



FEDERATED FARMERS

SUBMISSION ON:

Plan Change 24 & Variation 25 to the Taupo District
Plan Landscape and Natural Values

SUBMISSION

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TO: Taupo District Council Hearing Committee

SUBMISSION ON: Plan Change 24 & Variation 25 to the Taupo District Plan
Landscape and Natural Values

FROM: Rotorua/Taupo Federated Farmers

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INTRODUCTION

The Rotorua/Taupo Province of Federated Farmers appreciates this opportunity to present our submission to Plan Change 24 and Variation 25 to the Taupo District Plan. We acknowledge any submissions by individual members.

My name is Rhea Dasent, and I am a Regional Policy Advisor for Federated Farmers. I provide policy advice for the Rotorua/Taupo Province of Federated Farmers. With me today is Jocelyn Reeve, a sheep and beef farmer who has lived in the District since 1976. Jocelyn is a member of the Rotorua/Taupo Province of Federated Farmers, and is also involved in the Provincial Committee.

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 submission we present today reflects the fact that local government decisions impact on our member's daily lives as farmers, members of the local community, landowners and ratepayers.

1. GENERAL COMMENTS TO PLAN CHANGE 24 TO THE TAUPO DISTRICT PLAN

Rotorua/Taupo Federated Farmers considers that a site by site assessment should be carried out by the Council within 5 years, which includes an ecologist's report at the Council's expense, evaluating the values of the sites and providing information to help landowners manage the site. This process should also assist the Council in ground-truthing the schedule of sites. This would also be a good opportunity to engage with landowners with a view to developing Values Management Agreements based on their site's ecological assessment.

The planning report acknowledges the importance of monitoring sites. The planning report recommends that as a result of other submissions, a new method

has been included to provide for the review of the effectiveness of the methods five years after the rules become operative. Methods 3i.3.xiv and 3i.3.xv have been inserted into the Plan Change. Federated Farmers supports these two new Methods.

Relief Sought:

- **That provision is made for a review of the sites listed under this Plan Change to be completed within 5 years of the Plan being notified.**

2. SECTION 3H.1 - INTRODUCTION

Rotorua/Taupo Federated Farmers opposes the protection of rural 'working' landscapes for amenity purposes. This fails to recognise that working landscapes are subject to human activity and change, they are not static landscapes that should be kept in perpetuity. The rural landscape has been shaped by agricultural activities over several generations, and will continue to be so. Land use decisions such as planting or harvesting timber forests, seasonal cropping, change of use to pasture or into permanent crops, and subdivision can provide different amenity values. Rotorua/Taupo Federated Farmers does not support initiatives to protect and enhance rural amenity values at the expense of farming activities.

Subdivision rules and rural zones are in place to help ensure that the rural landscape remains rural in character. It is unnecessary to place additional restrictions on rural sites for amenity purposes. Rotorua/Taupo Federated Farmers therefore

recommends that Amenity Landscape Area classifications be removed from sites that are rural working landscapes, as the rural zoning is sufficient to protect rural amenity and character.

The planning report recommends that our submission to Section 3h.1 is not accepted. The reason given is that approach to the landscape areas is for protection from inappropriate activities, and seeks to ensure certain activities are carried out in a way that maintains and enhances landscape amenity. Federated Farmers is concerned that farming activities will be deemed inappropriate, even though these very activities contributed to the amenity of the landscape.

Relief Sought:

- **That the Amenity Landscape Area classification be removed from rural zones.**

3. SECTION 3H.2.1 - EXPLANATION

Rotorua/Taupo Federated Farmers supports the limitation of the rules in Plan Change 24 to new activities only. This recognises the current zoning the Outstanding Landscape Areas are located within, and allows existing activities to continue.

The planning report recommends that the submission be accepted and that no changes are

made. Federated Farmers supports the planning report recommendation.

Relief Sought:

- **That the rules in Plan Change 24 continue to apply the rules to new activities only, and not current activities.**

4. POLICY 3H.2.4.ii

Rotorua/Taupo Federated Farmers supports Policy 3h.2.4.ii which states that the Council will recognise existing efforts of landowners to manage Landscape Areas in the Taupo District.

It is important to recognise the voluntary efforts of landowners. Many Rotorua/Taupo Federated Farmers members have provided protection to areas of their land through QEII Covenants, of which our President is one. Landowners are more likely to work proactively when protecting landscape areas when they have a positive acknowledgement from Council and a sense of partnership. We note that where existing voluntary protection methods are in place they are exempt from some rules, Federated Farmers supports council actions to incentivise voluntary landowner initiatives.

We submitted that there was not a related method for this policy. Council can acknowledge landowners voluntary efforts to contribute to landscape protection by providing economic incentives and rewards. Incentives could take the form of appropriate rates relief for the area protected; providing reimbursements or discounts for products and fencing material; resource consent fee discounts; provision of native plants seedlings; and animal pest and weed control assistance.

The planning report recommends to insert the following text into Section 3h.3 Explanation:

“The placement of resource consent conditions should take into consideration new and existing efforts by landowners or applications to appropriately manage the values associated with the affected Landscape Area”.

Although we acknowledge the addition of this text providing guidance during the formation of resource consent conditions, Rotorua/Taupo Federated Farmers believes that an explicate method is required to reinforce Policy 3h.2.4.ii. Without supporting methods, Policy 3h.2.4.ii and Anticipated Environmental Outcome 3h.4.v will not be achieved.

We note that Section 3i.3 Methods includes economic incentives to encourage landowners to undertake voluntary protection of Significant Natural Areas. These methods can easily be applied to the Landscape Areas section, and as such we have recommended that similar text be used. The District Plan can provide reference to Councils intent to provide incentives under other documents such as the Annual Plan or LTCCP.

Relief Sought:

- **That Policy 3h.2.4.ii is retained within Plan Change 24.**
- **That new methods be included in 3h.3 that read:**
 - ***“Provision of incentives for landowners to encourage appropriate voluntary protection of Landscape Areas such as financial assistance with fencing and pest control, and/or assistance with applications for protection covenants.”***
 - ***“Assistance to landowners to apply to national and regional government for funding for the appropriate protection and enhancement of Landscape Areas in the Taupo District.”***
 - ***“Allocation of resources through the LTCCP and Annual Plan processes such as funds to assist appropriate voluntary protection and enhancement of Landscape Areas.”***

5. METHOD 3H.3.vii

Rotorua/Taupo Federated Farmers opposes the deletion of Method 3h.3.vii which detailed that information be provided to landowners through the Land Information Memorandum process. Information regarding identified sites should be included on LIMs so that prospective landowners are aware of the sites and what is expected for their maintenance.

The planning report accepts the submission, but does not recommend to re-insert Method 3h.3.vii. Federated Farmers wonders why less information to landowners who have applied for a LIM would be better than well informed landowners.

The Plan Change Text as a Result of Submissions has Method 3h.3.vii which states *“Education and the provision of information about the value of the landscape to the District’s character and the need for developers and landowners to have particular regard to landscape values during the planning stage of a subdivision, use or development.”* Provision of

information as required by this new Method could only mean information on the planning maps, and seeing as no specific mention of Land Information Memoranda is made, the information might not make it onto LIMs. People obtain LIMs with the expectation that all information about a property will be provided, and including information about Landscape in a LIM would be a simple way of increasing information pathways.

Relief Sought:

- **That Method 3h.3.vii be reinserted as reads:**
“Issuing of information through the Land Information Memorandum process under the Local Government Act 1974 to inform landowners or developers of allotment’s location with an Outstanding Landscape Management Area or Landscape Amenity Management Area.”

6. SECTION 3i.1.1 - CRITERIA FOR SIGNIFICANT NATURAL AREA IDENTIFICATION

Rotorua/Taupo Federated Farmers supports the use of criteria for robust assessment of the significance of natural areas. However for a site to be deemed significant, all criteria should be applied equally and met, rather than a site being identified as significant by meeting just one or two of the criteria. Rotorua/Taupo Federated Farmers therefore submitted that provision be made for identified sites to meet all or the majority of the criteria before being deemed a Significant Natural Area and listed in the schedule.

The planning report states that it is not appropriate for criteria to be applied as a sliding scale. The reason for this is that not all criteria will relate to every site in every given circumstance. The planning report recommended that the criterion should be removed from the Plan to be included in the supporting Section 32 Report instead. The reason for this is that any additional sites will have to go through a plan change process in order to be included in the Schedule of Sites, and that no plan changes are anticipated in the foreseeable future.

Federated Farmers disagrees with this reasoning. The inclusion of the criteria only in a Section 32 Report has no legal effect. To have criteria only in the

Section 32 Report runs the risk of uncertainty, criteria could change with each new Section 32 Report as there would be no requirement to use the criteria set in the District Plan.

Federated Farmers did not seek for the criteria to be removed completely from the Plan, but rather to be amended to provide more clarity over the use of the criteria. Neither did any other submitters seek for the entire criteria to be removed from the Plan.

Relief Sought:

- **That the Section 3i.1.1 *Criteria for Significant Natural Area Identification* be reinstated within the Plan.**
- **That provision be made in Section 3i.1.1 *Criteria for Significant Natural Area Identification* for identified sites to meet all or the majority of the criteria before being listed in the schedule.**

7. CRITERION 3i.1.1.6b

Rotorua/Taupo Federated Farmers opposes Criterion 3i.1.1.6b because the criteria of exclusion are not explicit enough. All created wetlands should be excluded from criteria for Significant Natural Area identification unless they meet the criteria in Whaley et al.

The potential inclusion of created wetlands as Significant Natural Areas may discourage landowners from creating such wetlands, resulting in perverse environmental outcomes. The criteria in Whaley et al. will ensure that those created wetlands which are significant enough to meet the criteria will still be protected.

Relief Sought:

- **That Criteria 3i.1.1.6.b be amended to read:**
“Indigenous fauna communities that have been created and subsequently maintained unless in those instances they meet the criteria in Whaley et al.” or wording to this effect.
- **That provision be made in Section 3i.1.1 *Criteria for Significant Natural Area Identification* for identified sites to meet all or the majority of the criteria before being listed in the schedule.**

8. CRITERION 3i.1.1.7

Rotorua/Taupo Federated Farmers opposes Criterion 3i.1.1.7 because the protection of a site simply because it is larger than other sites is inappropriate. The size of the site may be appropriate for comparing potential sites that meet other similar criteria, but size should not be a criterion for identification on its own. Once again, Rotorua/Taupo Federated Farmers is not disputing the appropriateness of the size criterion, but rather that it should not be a stand-alone criterion that identifies sites as a Significant Natural Area without meeting other criteria.

The planning report recommends that the criterion set remains, and notes that large sites are more likely to have a comprehensive and self-sustaining

ecosystem and be of more value than smaller sites. It seems that the planning report agrees with Federated Farmers in that more than one criteria is needed to determine that a large site is significant or not.

Relief Sought:

- **That provision be made in Section 3i.1.1 *Criteria for Significant Natural Area Identification for identified sites to meet all or the majority of the criteria before being listed in the schedule.***

9. CRITERION 3I.1.1.11

Rotorua/Taupo Federated Farmers opposes Criterion 3i.1.1.11 because the protection of a site simply because it acts as a buffer zone for other sites is inappropriate. The location of the site may be appropriate for comparing potential sites that meet other similar criteria, but location next to another site should not be a criterion for identification on its own. Once again, Rotorua/Taupo Federated Farmers is not disputing the appropriateness of the location criterion, but rather that it should not be a stand-alone criterion that identifies sites as a Significant Natural Area without meeting other criteria.

The purpose of the Plan Change is to impose rules to protect identified sites from adverse effects; there is no need to protect additional sites because they carry out the same function as the rules are supposed to. This criterion will potentially impose additional land use restrictions for sites that are not significant.

The planning report recommends that the criterion set remains, and notes that sites that provide a buffering function are important in the manner in which they relate to the vegetation that they adjoin, and that buffering sites will be considered for protection if they consist of indigenous vegetation rather than of pasture or exotic species. It seems that the planning report agrees with Rotorua/Taupo Federated Farmers in that more than one criteria is needed to determine that a large site is significant or not.

Relief Sought:

- **That provision be made in Section 3i.1.1 *Criteria for Significant Natural Area Identification* for identified sites to meet all or the majority of the criteria before being listed in the schedule.**

10. METHODS 3i.3 - ECONOMIC INCENTIVES

Rotorua/Taupo Federated Farmers supports provision for economic incentives to be available to landowners voluntarily protecting and enhancing natural values on their land. Provision for rates postponement such as for Lake Taupo Lakebed and Lakeshore Reserve should be included as an additional incentive.

The planning report recommends that an additional incentive for rates postponement not be added, as the District Plan does not guide Council spending but rather direction should be given for the concept of rates remission through the Biodiversity Strategy.

Federated Farmers notes that Section 3i.3 Methods includes an incentive to allocate resources through the LTCCP and Annual Plan processes. This Method seems to combine the planning report's proviso that Plans shall not allocate spending with Federated Farmers idea of including rates remission as an economic incentive.

Federated Farmers therefore suggests that instead of an additional Method as first was requested, that Method 3i.3.xi be amended to include provision for rates remissions in the LTCCP and Annual Plan processes.

Relief Sought:

- **That an Method 3i.3.xi be amended to read:**
“Allocation of resources through the LTCCP and Annual Plan processes such as funds and rates remissions to assist appropriate voluntary protection and enhancement of Landscape Areas.”

11. METHOD 3i.3.viii

Rotorua/Taupo Federated Farmers supports Method 3i.3.viii in that provision for incentives such as financial assistance with fencing and pest control will be provided. Landowners are more likely to proactively protect and enhance natural values on their private property when they have the ability to obtain public funding for a public good. Financial assistance for pest control is particularly welcomed by Rotorua/Taupo Federated Farmers as this is an ongoing problem associated with protected sites.

The planning report recommended that Method 3i.1.1.viii be retained. Rotorua/Taupo Federated Farmers supports this planning recommendation.

Relief Sought:

- **That Method 3i.1.1.viii is retained.**

12. METHOD 3i.3.ix

Rotorua/Taupo Federated Farmers supports Method 3i.3.ix in that assistance will be provided to landowners to apply for funding for protection and enhancement of natural values. Landowners are more likely to proactively protect and enhance natural values on their private property when they have the ability to obtain public funding for a public good.

The planning report recommended that Method 3i.1.1.ix be retained. Rotorua/Taupo Federated Farmers supports this planning recommendation.

Relief Sought:

- **That Method 3i.1.1.ix is retained.**

13. METHOD 3i.3.x

Rotorua/Taupo Federated Farmers supports Method 3i.3.x in that resources such as funding to assist in voluntary protection be allocated through the LTCCP and Annual Plan processes. Landowners are more likely to proactively protect and enhance natural values on their private property when they have the ability to obtain public funding for a public good.

The planning report recommended that Method 3i.1.1.x be retained. Rotorua/Taupo Federated Farmers supports this planning recommendation.

Relief Sought:

- **That Method 3i.1.1.x is retained.**

14. METHOD 3i.1.1.xi

Rotorua/Taupo Federated Farmers supports Method 3i.3.xi in that. Landowners are more likely to proactively protect and enhance natural values on their private property when they have the ability to obtain public funding for a public good.

The planning report recommended that Method 3i.1.1.xi be retained. Rotorua/Taupo Federated Farmers supports this planning recommendation.

Relief Sought:

- **That Method 3i.1.1.xi is retained.**

15. RURAL ENVIRONMENT RULE 4B.1.7.e

Rotorua/Taupo Federated Farmers opposes in part Rule 4b.1.7.e because mitigation planting may not always be practical. When considering mitigation planting it is important to consider the purpose of the building relative to the practicality of mitigation planting. While mitigation planting may be appropriate and desirable for residential structures, it may not be appropriate for farm buildings, which may limit machinery or livestock access to the building. The purpose of a farm building may be compromised by the requirement of mitigation planting. Farm buildings also contribute often to the rural landscape amenity so should not need to mitigate their existence through planting. People expect to see farm buildings when viewing a rural landscape. A farm building may also be so small as to make the cost of mitigation planting excessive compared to the cost of the building itself, an example of this would be a water pump shed.

The planning report recommends that no changes be made in response to the submission, and that the term “farm building” is too ambiguous and could include large scale buildings like commercial greenhouses.

Rotorua/Taupo Federated Farmers therefore proposes that the reference to “farm building” in our relief sought be further defined to buildings that require clear access for practical use and small implement sheds.

Relief Sought:

- **That Rule 4b.1.7.e is amended to read:**
“Any proposed mitigation planting to assist in integrating structures with the site, and the effectiveness of such mitigation on protecting the Landscape Attributes of the Outstanding Landscape Area. This excludes farm buildings that require clear access for practical use, or small implement sheds” or words to this effect.

16. RURAL ENVIRONMENT RULE 4B.1.7.i

Rotorua/Taupo Federated Farmers supports Rule 4b.1.7.i because the exclusion of the rules for structures provided for in a Values Management Agreement recognises that if there is already an agreement between landowners and council for the erection of a structure, there is no need to also require resource consent.

The planning report recommends that Rule 4b.1.7.i be removed along with all other references to Values Management Agreements as a result of submissions, due to little information provided as to what a Values Management Agreement may be and lack of certainty that could be provided in a Plan. The planning report surmised that a comprehensive treatment of a Values Management Agreement in a Plan would direct the agreement process into a resource consent type process, which would lose the collaborative intent. So references to Values Management Agreements in the Plan were therefore recommended to be removed.

Federated Farmers agrees with the planning report in that the intent of Values Management Agreements is to provide for Council recognition of the landowners'

role in managing the values of these areas, and that the majority of landowners are proud of the values of their property.

The planning report also states that the removal of reference to Values Management Agreements in the Plan means that there will be one less option available for landowners to work with Council. Federated Farmers considers this a shame as Values Management Agreements would be a useful tool for Councils to encourage landowners in their management of the values on their property, and provides for tailor-made management on a case-by-case basis.

Relief Sought:

- **That Rule 4b.1.7.i be retained as reads:**
“Specifically provided for in a Values Management Agreement.”

17. RURAL ENVIRONMENT RULE 4b.1.8.i

Rotorua/Taupo Federated Farmers supports Rule 4b.1.8.i because the exclusion of the rules for earthworks provided for in a Values Management Agreement recognises that if there is already an agreement between landowners and council for earthworks to take place there is no need to also require resource consent.

The planning report recommends that Rule 4b.1.7.i be removed along with all other references to Values Management Agreements as a result of submissions, due to little information provided as to what a Values Management Agreement may be and lack of certainty that could be provided in a Plan. The planning report surmised that a comprehensive treatment of a Values Management Agreement in a Plan would direct the agreement process into a resource consent type process, which would lose the collaborative intent. So references to Values Management Agreements in the Plan were therefore recommended to be removed. Stevenson Group Ltd submitted that mandating behaviour through agreements outside the District Plan is not good practice.

Federated Farmers agrees with the planning report in that the intent of Values Management Agreements is to provide for Council recognition of the landowners' role in managing the values of these areas, and that the majority of landowners are proud of the values of their property.

The planning report also states that the removal of reference to Values Management Agreements in the Plan means that there will be one less option available for landowners to work with Council. Federated Farmers considers this a shame as Values Management Agreements would be a useful tool for Councils to encourage landowners in their management of the values on their property, and provides for tailor-made management on a case-by-case basis.

Relief Sought:

- **That Rule 4b.1.8.i be retained as reads:**
“Earthworks that are carried out as part of a Values Management Agreement.”

18. DISTRICT WIDE RULE 4e.1.12

Rotorua/Taupo Federated Farmers supports Rule 4e.1.12 which provides for the creation of bonus lots below 4 hectares. This rule provides an incentive for landowners to create a lot for protection of natural values in the Rural Environment.

The planning report recommends that no changes be made. Rotorua/Taupo Federated Farmers supports the planning recommendation.

Relief Sought:

- **That Rule 4e.1.12 be retained.**

19. DISTRICT WIDE RULE 4e.6.1.ii

Rotorua/Taupo Federated Farmers opposes Rule 4e.6.1.ii because indigenous vegetation clearance up to 100m² or 1% of the Significant Natural Area is too restrictive for rural production activities. Indigenous vegetation may need to be cleared for maintenance of existing fences or access tracks, Rotorua/Taupo Federated Farmers submits that the maximum indigenous vegetation clearance be increased to 500m² or to 2% of the Significant Natural Area to provide for fence and access track maintenance. Increasing the maximum clearance allowance will provide more flexibility for landowners while still being a small enough area to not have significant adverse effects on the site.

The planning report recommends that Rule 4e.6.1.ii be amended to allow for up to 300m² per allotment or 1% of the Significant Natural Area on the allotment be provided for as a permitted activity. While Federated Farmers appreciates the increase of area we maintain that 300m² is not sufficient for landowners to carry out clearance for fence or access track maintenance.

Relief Sought:

- **That Rule 4e.6.1.ii is amended to read:**
“The clearance is less than or equal to 300m² in area per allotment or 1% of the total area of the identified Significant Natural Area on that allotment, whichever is the lesser, or if the clearance associated with fence or access track maintenance is less than or equal to 500m² in area per allotment or 2% of the total area of the Identified Significant Natural Area on that allotment, whichever is the lesser, provided that this is the maximum total area cleared within the Significant Natural Area after December 19 2008.”

20. DISTRICT WIDE RULE 4e.6.1.iii

Rotorua/Taupo Federated Farmers opposes Rule 4e.6.1.iii because the threshold for permitted vegetation clearance at 20 metres from any waterway is overly restrictive. Federated Farmers submitted that adverse effects of vegetation clearance on water quality could be avoided, remedied, or mitigated to within 5 metres of the waterway.

The planning report recommended that Rule 4e.6.1.iii remains as is, with the clarification in 4e.6.2.xii.b that the purpose for the 20 metre width is to protect ecological corridors. Federated Farmers supports the clarification of the purpose of the Rule.

However Federated Farmers still has concerns that indigenous vegetation for maintenance of existing fences or access tracks may be captured by this rule. An existing track or fence closer than 20 metres to a water body is not going to cause detriment that is more than minor to the ecological corridor along a waterbody.

Relief Sought:

- **That Rule 4e.6.1.iii be amended to read:**
“the vegetation cleared is more than 20 metres from any waterbody, or is associated with fence or access track maintenance”

21. DISTRICT WIDE RULE 4e.6.2.i-viii

Rotorua/Taupo Federated Farmers supports Rule 4e.6.2.i to vii because it recognises that if there is already an agreement or set of conditions for the clearance there is no need to also require resource consent.

Rotorua/Taupo Federated Farmers supports the exclusion of discretionary activity status for indigenous vegetation clearance for areas that are already under formal protection, agreements with council, or regional rules for the same matter.

The planning report recommends that the exceptions be moved to the Permitted Activity Rule 4e.6.1.vi. Federated Farmers supports this recommendation.

Relief Sought:

- **That Permitted Activity Rule 4e.6.1.vi is retained.**

22. DISTRICT WIDE RULE 4e.6.2.j (4e.6.2.xi)

Rotorua/Taupo Federated Farmers opposes Criterion j of Rule 4e.6.2 because an ecologists report as part of assessment criteria may not be appropriate for all circumstances. The costs of obtaining such a report may be disproportionate to the significance of the clearance activity being applied for. Council should not be relying on their district-wide information of sites from privately commissioned ecologist's reports for resource consents.

A site by site assessment should be carried out by the council within 5 years, which includes an ecologist's report at the council's expense, evaluating the values of the site and providing information to help the landowner manage the site. This process should also assist the Council in ground-truthing the schedule of sites.

The planning report recommended that our submission not be accepted and that no changes be made, however as a response to other submissions Criteria a-j have been replaced by *Matters Over Which Council Reserves Discretion for the Purposes of Assessment* i – xiv. As a result of changes made, the reference for the requirement for an ecologists

report in Rule 4e.6.2.j is now numbered as 4e.6.2.xi. The reason given for rejecting our submission was that the requirement for a technical assessment by an expert as part of a resource consent process is common, and that the report is only required for Significant Natural Areas. Consents run the risk of not being approved if there is a dearth of information.

Rotorua/Taupo Federated Farmers does not accept this recommendation. The criterion should be based on the effects the clearance will have on the Significant Natural Area, rather than if an ecologists report has been provided or not. The requirement for an ecologists' report should be determined on a case-by-case basis.

Relief Sought:

- **That Criterion xi for Rule 4e.6.2 be deleted, or amended to read:**

“The effects which the clearance will have on the Significant Natural Area.”

23. SECTION 10: DEFINITION OF INDIGENOUS VEGETATION

Rotorua/Taupo Federated Farmers opposes the definition of Indigenous Vegetation because it does not seem to have any relevance to indigenous vegetation. It seems that either the term being defined or the definition itself is incorrect.

The planning report noted that the definition of indigenous vegetation was indeed incorrect, and shall be amended to read:

“Vegetation that occurs naturally in New Zealand or arrived in New Zealand without human assistance.”

Federated Farmers notes that this is the same definition as used in the Waikato Regional Plan. Federated Farmers supports the planning recommendation.

Relief Sought:

- **That the definition of indigenous vegetation be amended to read:**

“Vegetation that occurs naturally in New Zealand or arrived in New Zealand without human assistance.”

24. SECTION 10: DEFINITION OF INDIGENOUS VEGETATION CLEARANCE

Rotorua/Taupo Federated Farmers supports the exclusions from the definition of indigenous vegetation clearance. Clearance of vegetation that is incidental to plantation forest clearance and clearance to maintain existing roads, tracks and earth dams, should be retained as exceptions to the definition of indigenous vegetation clearance.

Federated Farmers submits that two further exceptions be included in *Exceptions from the Definition of Indigenous Vegetation Clearance*. Clearance for safety reasons, and clearance of non-threatened species particularly weed species, should also be added as exclusions from the definition.

The Hen-and-Chicken fern (*Asplenium bulbiferum*) and Manuka (*Leptospermum scoparium*) are very common species that could be considered weeds in some situations. Tutu (*Coriaria (Coriariaceae)*) is poisonous to livestock.

Relief Sought:

- **That the definition of Indigenous Vegetation Clearance in Section 10 be amended to exclude two further instances as reads:**
 - ***“The clearance is required for safety reasons; or***
 - ***The clearance is of non-threatened species that act as weeds”***

25. VARIATION 25

Rotorua/Taupo Federated Farmers supports the additional wording in the proposed subdivision rules for consistency.

Relief Sought:

- **Retain changes.**

Rotorua/Taupo Federated Farmers thanks the Hearing Committee for considering our spoken submission today. We look forward to seeing the changes in the decision document that will resolve the concerns we have raised.