Network, as doing so would unnecessarily require Council to address concerns between local lines companies and private landowners when these concerns are better addressed by

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					these separate parties directly.
Aurora Energy Limited	635.70	26-30 Energy and Utilities	Insert New Provision – Critical Electricity Lines – Land Use	Oppose	<p>The NPSET specifically excludes local lines or the Electricity Distribution Network. We see no good reason why the district plan should develop provisions which seek to apply the NPSET to local lines.</p> <p>We also consider it is inappropriate for the district plan to police NZECP 34:2001. Where the submitter has concerns with the application of NZECP 34:2001 in respect to local lines, they are better addressing these with the individual landowners or those working in proximity to lines.</p>
Aurora Energy Limited	635.71	26-30 Energy and Utilities	Insert New provisions relating to Critical Electricity Lines.	Oppose	<p>The NPSET specifically excludes local lines or the Electricity Distribution Network. We see no good reason why the district plan should develop provisions which seek to apply the NPSET to local lines.</p> <p>We also consider it is inappropriate for the district plan to police NZECP 34:2001. Where the submitter has concerns with the application of NZECP 34:2001 in respect to local lines, they are better addressing these with the individual landowners or those working in proximity to lines.</p>
Queenstown Trails Trust	671.1	57-3Strategic Direction > 59-3.2Goals, Objectives and	<p>Submitter seeks the introduction of a new goal:</p> <p><i>3.2.8: A world class network of trails that connects communities.</i></p>	Oppose	<p>We oppose the relief sought on the basis that</p> <ul style="list-style-type: none"> The submitter's concerns are already sufficiently addressed by the Walking Access Commission, including maps.

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		Policies	... and subsequent new objectives and policies.		<p>Replicating these maps in the District Plan would be unnecessary, and may require updates to the plan as the maps are subject to change.</p> <ul style="list-style-type: none"> • There are already significant obligations placed upon those seeking to close an unformed legal road, including the requirement to publicly notify. The submitter, Council and all other interested parties are able to provide views into these existing processes. Discouraging the closure of unformed legal roads in a policy adds little to the current processes while restricting the potential for a balanced discussion around each application, on a case by case basis. • The development of tracks should be guided by demand, in conjunction with processes that seek to ensure concerns around the impacts on other legitimate land uses are addressed. The proposed policy is unnecessary and undermines the opportunity for a balanced assessment of the need for new tracks, and the concerns of other land users.
Amrta Land Ltd	677.4	57-3Strategic Direction > 59-3.2Goals, Objectives and Policies	Submitter seeks the inclusion of a new strategic policy in relation to tourism.	Oppose	The proposed policy would unnecessarily elevate the status of tourism in the District, to the detriment of other legitimate land uses. We consider the submitter's concerns are already appropriately addressed in the matters relating

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					to tourism throughout the proposed plan.
Paul Kane	701.6	771-21Rural Zone > 773-21.2Objectives and Policies > 774-21.2.1Objective - 1 > 775-21.2.1.1	Submitter seeks that the word “significant” is included ahead of “indigenous biodiversity” in relation to Policy 21.2.1.1	Support	We agree that a degree of significance would be useful in respect to this policy.
Forest and Bird NZ	706.1	54-2Definitions > 56-2.2Definitions	Amend as follows: Avoid significant adverse effects on nature conservation values. In relation to adverse effects on nature conservation values that are not significant : (a) these are avoided in the first instance; (b) where they cannot be avoided, they are remedied; (c) where they cannot be remedied they are mitigated; and residual adverse effects that cannot be mitigated are offset.	Oppose	These are matters better addressed through specific policies rather than through definitions. The amendments sought do not provide for a balanced assessment of the four wellbeings, particularly economic wellbeing in the rural area. The amendments sought do not provide for active management of rural production land.
Forest and Bird NZ	706.5	54-2Definitions > 56-2.2 Definitions	Seeks the inclusion of a new definition; <i>'Margin'</i> <i>Land immediately adjacent to the bed of a river, wetland, lake or estuary</i>	Oppose	There is no need for the district plan to include a definition for margins. In addition, the definition is so vague as to be of no practical use to plan users.

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			<i>which is likely to be affected by a high water table, flooding, fluvial erosion, or sediment deposition, and often contains distinctive vegetation. The size of the margin will vary according to local site factors but may extend to the limits demarcated by natural river terraces and constructed stop banks.</i>		
Forest and Bird NZ	706.10	57-3Strategic Direction > 59-3.2Goals, Objectives and Policies > 92-3.2.4Goal 4 > 94-3.2.4.2 Objective 2	Seeks the addition of a new policy: <i>Policy 3.2.4.2.3. "Maintain indigenous biodiversity through resource consent processes"</i>	Oppose	The broad requirement for consent for the maintenance of indigenous biodiversity would impose significant costs to land users. It would also be, long term, a discouragement to the overall maintenance of indigenous vegetation to require a consent where there is some marginal potential to impact indigenous vegetation. Federated Farmers considers that, overall, developing reasonable standards for permitted activities in relation to indigenous vegetation is a significantly better approach.
Forest and Bird NZ	706.21	771-21Rural Zone > 772-21.1 Zone Purpose	Submitter seeks that the following are added to the zone purpose; Add the following: Recognise that the greatest loss of biodiversity has been on the basin floors Recognise that extensive low-intensity pastoral farming based on grassland-shrubland ecosystems contributes to the district's nature conservation,	Oppose	The proposed zone purpose, as written recognises that the primary purpose of the rural zone to enable farming activities while protecting, maintaining and enhancing the natural features of the rural area. The purpose also appropriately recognises that a wide range of productive activities occur in the Rural Zone and that there are mutually compatible and reliant industries also situated in proximity to primary production activities.

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			<p>landscape, recreation and tourism values.</p> <p>Recognise the importance of healthy tall tussock grassland for catchment water yield.</p>		<p>This recognition provides important context to the rules proposed for the rural zones.</p> <p>The submitter is seeking to relegate this essential focus on enabling farming practices where it is reasonable to do so, by elevating concerns that are either already sufficiently addressed in the proposed plan, or which (referring to the role of tussock grassland in the retention of water yield) should not be addressed in the plan.</p>
Forest and Bird NZ	706.43	771-21Rural Zone > 890-21.5Rules - Standards	<p>Submitter seeks to add a standard for Forestry and shelter belts to provide for:</p> <ul style="list-style-type: none"> • Shall not be established within 20m of water bodies or where trees could fall within a 20m buffer • Forestry is to avoid being located in ONF and ONL. • Forestry or shelter belts shall not be established where there is significant indigenous vegetation • Forestry and shelter belts will avoid planting trees that have a potential to naturalise and spread. 	Oppose	<p>The submitter's concerns are either largely addressed through other provisions or (in relation to a 20m buffer for forestry) are motivated by concerns we believe are more relevantly addressed by Otago Regional Council.</p>
Forest and Bird NZ	706.85	26-33 Indigenous Vegetation and	Amend the proposed Objective.	Oppose	<p>The proposed wording already addresses the submitter's concerns while providing for reasonable land use in the rural areas.</p>

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		Biodiversity > 28-33.2 Objectives and Policies > 43-33.2.3 Objective 3			
Forest and Bird NZ	706.87	26-33 Indigenous Vegetation and Biodiversity > 28-33.2 Objectives and Policies > 43-33.2.3 Objective 3 > 44-33.2.3.1	Amend the proposed Objective.	Oppose	The proposed wording already addresses the submitter's concerns while providing for reasonable land use in the rural areas.
Forest and Bird NZ	706.92	26-33 Indigenous Vegetation and Biodiversity > 28-33.2 Objectives and Policies > 43-33.2.3 Objective 3 > 49-33.2.3.6	Submitter seeks the policy be adapted to incorporate: <i>'Ensure indigenous vegetation removal does not adversely affect the natural character of the margins of water ways'</i>	Oppose	The proposed provisions relating to indigenous vegetation removal are already sufficient. There does not need to be any further broadening of the policies relating to address indigenous vegetation removal around waterways, and such a broad policy would unnecessarily restrict reasonable land use and farm management.
Forest and	706.95	26-33	Submitter seeks the objective is	Oppose	Protection of these values within the alpine

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Bird NZ		Indigenous Vegetation and Biodiversity > 28-33.2 Objectives and Policies > 51-33.2.4 Objective 4 > 52-33.2.4.1	amended as follows: Recognise that alpine environments contribute to the distinct indigenous biodiversity and landscape qualities of the District and are vulnerable to <u>should be protected from</u> change through vegetation clearance or establishment of exotic plants.		environment requires active management. The requirement 'to protect' puts a very high regulatory bar in place, and unnecessarily restricts otherwise legitimate and reasonable land use in the alpine environment.
Forest and Bird NZ	706.10 5	26-33 Indigenous Vegetation and Biodiversity > 54-33.3 Other Provisions and Rules > 72-33.3.4 Exemptions > 73-33.3.4.1	Submitter seeks that the proposed exemption provided to any area identified in the District Plan maps and scheduled as a Significant Natural Area that is, or becomes protected by a covenant under the Queen Elizabeth II National Trust Act, should be removed.	Oppose	The proposed exemptions reflect the fact that there are alternative methods of achieving the protection and active management of Indigenous Vegetation and Biodiversity. The proposed exemption recognises that, as these alternative methods are essentially achieving the same ultimate goal, there is no need for the District Plan to also regulate these areas. Removing the exemption would act as a serious disincentive to those landowners considering voluntary protection of Indigenous Vegetation and Biodiversity.
Forest and Bird NZ	706.10 6	26-33 Indigenous Vegetation and Biodiversity > 54-33.3 Other	Submitter seeks the exemption for the clearance of drains is removed.	Oppose	The clearance of drains is a fundamental necessity for rural production, and should remain as an exemption. In terms of water quality (sedimentation), the submitters concerns are addressed through Otago Regional Council's water plan 6A.

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		Provisions and Rules > 72-33.3.4 Exemptions > 74-33.3.4.2			
Otago Fish and Game Council	788.1	26-33 Indigenous Vegetation and Biodiversity > 28-33.2 Objectives and Policies > 39-33.2.2 Objective 2	Submitter seeks an addition to Objective 33.2.2; <i>"33.2.2.3 - Avoid the clearance or alteration of tussock grassland where it will have adverse effect on water yield values in dry catchments".</i>	Oppose	<p>Research into the benefits of tussock grassland in respect to retention of water indicates these benefits will be catchment dependent; subsequently the protection afforded tussock grasslands will also largely be catchment dependent.</p> <p>This policy also requires some landowners to give up productive potential for the good of other landowners, without a value transfer mechanism to address equity issues, and no measure of efficiency or accounting between services lost and services gain to ensure a net benefit.</p> <p>Federated Farmers would support a non-regulatory, catchment based approach to this issue. We consider the responsibility for this approach should sit with Otago Regional Council.</p>
Otago Regional Council	798.7	771-21Rural Zone > 853-21.4Rules - Activities	The submitter highlights proposed provisions which may result in overlap with regional rules, and underlines that this may be confusing and increase the cost to applicants if consents are needed under both the regional and district plans.	Support	We agree with the submitter's request that discussion occurs to define respective roles in these areas of duplication, and that an advice note is added to any remaining rules in areas of statutory overlap to inform plan users of the need to consult the relevant Regional Plan.

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Transpower	805.53	771-21Rural Zone > 772-21.1Zone Purpose	The submitter proposes an addition to the zone purpose; <i>It is also important to recognise that infrastructure is an established rural activity and has a functional, locational and operational need to be located in the rural area. It is important that such infrastructure is enabled to be operated, maintained, upgraded and developed safely, effectively and efficiently.</i>	Oppose	The submitter seeks the same addition throughout the zone based chapters. This weakens the intent of the introduction to these chapters, particularly in the rural area where the 'functional, locational and operational' needs outlined are significantly less. The submitter's concerns are better addressed through an amended reference within the Energy and Utilities Chapter.
Transpower	805.56	771-21Rural Zone > 773-21.2Objectives and Policies > 789-21.2.4 Objective - 4	The submitter seeks an amendment to the objective to, among other matters, broaden the scope to include protecting regionally significant infrastructure from adverse effects, including reverse sensitivity effects.	Oppose in part	The submitter's additions detract from a focus on managing these concerns in relation to rural production. The submitter's concerns are better addressed through the Energy and Utilities Chapter.
Transpower	805.69	26-30 Energy and Utilities > 27- 30.1 Purpose	Submitter seeks amendments to include the 'operation, maintenance and upgrading' of the transmission of electricity.	Oppose in part	Upgrading of the generation and transmission of electricity may adversely impact other reasonable and beneficial land use activities. Subsequently the upgrading of the generation or transmission of infrastructure should not be unnecessarily elevated, to provide for a balanced consideration of the impacts of an upgrade.
Transpower	805.77	26-30 Energy and Utilities > 30-	Submitter seeks the addition of a new Objective, and to replace Policy 30.2.6.4 with the following objective	Oppose in part	We consider the proposed new objective and policy would unnecessarily and unreasonably elevate the status of electricity transmission, in

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		30.2 Objectives and Policies > 59-30.2.6 Objective 6 > 63-30.2.6.4	<p>and policy:</p> <p><i>New objective:</i></p> <p><i>To avoid the establishment of new land use activities that could adversely affect (including through reverse sensitivity) the safe, efficient or effective operation, maintenance, upgrading and development of the National Grid.</i></p> <p><i>New policy:</i></p> <p><i>To manage the effects of subdivision, development and land use on the safe, effective and efficient operation, maintenance, upgrading and development of the National Grid by ensuring that:</i></p> <p><i>a. Areas are identified in the Plan to establish safe buffer distances for managing subdivision and land use development near the National Grid;</i></p> <p><i>b. Sensitive activities and large-scale structures are excluded from establishing within National Grid Yards and are appropriately managed around substations;</i></p> <p><i>c. Subdivision is managed around the National Grid to avoid subsequent land use from restricting the operation, maintenance, upgrading and development of the National Grid; and</i></p> <p><i>d. Changes to existing activities within</i></p>		<p>comparison to other reasonable and beneficial land uses.</p> <p>This is particularly the case in respect to upgrading of transmission infrastructure.</p> <p>We consider the submitter's concerns are already largely addressed through provisions relating to transmission infrastructure (particularly the National Grid) proposed in the PDP.</p>

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			<i>a National Grid Yard and around National Grid substations do not further restrict the operation, maintenance, upgrading and development of the National Grid.</i>		
Transpower	805.78	26-30 Energy and Utilities > 30- 30.2 Objectives and Policies > 59-30.2.6 Objective 6 > 64- 30.2.6.5	Submitter seeks amendments to the Objective, to Recognise and provide for existing and future network utilities.	Oppose	It is unreasonable to require the District's planning concerns to address future potential development, particularly if this restricts other reasonable and beneficial land use.
Transpower	805.79	26-30 Energy and Utilities > 30-30.2 Objectives and Policies > 59-30.2.6 Objective 6	Add new Objective: <i>To recognise and provide for the ongoing operation, maintenance, development and upgrading of the National Grid.</i>	Oppose	It is unreasonable to provide for the development and upgrading of the National Grid; this goes beyond what is required under the NPSET and may impact other reasonable and beneficial land use.
Transpower	805.91	26-30 Energy and Utilities > 120-30.5 Rules – Standards	Replace Rule 30.5.10 with a proposed new non-complying Rule.	Oppose in part	The submitter's concerns are addressed through proposed Rule 30.5.10.
Transpower	805.93	26-30 Energy and Utilities > 120- 30.5	Replace Rule 30.5.11 with a proposed new non-complying Rule.	Oppose in part	The submitter's concerns are addressed through proposed Rule 30.5.11. The proposed amendments to the rule place tighter

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		Rules – Standards > 158-30.5.11			restrictions on reasonable activities in proximity to the National Grid.
Transpower	805.95	26-30 Energy and Utilities > 120- 30.5 Rules – Standards	Add a new rule 30.5.15 to provide that <i>Subdivision of land in any zone within the National Grid Subdivision Corridor is a restricted discretionary activity if it complies with the following standard...</i> ...with the standards listed subsequently.	Oppose in part	Subdivision may be undertaken for a number of reasons, beyond the intention to build upon the subdivided property. Requiring rules solely based on subdivision is an unreasonable expectation. Further, the proposed controls on the nature and location of any vegetation planted are onerous given the existing and clearly delineated responsibilities for control under the Electricity (Hazards from Trees) Regulations.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga collectively Manawhenua	810.7	57-3Strategic Direction > 59-3.2Goals, Objectives and Policies > 109-3.2.5 Goal 5	Add a new objective and policy to this goal: <i>Objective: Protect wahi tupuna from subdivision, use and development.</i> <i>Policy: Identify the district's wahi tupuna on the District Plan maps, and protect them from the adverse effects of subdivision and development.</i>	Oppose	The proposal to 'protect' wahi tupuna from subdivision, use and development is an onerous obligation, particularly when the submitter's concerns can be addressed while also providing for compatible subdivision, use or development where this does not adversely impact wahi tupuna.