



FEDERATED FARMERS

SUBMISSION ON:
Proposed Change 2 to Regional Policy Statement

SUBMISSION

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TO: Environment Waikato Regional Council
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SUBMISSION ON: Proposed Change 2 to Regional Policy Statement (Future Proof)

FROM: Waikato Federated Farmers

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Waikato Federated Farmers wishes to be heard in support of this submission.

Waikato Federated Farmers appreciates this opportunity to submit on proposed Change 2 to the Regional Policy Statement to implement the Future Proof Growth Strategy.

GENERAL COMMENTS

Waikato Federated Farmers considers that more clarity is required with regards to the policies. The Proposed policies seem to often contradict each other as to where rural residential development is to be encouraged or discouraged.

Proposed Change 2 often directs to cluster rural residential development around existing settlements and towns. This principle has been upheld in the Future Proof document as a way of minimising loss of productive soils to residential uses. This method of clustering may not achieve that aim as many towns and settlements have historically been located on prime soils, and clustering development around these areas will exacerbate the problem. An example of this would be Class 1 soils between Cambridge and Hamilton.

Waikato Federated Farmers considers that rural character and perceived rural amenity are in many cases as a direct result of the productive nature of the rural landscape and are continuously changing as rural practices change. All farming activities have the potential to change the landscape, so to seek protection of the existing rural amenity is to freeze a point in time and halt any further changes in farming and pastoral activity. Proposed Change 2 needs to provide territorial authorities with direction to consider rural landscapes as having economic importance and considering all the four well beings when discussing development and growth.

OBJECTIVE

Waikato Federated Farmers supports the Objective, in that positive social, cultural, economic and environmental outcomes will be created during development and land use. It is important to uphold Section 5 and the Purpose of the Resource Management Act in that people are enabled to provide for their economic, social and cultural wellbeing, while reducing effects on the natural environment.

POLICY 1:

GOVERNANCE COLLABORATION

Waikato Federated Farmers appreciates the desire of territorial authorities and the regional council to carry out holistic and integrated management of the resources in the Future Proof sub-region, we are concerned about unnecessary overlap and added cost without added value of some council activities.

Proposed Change 2 should provide clear direction as to functions that the territorial authorities and the regional council will respectively carry out. There has been some confusion over functions and powers that contribute to achieving an objective. Territorial authorities seem to be moving towards controlling activities outside their functions with regards to soil structure and fertility and water quality.

Proposed Change 2 should also promote working with the rural sector and taking their views into account. Encouraging a collaborative approach with landowners will advance landowner buy-in and participation in regional land and soil management, and will more likely result in achieving objectives. Implementation Method 2 outlines that consultation will occur between authorities within the Future Proof sub-region and tangata whenua and the NZ Transport Agency. Taking the views of stakeholders into account is a part of governance collaboration.

Relief Sought:

- That a new policy be identified that reads:
The Waikato Regional Council, Hamilton City Council, Waipa District Council and Waikato District Council will collaborate within their functions as outlined by Sections 30 and 31 of the Resource Management Act to achieve outcomes. Or words to this effect.
- That a new implementation method be identified that reads:
Consultation shall occur between Waikato Regional Council, Hamilton City Council, Waipa District Council and Waikato District Council, tangata whenua, the New Zealand Transport Agency and stakeholders with the Future Proof sub-region with respect to major initiatives that could affect the interests of these parties. Or words to this effect.

POLICY 2:

ADOPTION OF LONG TERM LAND USE PATTERN

Waikato Federated Farmers considers that the adoption of a long term land use pattern is appropriate, provided that this does not limit the flexibility of farming activities being carried out and a loss of primary production opportunities. Existing farming activities need to be protected from new activities.

POLICY 4:

DEVELOPMENT PRINCIPLES

Waikato Federated Farmers considers that Proposed Change 2 needs to guide district plans to retain flexibility so that development can be assessed on a case-by-case basis. Development opportunities which contribute to farm succession and the social and economic well being of the communities of the sub-region need to be maintained.

More clarity is required for the overall directions of the policies of Proposed Change 2. There seems to be inconsistency between development principles. For example, Policy 4v) directs that new rural residential development should be located adjacent to existing towns or existing rural residential areas. But then Policy 4x) directs that rural residential development should not conflict with urban expansion, which seems to direct rural residential development away from existing towns that may want to expand.

Policy 4c)

Waikato Federated Farmers considers that it is not councils' role to determine what is or is not high quality productive land, but rather to retain flexible land use that is able to respond to new technology and markets. For example, soils that may be perceived as poor for agricultural use by policy planners and therefore suitable for residential development may be used for permanent crops like grape vines or Manuka for honey production. Proposed Change 2 should direct territorial authorities to retain flexibility to take into account the different uses to which different soils can be used for, and not explicitly define which soils are "good soils."

Relief Sought:

- That Policy 4c) is amended to read:
*Development is directed away from identified strategic mineral resources, hazard areas and open high quality productive land **taking into account different uses to which different soils can be used for and assessing productive land on a case-by-case basis.*** Or words to this effect.

Policy 4f)

Federated Farmers considers that Policy 4 f) can be improved by limiting considerations to identified landforms and sites, and also using terminology from the Resource Management Act in assessment of adverse effects.

Limiting the considerations to identified landforms and sites means that the selection of such landforms and sites goes through a robust consultation process and selection criteria are applied.

Rather than using the word protection, using terminology of avoid, remedy or mitigate adverse effects is consistent with Section 17 of the RMA.

Relief Sought:

- That Policy 4f) is amended to read:
Adverse effects on identified significant natural environments, landscapes and heritage sites, including waahi tapu and waahi whakahirahira (sites of significance) are protected are avoided, remedied or mitigated. Or words to this effect.

Policy 4g)

Federated Farmers supports Policy 4g) in that development that enhances biodiversity is encouraged. This provides positive reinforcement for good actions, rather than focussing on the negative.

Policy 4j)

Federated Farmers supports Policy 4j) in that development should not cause reverse sensitivity issues. New activities should be required to internalise their effects from proximity to an existing activity that is appropriate for the rural zone. The activity which is appropriate for the rural zone is the primary activity to be protected from reverse sensitivity, despite changes in character consistent with farming. An example is an existing wedding venue established by resource consent in the rural zone being able to complain about new farming if the neighbouring farm operation changes from sheep to dairy cattle. Although the farming activity is changing, it is this activity which is appropriate for the rural zone and should be protected from reverse sensitivity.

Relief Sought:

- That Policy 4j) is amended to read:
*Development does not cause reverse sensitivity effects such as with respect to existing industry, existing rural activities and existing or planned infrastructure **that are appropriate for the zoning.*** Or words to this effect.

Policy 4q)

Waikato Federated Farmers considers that the focus needs to be on avoiding, remedying or mitigating adverse effects, rather than on protection and restoration of the Waikato River. The terms avoid remedy or mitigate allow developers the flexibility to employ a range of measures, and is also consistent with Section 17 of the RMA. To require all development to protect and restore the river will not be achievable.

Relief Sought:

- That Policy 4q) is amended to read:
*Development ~~protects~~ **avoids, remedies or mitigates adverse effects on the health and wellbeing of the Waikato River and its catchments and helps to restore maintain the health and wellbeing of the Waikato River where possible.** Or words to this effect.*

Policy 4w)

Waikato Federated Farmers considers that Policy 4w) should focus on avoidance, remediation or mitigation of adverse visual effects. Currently the policy limits measures to topography or tree planting, when the terms avoid remedy or mitigate allow developers the flexibility to employ a range of measures, and is also consistent with Section 17 of the RMA.

Relief Sought:

- That Policy 4w) is amended to read:
*New rural residential development should be concentrated in clusters of limited extent, with adverse visual effect **avoided, remedied or mitigated minimised by a combination of topography and tree planting, but with some allowance for open low density rural residential development where visual effects are avoided, remedied or mitigated minimised.** Or words to this effect.*

Policy 4z)

Proposed Change 2 needs to direct amenity values to natural areas rather than to farmed landscapes, and to balance amenity values with normal farming activities. The Regional Policy Statement needs to direct councils to consider economic well-being of landowners and their right to earn an income from their land which will also contribute to the regional economic well-being when considering matters of amenity.
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Federated Farmers supports specific, detailed landscape assessments that attempt to define landscape categories. However, our members have expressed a degree of concern, particularly in relation to the inclusion of what they see as a new tier of landscape management that sits slightly below “outstanding” but is given a status by defining it as having district significance.

The rural landscape provides income for families, as well as providing food for local, national and international populations. We are concerned that amenity values and idealism of a bucolic landscape will take precedence over other values. Proposed Change 2 should provide direction to recognise that rural landscapes are working landscapes, and to focus efforts on natural native vegetated landscapes instead. Waikato Federated Farmers is opposed to controls imposed on the farming community to maintain the status quo based primarily on the urban perception of how a rural landscape should look.

Relief Sought:

- That Policy 4z) be amended to provide direction to recognise that rural landscapes are working landscapes when considering amenity issues, and not to limit the scope of farming activities that can be carried out.

Policy 4 Implementation Methods

Waikato Federated Farmers consider that a 4th Implementation Method be identified to achieve Policy 4. Some policies focus on encouragement of certain development principles. A new method to encourage uptake of design principles should be that the partner councils provide incentives which will have the effect of encouraging uptake of development principles.

Relief Sought:

- That a new implementation method for Policy 4 be identified that reads:
Waikato Regional Council, Hamilton City Council, Waipa District Council and Waikato District Council will provide incentives to encourage the uptake of design principles through regional and district plans, and Long Term Council Community Plans. Or words to this effect.

POLICY 5:

PLANNING FOR URBAN DEVELOPMENT

Waikato Federated Farmers considers that Proposed Change 2 should provide more direction for territorial authorities to strongly encourage low impact design during urban development. Urban development can make greater use for municipal stormwater designs that reduce adverse effects on the environment, and rainwater collection for use which will reduce demand on a limited resource. Rainwater can be collected by urban properties for use in the garden and laundry or bathroom use. All land uses in all zones should be encouraged to reduce their effects on the quality and quantity of fresh water and rivers.

Relief Sought:

- That Policy 5 is amended to require territorial authorities to strongly encourage low impact stormwater and wastewater design, and rainwater collection for urban development.

POLICY 6:

PLANNING FOR RURAL RESIDENTIAL DEVELOPMENT

More clarity is required as to the direction of policies in section 6. Policy 6e) directs that provision should be made for identified towns to expand beyond urban limits, but then Policy 6g) seems to contradict this by directing that further fragmentation of land in the vicinity of these towns is strictly limited. Is development around these towns encouraged or discouraged?

Policy 6c)

Waikato Federated Farmers considers that it is not councils' role to determine what is or is not a versatile soil, but rather to retain flexible land use that is able to respond to new technology and markets. For example, soils that may be perceived as poor for agricultural use by policy planners and therefore suitable for residential development may be used for permanent crops like grape vines or Manuka for honey production. Proposed Change 2 should retain flexibility to take into account the different uses to which different soils can be used for, and not explicitly define which soils are "good soils."

Relief Sought:

- That Policy 6c) is amended to read:
*Protect the productive capacity of versatile soils in the sub-region, **taking into account different uses to which different soils can be used for and assessing soils on a case-by-case basis.*** Or words to this effect.

POLICY 7:

CO-ORDINATING GROWTH AND INFRASTRUCTURE

Waikato Federated Farmers supports co-ordination between infrastructure and urban development. This will reduce adverse effects such as wastewater system overloading and subsequent spillages in waterways. The Proposed Plan Change needs stronger guidance for territorial authorities to strongly encourage low impact design for servicing. Urban development can make greater use for municipal stormwater designs that reduce adverse effects on the environment, and rainwater collection for use which will reduce demand on a limited resource. Rainwater can be collected by urban properties for use in the garden and laundry or bathroom use. All land uses in all zones should be encouraged to reduce their effects on the quality and quantity of fresh water and rivers, such a holistic approach will increase equity between resource users and is more likely to achieve positive results.

Relief Sought:

- That Policy 7 is amended to require territorial authorities to strongly encourage low impact stormwater and wastewater design, and rainwater collection for urban as well as rural residential development.

POLICY 8:

MONITORING EFFECTIVENESS

Waikato Federated Farmers considers that monitoring effectiveness is appropriate. The more information that is collected by councils, the more effective we can be at making good enduring and successful decisions regarding growth in the Future Proof sub-region.

ABOUT FEDERATED FARMERS OF NZ

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.

These comments are representative of member views and reflect the fact that resource management and local government decisions impact on our member's daily lives as farmers, members of the local community, landowners and ratepayers.

Waikato Federated Farmers thanks Environment Waikato for considering our submission to Proposed Change 2 to the Regional Policy Statement.

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North Island Regional Policy Manager