



Resource Management Act 1991
**Submission on a Publicly Notified Plan Change
 To The Wanganui District Plan**

In accordance with Form 5 – RM (Forms, Fees and Procedure) Regulations 2003



TO: Wanganui District Council, PO Box 637, Wanganui **REUTERS CONSTRUCTION LTD**

Name: (print in full) **6.5 GARDINER HOMES, ATRILL DEVELOPMENTS LTD**

This is a submission on Plan Change No. **40** Closing Date: **30/6/15**

1. (a) ~~I could/could not~~* gain an advantage in trade competition through this submission. (*please delete one).
- (b) **I am/am not*** directly affected by an effect of the subject matter of the submission that adversely affects the environment; and does not relate to trade competition or the effects of trade competition (*please delete one).

2. The specific provisions of the proposed plan change that my submission relates to:

THE FINANCIAL CONTRIBUTION Policy

Use additional pages if required

3. My submission is that (Please state in summary the nature of your submission. Clearly indicate whether you support or oppose the specific provisions or wish to have amendments made. Please give your reasons):

We Oppose the Financial Contribution Policy as the Policy is not TRANSPARENT and dis advantages the DEVELOPER for any DEVELOPMENTS

Use additional pages if required

4. I seek the following decision from the Council (Give clear details stating what amendments you wish to see made to the Plan Change, and your reasons):

A more TRANSPARENT Policy that has certainty of Costs for the DEVELOPMENT including costs of UPGRADES or Compensation for Additional WORK

Use additional pages if required

5. I ~~do/do not~~* wish to be heard in support of this submission (*please delete one).

6. If others make a similar submission I ~~would/would not~~* be prepared to consider presenting a joint case with them at any hearing (*please delete one).

7. Address for service:

**12 CLARKSON AVE, 165A GT NORTH RD, 126 GUYTON ST
 WANGANUI**

Signature: **[Signature]** **Lance B. Reuter**

(Person making submission or person authorised to sign on

Day time phone No: **0274 400777** behalf of person making submission)

Email: **Lance50@extra.co.nz** Date:

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RECEIVED

30 JUN 2010

Submission by Transpower New Zealand Limited on proposed Plan Changes 40 – 45 to the Proposed Wanganui District Plan

30 June 2015

Keeping the energy flowing



TRANSPOWER





Resource Management Act 1991
**Submission on a Publicly Notified Plan Change
 To The Wanganui District Plan**

In accordance with Form 5 – RM (Forms, Fees and Procedure) Regulations 2003



TO: Wanganui District Council, PO Box 637, Wanganui

Name: (print in full) TRANSPOWER

This is a submission on Plan Change No. 40-45 **Closing Date:** 30 June 2015

1. (a) I ~~could~~/could not* gain an advantage in trade competition through this submission. (*please delete one).

(b) I am/am not* directly affected by an effect of the subject matter of the submission that adversely affects the environment; and does not relate to trade competition or the effects of trade competition (*please delete one).

2. The specific provisions of the proposed plan change that my submission relates to:

Please see attached submission

Use additional pages if required

3. My submission is that (Please state in summary the nature of your submission. Clearly indicate whether you support or oppose the specific provisions or wish to have amendments made. Please give your reasons):

Please see attached submission

Use additional pages if required

4. I seek the following decision from the Council (Give clear details stating what amendments you wish to see made to the Plan Change, and your reasons):

Please see attached submission

Use additional pages if required

5. I do/~~do not~~* wish to be heard in support of this submission (*please delete one).

6. If others make a similar submission I ~~would~~/would not* be prepared to consider presenting a joint case with them at any hearing (*please delete one).

7. Address for service:

4- Beca Limited

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Signature:

(Person making submission or person authorised to sign on behalf of person making submission)

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Date:

30-6-15

Submission on proposed Plan Changes 40 – 45 to the Wanganui District Plan

To: Wanganui District Council (Council)

Name of submitter: Transpower New Zealand Limited (Transpower)

Transpower is the state-owned enterprise that plans, builds, maintains, owns and operates New Zealand's high voltage electricity transmission network (the National Grid) that carries electricity across the country. It connects power stations, owned by electricity generating companies, to substations feeding the local networks that distribute electricity to homes and businesses.

The National Grid includes towers, poles, lines, cables, and substations in the jurisdiction of Wanganui District Council. The role of the National Grid is to enable New Zealand to achieve its international and local aspirations¹. The National Grid is critically important infrastructure that is necessary for a reliable, secure, supply of electricity, throughout the country.

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

The specific provisions of the proposal that this submission relates to are:

While the proposed Plan Change provisions are contained in a single document, Transpower's submission is primarily in relation to the following aspects of proposed Plan Changes 40 – 45 to the Wanganui District Plan:

- Chapter 16 – Signage (PPC42)
- Chapter 19 – District Wide Activities (PPC43)
- Chapter 22– Network Utilities (PPC44)
- Chapter 10 – Natural Environment (PPC45)

The specific details of Transpower's submission, and decisions sought in relations to the provisions contained in the chapters above, are contained in the attached table. The relief that Transpower is seeking will give effect to the National Policy Statement on Electricity Transmission 2008 (NPSET).

¹ Transpower's Statement of Corporate Intent for July 2012 to June 2015.

1 Executive Summary

The National Grid is nationally (and regionally) significant infrastructure which is recognised within an RMA context by the National Policy Statement on Electricity Transmission 2008 (NPSET) and the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulation 2009 (NESETA).

The Wanganui District Plan (inclusive of plan changes) is required among other things, to:

- (a) give effect to the provisions of the NPSET; and
- (b) not be in conflict with nor duplicate the provisions of the NESETA.

Transpower acknowledges Council's intent to meet the above obligations and supports the general approach taken. However, Transpower considers some amendments to the proposed Plan Changes are required in order to discharge its statutory responsibilities under the NPSET and NESETA.

This submission outlines necessary amendments to the proposed Plan Changes to meet the above statutory requirements.

2 Background: The National Grid

The National Grid extends from Kaikohe in the North Island to Tiwai Point in the South Island, and in doing so links electricity generators to distribution companies and major industrial users throughout New Zealand. To achieve these linkages, the National Grid comprises some 12,000km of transmission lines and cables and 167 substations across the country. The National Grid also includes a telecommunications network of approximately 300 telecommunication sites, which connects and controls the components (including substations) that make up the National Grid.

The National Grid is nationally significant infrastructure that plays an essential role in maintaining reliability and security of supply of energy and supports New Zealand's national and regional economic growth. It is important to acknowledge that Transpower's role is distinct from electricity generation or retail. Transpower provides the required infrastructure to transport electricity from the point of generation to local lines distribution companies which supply electricity to everyday users. These users may be a considerable distance from the point of generation. As a result, the National Grid traverses District and Regional Council boundaries. A large portion of the electricity generated in the lower South Island is transmitted northwards. In some cases, major users of electricity will directly connect to the National Grid.

Transpower is committed to ensuring that the National Grid continues to meet the needs of its users both in the short and in the long term. It is important that existing National Grid infrastructure is allowed to be operated, maintained, upgraded and developed in an efficient and effective manner in order to ensure that these expectations are met. In order for this to occur it is crucial that development under the lines and around other National Grid infrastructure is appropriately managed to ensure continued access to these assets.

Transpower's 30 year strategy for future development of the National Grid is set out in 'Transmission Tomorrow'. This document outlines the view that there will be an on-going role for the National Grid, and that the lines and substations Transpower owns and operates will be required into the future. As such, it is important that the existing transmission corridors are maintained as far as practicable. Conversely, it is important that where new infrastructure is required, this is recognised and provided for.

The National Grid has operational requirements and engineering constraints that dictate and constrain the way it is operated, maintained, upgraded and developed. Operational requirements are set out in legislation, rules and regulations that govern the National Grid, including the Electricity Act 1992, the Electricity Industry Participation Code, and the Electricity (Hazards from Trees) Regulations 2003.

3 Transpower's Assets in Wanganui

Transpower, as the owner or operator of the National Grid, has a significant interest in Wanganui. This interest includes high voltage transmission lines and associated infrastructure that traverse the District in order to supply electricity to Wanganui and to transmit electricity across the broader Wanganui region (and beyond).

The following National Grid assets are within, or traverse, the Council's jurisdiction:

- Brunswick – Bunnythorpe A (BRK-BPE A) 220kV transmission line on double circuit steel towers;
- Brunswick – Stratford A (BRK-SFD A) 220kV transmission line on double circuit steel towers;
- Brunswick – Stratford B (BRK-SFD B) 220kV transmission line on double circuit steel towers;
- Wanganui – Stratford A (WGN-SFD A) 110kV transmission line on single circuit pi poles;
- Bunnythorpe-Wanganui B (BPE-WGN B) 110kV transmission line on double circuit steel towers;
- Brunswick Substation
- Wanganui Substation

A map showing the location of these National Grid assets in Wanganui is attached.

The transmission line assets within and traversing the Wanganui district are located in the following zones: Rural General, Rural Lifestyle, Rural Production and Residential. Transpower's substation assets are located within the Rural General Zone (D46 and D47). These zones are subject to change through the proposed Plan Changes.

4 Resource Management Act and the National Grid

The national significance of the National Grid is recognised, in an RMA context, by the NPSET² and the NESETA³. These documents apply only to the National Grid, and do not apply to local electricity distribution networks, nor lines owned and operated by generators.

4.1 National Policy Statement on Electricity Transmission 2008

The NPSET was gazetted on 13 March 2008 and confirms the national significance of the National Grid and provides policy direction in relation to:

- Recognising the benefits of National Grid transmission;
- Managing the environment effects of the National Grid;

² <http://www.mfe.govt.nz/publications/rma/nps-electricity-transmission-mar08/nps-electricity-transmission-mar08.html>

³ http://www.legislation.govt.nz/regulation/public/2009/0397/latest/DLM2626036.html?search=qs_act%40bill%40regulation%40deemedreg_electricity+transmission_resel_25_h&p=1

- Managing the adverse effects of third parties on the National Grid; and
- Long term strategic planning for transmission assets.

A key reason for introducing the NPSET in 2008 was to resolve the inconsistencies that resulted from the variable provision for the National Grid in RMA plans and policy statements. This variance was despite the fact that the National Grid is largely the same across the country. In promoting the NPSET, central government accepted the importance and benefits of a nationally consistent approach to decisions on transmission activities. The RMA amendment to Regulation 10 of the Resource Management (Forms, Fees, and Procedure) Regulations 2003⁴, by inserting section 2(i) further acknowledges the importance of the National Grid by requiring Transpower to be served notice of applications or reviews that may affect the National Grid.

The single objective of the NPSET is as follows:

“To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:

- *Managing the adverse environmental effects of the network; and*
- *Managing the adverse effects of other activities on the network. “*

The NPSET objective is supported by 14 Policies. In a general sense these policies address the following:

- Policy 1: Recognises the benefits of the National Grid;
- Policy 2: Recognises and provides for the effective operation, maintenance, upgrading and development of the National Grid;
- Policies 3 to 5: Weighs the management of environmental effects against the operational constraints, site/route selection approach, and the requirements of existing assets;
- Policies 6 to 8: Reducing, minimising and avoiding adverse effects in differing contexts;
- Policy 9: Potential health effects;
- Policies 10 and 11: Managing adverse effects on the National Grid and providing for “buffer corridors”;
- Policy 12: Mapping the National Grid; and
- Policies 13 and 14: Long-term development and planning for transmission assets.

Section 75(3) of the RMA requires a District Plan to give effect to a National Policy Statement (NPS). The Supreme Court recently considered what is meant by the phrase “give effect to” in the context of the New Zealand Coastal Policy Statement (NZCPS) and held that:

“Give effect to” simply means “implement”. On the face of it, it is a strong directive, creating a firm obligation on the part of those subject to it ... There is a caveat, however. The implementation of such a directive will be affected by what it relates to, that is, what must be given effect to. A requirement to give effect to a policy which is framed in a specific and unqualified way may, in a practical sense, be more prescriptive than a requirement to give effect to a policy which is worded at a higher level of abstraction. “

⁴ Resource Management (Forms, Fees, and Procedure) Amendment Regulations (No 2) 2006

The Supreme Court held that the “requirement to ‘give effect to’ the NZCPS is intended to constrain decision-makers”. Transpower submit that this applies equally to the NPSET in the context of decisions relating to electricity transmission. Similarly, the observation that the “NZCPS is a carefully expressed document whose contents are the result of a rigorous process of formulation and evaluation. It is a document which reflects particular choices” applies to the NPSET. The preamble of the NPSET highlights that the National Grid has particular physical characteristics and operational/security requirements that create challenges for its management under the RMA, and it is important there are consistent policy and regulatory approaches by local authorities.

Council must determine how to give effect to the NPSET, and similarly future Hearings Panel must consider the NPSET in decisions on submissions. It is noted that the NPSET, along with further supporting documents, including an implementation guide, are available on the Ministry for the Environment website⁵.

Giving effect to the NPSET will ensure that:

- The National Grid is able to be effectively and efficiently operated, maintained, upgraded and developed; and
- The adverse effects of development in proximity to the National Grid are managed and are reduced, minimised or avoided depending upon the context in which the development occurs.

4.2 Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009

The NESETA came into effect on 14 January 2010 and sets out a national regulatory framework for activities related to existing National Grid lines, including the operation, maintenance and upgrading of such lines. The NESETA specifies permitted electricity transmission activities (subject to standards) and resource consent requirements where these activities do not meet the standards.

The NESETA only applies to the National Grid lines that existed at 14 January 2010 and does not apply to new lines or substations. As with the NPSET, the NESETA does not apply to electricity distribution lines.

Under section 44A of the RMA, local authorities are required to ensure there are no duplications or conflicts between the provisions of the NESETA and a proposed plan (inclusive of plan changes). The provisions of the NESETA are therefore of particular relevance to the Proposed Wanganui District Plan.

5 Transpower’s Submission

Transpower generally supports the approach taken by the Council to providing for the National Grid in the proposed Plan Changes, including the consideration of network utilities in a separate and stand-alone chapter. Transpower also acknowledges the fact that a link to the NPSET is provided with the proposed Plan Change documentation and is supportive of this approach.

Transpower recognises that Wanganui District Council is reviewing the District Plan in phases and, so far, Transpower has submitted on:

- Phase 1: City Centre and Riverfront;

⁵ at <http://www.mfe.govt.nz/rma/central/transmission>

- Phase 2: Residential (which incorporated Rural Lifestyle, Neighbourhood Commercial, Natural Hazards, Subdivision, Earthworks and Infrastructure and Reserves and Open Space);
- Phase 4: Designations, Protected Trees and Verandah Posts) - gave notice to roll over two designations; and
- Phase 5: Rural, Papakāinga, Hazards and Archaeology.

Transpower supports the inclusion of provisions that recognise the national significance of the National Grid and provide for the protection of the network from activities that may compromise its efficient operation, maintenance, upgrading and development. Transpower acknowledges that many of these provisions will be introduced into the District Plan via Plan Change 36 (Rural)⁶, and are outside the scope of the current proposed Plan Changes.

Transpower's detailed submission highlights some areas where provisions need to be added, amended or deleted to fully give effect to the NPSET. Some of the requested changes are as a result of Transpower's evolving approach to the management of activities near the National Grid as it works with Council's around the country on various plan processes.

5.1 Enabling National Grid Activity

While the NESETA manages and regulates transmission lines that were built before 14 January 2010, it does not manage or regulate substations. Further, the construction of new lines in the future to satisfy electricity demand cannot be ruled out. Therefore, the District Plan needs to contemplate and provide an enabling framework for the development of the National Grid as a matter of national significance. The proposed district wide network utility plan change (Plan Change 44) is therefore of particular importance to Transpower. The provisions of Proposed Plan Change 44 need to give effect to Policies 1 – 9 of the NPSET

In light of Policies 1 -9 of the NPSET, and providing an enabling framework, the provisions of the Wanganui District Plan need to ensure:

- the sustainable management of the National Grid as a physical resource of national significance are recognised;
- the National Policy Statement on Electricity Transmission 2008 (NPSET) is given effect to;
- the benefits of the National Grid at a local, regional and national level are recognised;
- appropriate provision for the effective operation and maintenance of the network, including ensuring that transmission lines can be accessed as part of subdivision and development;
- that the National Grid can be upgraded and developed in order to meet growth in energy demand and that there may be technical and operational requirements of the network that dictates route, sites and method selection; and
- appropriate provision for the planning and development of new transmission assets.

5.2 Managing Adverse Effects on the National Grid

While noting many of the reverse sensitivity provisions are outside of the scope of the proposed Plan Changes (many have been sought to be introduced via Plan Change 36 (Rural)), Transpower's detailed submission points also addresses some matters that are directly related to Policies 10 and 11 of the NPSET. These policies ensure that the National Grid is appropriately "buffered" from activities that may have an adverse effect in terms of on-going operation,

⁶ Transpower understands some of the those provisions remain under appeal and are therefore not yet operative

maintenance, upgrade and development of the National Grid. Policies 10 and 11 of the NPSET provide the primary guidance to the management of adverse effects on the National Grid.

Policy 10 is as follows:

"In achieving the purpose of the Act, decision-makers must to the extent reasonably possible manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised."

Policy 11 is as follows:

"Local authorities must consult with the operator of the National Grid, to identify an appropriate buffer corridor within which it can be expected that sensitive activities will generally not be provided for in plans and/or given resource consent. To assist local authorities to identify these corridors, they may request the operator of the National Grid to provide local authorities with its medium to long-term plans for the alteration or upgrading of each affected section of the National Grid (so as to facilitate the long-term strategic planning of the grid)."

Under Policy 10, the Council is obliged to manage "to the extent reasonably possible" activities to avoid reverse sensitivity effects. It is "reasonably possible" for the Council to manage activities using district plan rules, including rules applying to the activities within buffer corridors.

Policy 11 of the NPSET requires local authorities to identify a buffer corridor, and Transpower acknowledges the existing District Plan provisions which give effect to this requirement. These provisions are outside the scope of the proposed Plan Changes.

5.3 Summary

In summary, Transpower's submission generally seeks the following:

- Appropriate recognition of the NPSET and NESETA in the hierarchy of RMA documents and the role it plays in establishing national policy, and managing and regulating National Grid activities and operations within the district;
- Retention of a number of definitions, and the inclusion of further definitions to clarify the rules and plan users' understanding of the National Grid;
- Inclusion of some additional rule and policy based measures to protect the National Grid; and
- Setting an enabling framework for any future development of the National Grid by applying no higher threshold activity status than a discretionary activity status.

Transpower New Zealand Limited seeks the following decision from the local authority:

Amend the Proposed Plan to make all required changes, including the specific amendments set out in the following tables; and such further, alternative or consequential relief as many be necessary to fully give effect to this submission.

Transpower wishes **to be heard in support of its submission.**

Due to the specific interests of Transpower in the context of the National Grid, Transpower will not consider presenting a joint case with others at a hearing.

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.....
**Signature of the person authorised to sign
on behalf of Transpower New Zealand Limited**

Date: 30 June 2015

Refer submission 7

PC 42

Policy 16.3.1 Signs	Support with amendment	to be included in proposed Network Utility Policy 22.3.2) be included to give effect to Policies 10 and 11 of the NPSET.	visual obstruction. ■ Amend Policy 16.3.1 To enable signs to be erected where the safe and efficient operation of regionally and nationally important infrastructure networks including footpaths, is maintained.
New non complying activity status	Oppose	Transpower seeks the inclusion of non-complying activity status for signs which may compromise the safe and efficient operation and maintenance of regionally and nationally important infrastructure networks, and specifically the National Grid. This will give effect to Policies 10 and 11 of the NPSET.	■ Add a new non complying activity status: <u>The erection or construction of a sign exceeding 2.5m in height, including its support structure, is a non-complying activity if:</u> a. <u>it is erected or constructed within the National Grid Yard, or</u> b. <u>restricts or prevents access to a National Grid asset.</u>

Relocated Buildings and Temporary Military Training Activities

Refer submission 6

PC 43

19.4 Rules for Relocated Buildings	Support	Transpower supports the need for relocated buildings (including temporary) to comply with the underlying zone based rules. Relocated buildings have the potential to adversely affect the operation and maintenance of the National Grid and need to be considered in this context, as provided for in the zone based rules. Transpower considers it is unclear as to which rules (i.e. zone based or district-wide earthworks) take precedence and determine activity status, but considers the zone based rules should determine this.	■ Retain the following sentence under 19.4 All activities shall comply with the Performance Standards within this chapter and the underlying zone, overlay as well as other relevant chapters. ■ Seek clarification that it is the zone based rules which take precedence and determine activity status.
Rule 19.6 Rules for temporary military training activities	Oppose	Transpower does not wish to hinder the establishment and operation of Defence activities but seeks confirmation that the land on which defence related activities will be undertaken is not traversed by National Grid Infrastructure. However, when structures or earthworks (either temporary or permanent) occur within close proximity to the National Grid, there is the potential for its safe and efficient operation to be compromised. Therefore, on a precautionary and interim basis, Transpower seeks that the zone based earthworks and structures provisions in which National Grid infrastructure are located is referenced as being applicable. This will give effect to Policies 10 and 11 of the NPSET. Transpower considers it is unclear as to which rules (i.e. zone based or chapter rules) take precedence and determine activity status, but considers the zone based rules should determine this.	■ Amend the first sentence under the rule heading: Temporary Military Training Activities are not required to comply with the requirements of any other part of the Plan except earthworks and permanent structures which are subject to the zone rules. ■ Seek clarification that it is the zone based rules which take precedence and determine activity status.

Financial Contributions

General	Neutral	Transpower believes a clear statement should be included in the plan change provisions to the extent that the development of public infrastructure, such as the National Grid, is not liable for financial contributions. In the past Transpower has had to defend this position at consent hearings, unnecessarily costing both time and money to clarify. Transpower is happy to provide further clarity on this issue should it be required.	■ Add a statement to the effect that the development of public infrastructure is not subject to financial contributions.
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Chapter 22 - Network utilities

Refer submission 3

PC 44

Introductory text, first paragraph	Support	Transpower supports the approach of including network utility related infrastructure provisions in a stand-alone chapter.	■ Retain the sentence: The objectives, policies and rules in this chapter apply across the District. They are grouped together to prevent repetition throughout the Plan.
Introductory text, third paragraph	Support	Transpower seeks the inclusion of additional text to better reflect the nature of Transpower's activities without compromising its application to other utilities. Transpower supports recognition that there may be technical, operational and locational constraints on infrastructure (Policy 2 of the NPSET). Transpower seeks additional text to better align with Policy 4, and in particular the extent to which the route, site or method selection process has avoided, remedied or mitigated adverse effects.	■ Amend the text as follows: ■ Although these network utility operations, improvements and maintenance, <u>upgrading and development</u> can have adverse effects on the environment, it is recognised in the Plan that due to their technical, locational and operational constraints it might not be possible or practicable to avoid, remedy or mitigate all adverse effects of network utilities. In such circumstances there is a need to carefully consider both the benefits that the network utility will provide to the district <u>(and beyond)</u> , the extent to which any adverse effects have been avoided remedied or mitigated by

SUBMISSION

TELEPHONE 0800 327 646 | WEBSITE WWW.FEDFARM.ORG.NZ



To: Wanganui District Council

From: Wanganui Federated Farmers of New Zealand

Submission on: **PLAN CHANGE 40 – 45
WANGANUI DISTRICT PLAN**

Date: 30 June 2015

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

1. INTRODUCTION

- 1.1 Farming has a strong presence in Wanganui and contributes significantly to the region. Federated Farmers seeks to uphold and enhance the value of farming. Wanganui Province of Federated Farmers of NZ therefore thanks the Council for this opportunity to provide a submission on Wanganui District Plan 40 - 45. We look forward to being involved in the process moving forward.

- 1.2 The following comments are representative of member views and experiences with the management of resources within the Wanganui District. It reflects the fact that resource management and District Council policies and plans impact on our member's daily lives as farmers, members of the local community, landowners and ratepayers.
- 1.3 It is important that it is not viewed as a single submission, but rather as a collective one that represents the opinions and views of our members.

SUMMARY OF RECOMMENDATIONS

- 1.4 Federated Farmers does not support the inclusion of a Bird Management Plan within the District Plan provisions. We therefore request that any reference to a 'Bird Management Plan' are deleted.

- 1.5 Federated Farmers notes that the definition for Noise excludes "*d. Livestock noise and intermittent noise from rural machinery in the rural zones*". Federated Farmers proposes that the word intermittent is deleted from this exemption. Some activities that occur in farming activities cannot be considered intermittent, for example regular dairy milking.

- 1.6 Federated Farmers opposes removing beekeeping from the definition of rural activities, as it is a legitimate rural activity. We also support the inclusion of artificial crop protection structures and rural airstrips in the definition as these are integral rural activities.

- 1.7 To reflect the significance of the adversity that infrastructure can create, Federated Farmers proposes that 3.1.4 is amended as follows:

Some infrastructure facilities, especially the roading network, electricity transmission and distribution networks and telecommunication facilities have specific locational and operational requirements resulting in a need to establish in the rural environment. While these facilities are an essential part of the District's infrastructure, they can have a direct impact on land holders as business operators and hosts of the infrastructure.

- 1.8 Federated Farmers notes that the objective provided at 3.2.2 recognises that rural activities are not compromised by non rural activities. To make this clear in the objective, we **propose that the objective is reworded as follows:**

Rural activities and other established land uses ~~that have a functional necessity to be located within the rural environment. Including regionally or nationally significant infrastructure are not.~~ These activities should not be compromised by the establishment of non-rural activities, including regionally or nationally significant infrastructure.

- 1.9 Federated Farmers proposes the following addition to 10.2.5 to recognise the existing production land uses on those margins or adjoining text.

10.2.5 Preserve and protect the natural character of key waterways which provide significant spiritual, cultural, amenity or access value to the community, where this does not compromise existing production land uses on those margins or adjoining land.

- 1.10 Federated Farmers proposes that policies 10.3.2 and 10.3.8 are amended to include text that provides for minor effects on riparian margins. These

3. Comments relating to Consultation Documents

- 3.1 Federated Farmers understands that Proposed Plan Changes largely reflect the need to align with the Manawatu Whanganui Regional Council (Horizons) combined Regional Policy Statements, the One Plan. Federated Farmers therefore accepts that to a greater extent, the updated provisions of the District Plan, are intended to give effect to regional developments and provisions.

Financial Contributions – Plan Change 40

- 3.2 We note that the Council has not charged financial contributions for the previous five years, instead relying on the use of development contributions to recover from developers. Of the three options proposed by Council to update the plan, we recognise that Option 3, 'Review current provisions for financial contributions and make them specific' is the preferred option.
- 3.3 Federated Farmers also accepts that it is necessary to update the Plan Provisions to ensure that Council's statutory obligations are fulfilled. We also note the additional benefits noted, of improved certainty to developers, along with a greater tool set of options to apply to recover contributions. We are supportive of Council efforts to ensure that Plan provisions are clear, transparent and efficient, and also, support attempts to ensure that mechanisms are fit for purpose and consider individual users specifically, rather than blanket 'one size fits all approaches'.
- 3.4 Federated Famers therefore supports the detail provided in 3.3 and 3.4 which we believe provides for individual consideration of the activity, and therefore, personalised calculation of the level of contribution required, if any.

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 government decisions impact on our member's daily lives as farmers and members of local communities.

Federated Farmers thanks the Wanganui District Council for considering our submission to the proposed Wanganui District Plan.