

SUMMARY OF EVIDENCE

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Submitter 600 / Further Submitter 1132

Proposed Queenstown Lakes District Plan - Definitions, Natural Hazards and Entire Plan.

Summary of Hearing Statement on behalf of Federated Farmers of New Zealand

My name is David Cooper. I am a Senior Policy Advisor for Federated Farmers of New Zealand. I have a Bachelor of Commerce in Economics and a Master of Arts in Politics.

Definitions - A large number of our submissions and further submissions relating to Definitions have been addressed in other hearing streams, in particular through the Rural and the Energy & Utilities hearing streams.

Our submissions included concerns that the proposed definition of 'Building' would capture irrigation infrastructure. As discussed in the Officer's report at section 8, this concern has been addressed sufficiently through Practice Note 1/2014.

We had further concerns the definition proposed for 'Formed Road' would not appropriately distinguish between publicly and privately owned roads. As the Officer's report discusses at section 11, the definition of 'Road' is the same as that outlined at section 315 of the Local Government Act 1974. This definition sufficiently addresses our concerns in relation to the definition for 'Formed Road'.

Natural Hazards - We have submitted in support of two specific Objectives in the proposed Natural Hazards Chapter; Objective 28.3.1 and Objective 28.3.2. In both instances, we supported the wording as proposed, as we considered the Objectives and subsequent policies struck a good balance between focusing on risks to human wellbeing while at the same time not being unnecessarily onerous for rural land use.

The Officer's report proposes amendments to the wording of Objective 28.3.1 to focus more on risks, rather than effects. As the Objective appropriately focusses on risk posed by natural hazards to the community and the built environment, we are supportive of the proposed amendment.

Whole of Plan – Federated Farmers has addressed our submissions to specific provisions of the Proposed District Plan ('the plan') through the relevant hearing streams to date. However, in the introduction to our initial submissions we outlined our support for the overall approach of the plan, and our support for the overall approach of the plan is worth restating here.

In particular, we have supported the plan's specific recognition of the significant contribution primary production makes both directly and indirectly to the economic, social and cultural well-being of the district.

The Queenstown Lakes District is unique in terms of the relative value placed on rural landscapes and rural amenity, and the relative importance of these amenity values. Farmers, farming practices and the economic viability and sustainability of farming are important for the management and retention of those positive values.

The District Plan in turn plays an important part in enabling the ongoing economic viability of farming in that if the provisions are inappropriate or onerous, they can impose significant and unnecessary costs. Importantly, these costs can include both direct regulatory costs, and costs resulting from uncertainty where the provisions are unclear or overly reliant on subjective values.

While we have some residual concerns with specific provisions, as a broad view we consider the proposed plan recognises and provides for or enables primary production activities where appropriate. Overall, the proposed provisions relating to the rural areas move towards a more permissible approach for expected, reasonable and compatible activities in those rural areas.

There is also greater certainty, and less subjectivity in the proposed plan. This is of benefit to plan users, but is a double edged sword. On one hand, this greater certainty reduces the ability for some land use decisions to be made, thereby imposing significant opportunity costs on farmers.

However, we consider the need for certainty and the broader issues facing the District outweigh these opportunity costs, particularly given the attempt to define and provide for or enable activities that are deemed to be compatible or expected in the rural areas.

There is one area of the Officer's report relating to the Entire Plan which we would like to specifically support. This is discussed at Issue 7 – *Avoiding Conflicts between water based activities and surrounding uses*.

The Officer's report recommends that issues relating to conflicts between water based activities and surrounding uses remain a regional council function. We fully support this recommendation, particularly given the range of Otago Regional Council's water quality and quantity related policies which are currently in either the consultation or early implementation phase. We consider any additional provisions along the lines of those sought by these submitters would result in unnecessary complexity.