



FURTHER SUBMISSION

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To: Hutt City Council

Further Submission on: Proposed District Plan for Hutt City.

Date: 24 July 2025

Submission by: **FEDERATED FARMERS OF NEW ZEALAND**

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Federated Farmers confirms it is eligible to make a further submission under RMA Schedule 1, clause 8, because we are a submitter on the proposed District Plan, and we are a membership and advocacy organisation that represents farmers in the Hutt City District.

FFNZ wish to be heard in support of our submission.

FURTHER SUBMISSION TO PROPOSED DISTRICT PLAN FOR HUTT CITY – FEDERATED FARMERS OF NEW ZEALAND (FFNZ)

SASM - Sites of Significance to Maori					
Plan Provision	Submission Point	Submitter	Support/ Oppose	Reasons for Further Submission	Decision Sought
SASM-S1 (Accidental discovery protocol)	248 #51	Heritage New Zealand	Oppose in part	While Federated Farmers agrees that accidental discovery procedure is important, Heritage NZ should provide the archaeologist in order to assess the site to determine if an authority must be applied for, to ensure they are fulfilling their statutory obligations. There are limited independent archaeologists in the lower North Island and Federated Farmers is concerned that the time-lag between the discovery and the assessment could be significant.	That the submission be rejected.
Definitions					
Plan Provision	Submission Point	Submitter	Support/ Oppose	Reasons for Further Submission	Decision Sought
Definition: Land-based primary production	202 #13	Aggregate and Quarry Association	Oppose	Federated Farmers opposes the inclusion of quarrying into the definition of <i>Land-Based Primary Production</i> , for the reason that quarrying is already in the definition of <i>Primary Production</i> which is consistent with the National Planning Standards. This is distinct from land-based primary production which includes livestock farming, forestry and growing.	That the submission be rejected.

				<i>Land-based primary production</i> is used throughout the Plan where discussing highly productive soils, so it is appropriate that it has a separate definition to <i>Primary Production</i> .	
Definition: Riparian margin	302 #04	Friends of Waiwhetū Stream	Oppose	Federated Farmers opposes the increase riparian margin distance from 10 metres to 20 metres, because the doubling of the distance will have regulatory implications for streams other than the Waiwhetu Stream, and no cost-benefit analysis has been conducted.	That the submission be rejected.
Definition: Reverse sensitivity	341 #3	NZ Pork Industry Board	Support	Federated Farmers supports the relief to replace the definition of reverse sensitivity, for the reason that the submitter's version is an accurate description of the issue. Federated Farmers is mainly concerned that farming is subject to reverse sensitivity effects from incompatible activities in the rural zones, and farming must be protected in the rural zones.	That the submission be accepted.
ECO - Ecosystems and Indigenous Biodiversity					
Plan Provision	Submission Point	Submitter	Support/ Oppose	Reasons for Further Submission	Decision Sought
Policies ECO-P1 to ECO-P4	405 #30e	Director General of Conservation	Oppose	Federated Farmers opposes the replacement of policies. The submitter's concern that indigenous vegetation is <i>only</i> managed in the residential zones, the Natural Open Space Zone, ONFLs, Coastal Natural Character overlays and coastal and riparian margins, is unfounded, because these overlays represent a substantial proportion of the entire district.	That the submission is rejected.

				47.8% of the Hutt City District is covered by the ONLs and 1.5% is ONF, where regulations seek to protect indigenous vegetation, and coupled with the other overlays and zones that have regulations, indigenous vegetation enjoys protection over most of the district.	
ECO-R2 (Indigenous vegetation removal)	405 #32a	Director General of Conservation	Oppose	<p>Federated Farmers opposes the submission to amend ECO-R2 and limit indigenous vegetation removal in the rural zone.</p> <p>The submitter's concern that indigenous vegetation is <i>only</i> managed in the residential zones, the Natural Open Space Zone, ONFLs, Coastal Natural Character overlays and coastal and riparian margins, is unfounded, because these overlays represent a substantial proportion of the entire district.</p> <p>47.8% of the Hutt City District is covered by the ONLs and 1.5% is ONF, where regulations seek to protect indigenous vegetation, and coupled with the other overlays and zones that have regulations, indigenous vegetation enjoys protection over most of the district.</p>	That the submission is rejected.
ECO- New rule	424 #1a	Royal Forest and Bird Protection Society of New Zealand Inc.	Oppose	Federated Farmers opposes the introduction of SNAs for the reason that significant indigenous vegetation is already protected within Crown-owned land which represents a significant proportion of the district, therefore the Plan is already meeting obligations under Section 6(c) of the RMA.	That the submission is rejected.
ECO- New rule	424 #2b	Royal Forest and Bird Protection Society of New Zealand Inc.	Oppose	Federated Farmers opposes the relief seeking new policy, rules and fencing standards to restrict domestic goats, for the reason that wild goats are already	That the submission is rejected.

				managed by the Wild Animal Control Act 1977 and the Greater Wellington Regional Pest Management Plan 2019–2039. Livestock control is not a district council function under the RMA, nor is the Council equipped to monitor and enforce provisions for livestock goats.	
ECO-R1 (Exotic vegetation removal)	424 #43	Royal Forest and Bird Protection Society of New Zealand Inc.	Oppose	Federated Farmers opposes the relief seeking deletion of ECO-R1, for the reason that the purpose of indigenous vegetation protection is already achieved through ECO-R2. There is marginal benefit for indigenous biodiversity in requiring consent for exotic vegetation removal, and such a consent requirement will hinder pest plant removal and everyday activities that provide for social, economic and cultural wellbeing of people and communities.	That the submission is rejected.
ECO-R2 (Indigenous vegetation removal)	424 #44a #44b	Royal Forest and Bird Protection Society of New Zealand Inc.	Oppose	Federated Farmers opposes the relief seeking amendments to ECO-R2 and non-complying status for activities that don't meet standards, for the reason that there are many situations where clearance and trimming is necessary for social, economic and cultural wellbeing, and health and safety. The district plan would not otherwise meet RMA s.5 purpose.	That the submission is rejected.
NFL – Natural Features and Landscapes					
Plan Provision	Submission Point	Submitter	Support/ Oppose	Reasons for Further Submission	Decision Sought

NFL-P4 (Indigenous vegetation removal in Outstanding Natural Features and Landscapes)	424 #65	Royal Forest and Bird Protection Society of New Zealand Inc.	Oppose	Federated Farmers opposes the relief to delete policy NFL-P4 for the reason the policy is necessary and provides for clearance and trimming of indigenous vegetation on ONFLs which is necessary for social, economic and cultural wellbeing, and health and safety. The district plan would not otherwise meet RMA s.5 purpose. Not all indigenous vegetation on ONFLs will be contributing to the outstanding values.	That the submission is rejected.
NFL-P6 (New use and development in Outstanding Natural Features and Landscapes)	424 #67	Royal Forest and Bird Protection Society of New Zealand Inc.	Oppose	Federated Farmers opposes the relief to amend NFL-P6, for the reason that matters of consideration should be restricted to effects on the identified values of the subject ONFL.	That the submission be rejected.
NFL-R7 (New farming fences in Outstanding Natural Features and Landscapes)	424 #74b	Royal Forest and Bird Protection Society of New Zealand Inc.	Oppose	Federated Farmers opposes the addition of additional matters for consideration regarding effects on indigenous biodiversity from new farm fences in ONFLs, for the reason that fencing is a necessary and appropriate activity in the rural zones, and impacts on biodiversity are de minimus and outweighed by the benefit. Indigenous biodiversity is already managed by the ECO provisions and there is no need to duplicate in the ONFL chapter.	That the submission be rejected.
NFL-R8 (Additions to existing buildings and structures in Outstanding Natural)	424 #75	Royal Forest and Bird Protection Society of New Zealand Inc.	Oppose	Federated Farmers opposes the addition of additional matters for consideration regarding effects on indigenous biodiversity from additions to structures in ONFLs, for the reason that additions to an existing structure are an appropriate activity in the rural zones, and impacts on biodiversity are de minimus and outweighed by the benefit. Indigenous biodiversity is	That the submission be rejected.

Features and Landscapes)				already managed by the ECO provisions and there is no need to duplicate in the ONFL chapter.	
NFL-R9 (New buildings and structures in Outstanding Natural Features and Landscapes)	424 #76	Royal Forest and Bird Protection Society of New Zealand Inc.	Oppose	Federated Farmers opposes the addition of additional matters for consideration regarding effects on indigenous biodiversity from new buildings and structures in ONFLs, for the reason that additions to an existing structure are an appropriate activity in the rural zones, and impacts on biodiversity are de minimus and outweighed by the benefit. Indigenous biodiversity is already managed by the ECO provisions and there is no need to duplicate in the ONFL chapter.	That the submission be rejected.
NFL-S1 (Indigenous vegetation removal in Outstanding Natural Features and Landscapes)	424 #77	Royal Forest and Bird Protection Society of New Zealand Inc.	Oppose	Federated Farmers opposes the new indigenous vegetation clearance standard sought by the submitter, for the reason that indigenous biodiversity is already managed by the ECO provisions and there is no need to duplicate in the ONFL chapter.	That the submission be rejected.
PA – Public Access					
Plan provision	Submission point	Submitter	Support/oppose	Reasons for Further Submission	Decision sought
PA-P3 (Restriction of public access)	509 #11	Wellington Fish and Game Council	Oppose	Federated Farmers opposes the relief sought to require alternative access, for the reason that it is at the landowners' permission whether access is granted or declined and the district plan must not compel public access over private property.	That the submission be rejected.
GRUZ – General Rural Zone					

Plan Provision	Submission Point	Submitter	Support/ Oppose	Reasons for Further Submission	Decision Sought
Rural Zones Entire chapters	424 #2c	Royal Forest and Bird Protection Society of New Zealand Inc.	Oppose	Federated Farmers opposes the relief seeking new policy, rules and fencing standards to restrict domestic goats, for the reason that wild goats are already managed by the Wild Animal Control Act 1977 and the Greater Wellington Regional Pest Management Plan 2019–2039. Livestock control is not a district council function under the RMA, nor is the Council equipped to monitor and enforce provisions for livestock goats.	That the submission be rejected.
THW - Three Waters New rule - THW-Rxxx (New buildings (except accessory buildings), conversions of existing buildings and new allotments – Rural Zones)	374 #30	Fire and Emergency New Zealand	Oppose	<p>Oppose the submitter seeking a new Rural zone standard requiring provision of 10,000l of potable water for the purpose of firefighting for new buildings, building conversions and new allotments.</p> <p>Federated Farmers questions the value of such a rule in the district plan, given that the Building Act will already require a potable water supply to new rural houses/lots. This rule requiring potable water will exclude surface water such as a dam which is entirely suitable for firefighting, and will exclude on-demand water supplies where storage is not provided. The fire-fighting engines also transport water to the emergency. If their water supply is insufficient, the local fire-fighting entity should invest in an additional tanker themselves rather than passing the cost onto property owners. The Code of Practice is a guideline document that should be considered during a Building Act consent application, it is not legislation, nor is it required under the RMA.</p>	That the submission be rejected.

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.

This submission is 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 Hutt City Council for considering our further submission to the proposed District Plan.

