

SUBMISSION

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



To: Stratford District Council

From: Taranaki Federated Farmers of New Zealand

Submission on: **STRATFORD DISTRICT PLAN ROLLING REVIEW PART 1
INDIGENOUS FOREST & BIODIVERSITY**

Date: 4 October 2010

Contacts: Kelly Martyn
Regional Policy Adviser
Federated Farmers of New Zealand
PO Box 422
NEW PLYMOUTH 4340

P: 06 757 3425
F: 06 757 3424
E: kmartyn@fedfarm.org.nz

Peter Adamski
Provincial President
Taranaki Federated Farmers

P: 06 751 4217
E: pkadamski@orcon.net.nz

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

INTRODUCTION

Farming has a strong presence in Taranaki and contributes significantly to the region. Federated Farmers seeks to uphold and enhance the value of farming.

Taranaki Province of Federated Farmers of NZ therefore thanks the Council for this opportunity to provide a submission on Rolling Review Part 1 – Indigenous Forest & Biodiversity. We look forward to being involved in the process moving forward.

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.

SIGNIFICANCE DETERMINATION PROCESS

Federated Farmers recognises that Council is working hard to meet its responsibilities under section 6(c) of the Resource Management Act while trying to balance those responsibilities with practical solutions for the environment and landowners.

A robust process of identifying significant indigenous vegetation and significant habitat of indigenous fauna can be very costly for ratepayers and as such is often not entered lightly by most councils. However, if a council decides to use a "catch all" rule instead of incurring the expense of a robust identification process, even indigenous vegetation of no significance will require an arduous and potentially unnecessary resource consent process for both resource users and Council. A catch-all rule can result in unnecessary constraints on activities which could limit the ability of people and communities to provide for their social, economic and cultural well-beings.

Federated Farmers have been involved with indigenous vegetation clearance issues in most Districts throughout New Zealand and as such can try to bring the best parts of various policy approaches together to seek resolution or common ground from which to move forward on. One such possible option is a general clearance rule supported by methods to identify the ecological significance of indigenous vegetation on an application basis.

This approach has worked with success for Waitomo District Council. Federated Farmers appealed against the proposed Waitomo District Plan in relation to rules governing clearance of indigenous vegetation in the rural zone (ENV-2006-WLG-000283.) The appeal was resolved by consent order in 2007. Rule 11.5.4.5 and Method 11.7.1 have since been incorporated into the Waitomo District Plan.

The approach that Waitomo District Council has adopted consists of a discretionary status for indigenous vegetation clearance if the activity does not meet the permitted standards. This rule is supported by a corresponding method to determine the significance of the indigenous vegetation.

Once the discretionary status of the proposed activity is determined, an informal application outside the resource consent process is made to Council. Council will fund an ecological assessment for the subject site to determine significance assessed against criteria in the plan. This will then be the basis of an Assessment of Environmental Effects should an application for resource consent be initiated. The information provided in the assessment will ensure a resource user is provided with detailed and accurate data to make an informed decision as to merits of undertaking the activity and the likelihood of a successful resource consent application.

This approach has a number of advantages for Council as outlined below:

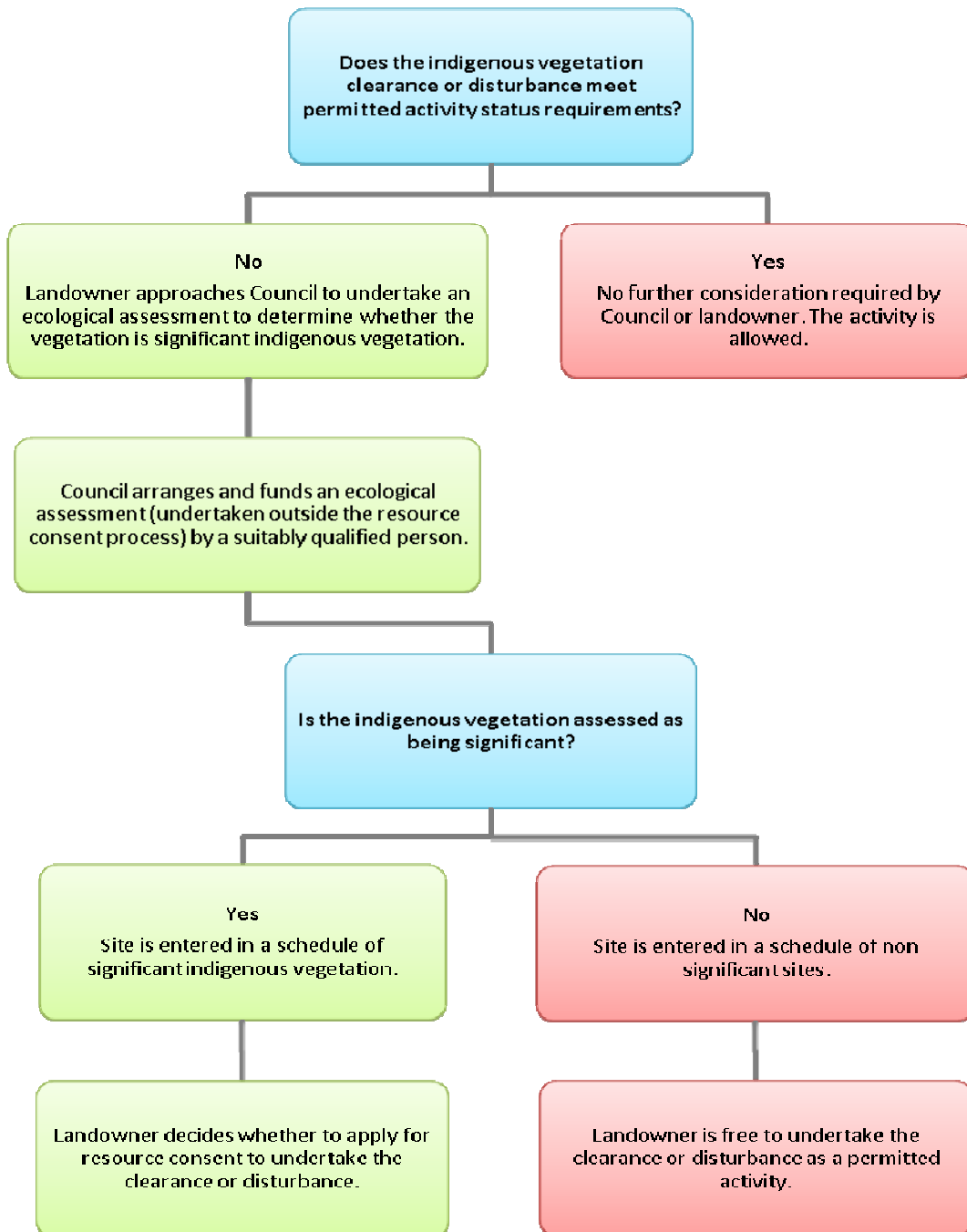
1. A full investigation of the significance of indigenous vegetation sites in the entire district will not need to be undertaken. This will reduce the Council's cost of gathering and ground-truthing information.
2. Assessments will be on an application basis, ensuring that only those sites which are at risk of being cleared are investigated for level of significance.
3. The assessed significance of sites will be based on robust criteria that can be inserted into the Plan. This will mean that all sites are assessed equally.
4. The schedule can be reviewed during a plan change, and incorporated into the Plan if appropriate.
5. Clearance of indigenous vegetation for sites which have not been through the ecological assessment process will still be protected by the permitted activity standards.

This approach also has advantages for resource users and other stakeholders:

1. Permitted activity standards still allow for some indigenous vegetation clearance where appropriate.
2. For proposed activities with a discretionary status, the resource user will not have to fund the ecological assessment in recognition that this information will help council meet their Section 6(c) RMA responsibilities.
3. The resource users can make a fully informed decision whether to proceed with a consent application based on the level of significance and likelihood of obtaining consent.
4. The resource users will know the level of significance of the site, and may undertake voluntary protection or active management actions.
5. Stakeholders with a vested interest or legislative responsibility such as Iwi, Department of Conservation, Forestry companies and the Royal Forest and Bird Protection Society have the opportunity to be involved in the process for how the ecologist will be approved. The Waitomo and Gisborne District Councils have working examples in their operative plans. Some councils have set up Significant Natural Area Committees to address this aspect of the process.

While recognising that the intention of the discussion document was not to explore specific rules, definitions or assessment criteria, Federated Farmers believes that this approach supports the intent of the Stratford District Plan Indigenous Forest Review. This approach provides a sensible compromise to ensure the District's truly significant indigenous vegetation is protected while avoiding high, upfront cost for ratepayers or unnecessary resource consent applications for landowners.

In practice, such a process works as follows:



Relief Sought:

That Council include methods and rules in the Stratford District Plan to implement the above process.

Notwithstanding the relief sought above, the following table outlines specific subject matters in the Proposed District Plan Variation.

Subject Matter Or Provision In Proposed Plan	Support / Oppose	Summary of Reasons For Submission	Federated Farmers Relief Sought
Definitions			
Clearance	Oppose	<p>Federated Farmers opposes this definition of “clearance” as it does not provide a trigger level in area or a time limit, therefore the removal of one tree could be defined as clearance. Also, while Council has provided a canopy height, there is no requirement for the canopy to be contiguous. This means that where there is a stand of trees, where the trees are of such a distance apart as they do not touch are included in the definition. An example of this is scattered trees over pasture which provide shade for stock. Federated Farmers believes that individual indigenous plants cannot be deemed significant indigenous vegetation and therefore should not be included in the “clearance” definition.</p>	<p>Amend the “clearance” definition as follows:</p> <p>Means the felling, removal or destruction of <u>more than 2 hectares per annum</u> of indigenous vegetation by any means where that indigenous vegetation in the area has a predominant <u>contiguous</u> canopy height of 3m or greater.</p>
Indigenous Vegetation	Oppose in part	<p>Federated Farmers submits that the term “predominance” does not provide enough certainty for landowners to decide whether or not their area of vegetation is classified as indigenous vegetation.</p> <p>Also, manuka and any other indigenous vegetation which exists as a result of previous clearing activities should be included from the definition of “Indigenous vegetation disturbance” as they are not there by natural means, rather as a result of human actions.</p>	<p>Amend the “Indigenous Vegetation” definition as follows:</p> <p>Means where there is a <u>predominance greater than 80%</u> of indigenous species including trees, grasses, shrubs or other plants but EXCLUDING any indigenous vegetation beneath plantation forestry or indigenous species used in domestic landscaping or gardens and species growing as a result of human actions, e.g. regenerated manuka on previously cleared land.</p>
Indigenous vegetation disturbance	Oppose in part	<p>Federated Farmers submits that manuka and any other indigenous vegetation which exists as a result of previous clearing activities should be excluded from the definition of “Indigenous vegetation disturbance” as they are not there by natural means, rather as a result of human actions.</p>	<p>Amend the “Indigenous forest vegetation disturbance” definition as follows:</p> <p>Means felling, destruction or damage to indigenous forest vegetation, including indigenous trees, manuka, kanuka, grasses, shrubs and or other plants <u>(except when those plants</u></p>

		Also, there are many other instances which occur as a result of normal farming practices which are, not included in Council's list of exemptions, when the removal of vegetation is necessary and should not be included in the definition of "Indigenous vegetation disturbance" these include the establishment of fences and the establishment and maintenance of farm tracks, the establishment and maintenance of drains and culverts.	<u>have regenerated from previously cleared land</u>), by any means including cutting, burning, crushing or spraying except that indigenous forest disturbance does not include: (b) tree trimming or the selective removal of vegetation necessary for the current operation and maintenance of existing legally established infrastructure, including roads, stream or river access, fire water points, utilities and the upgrading of utilities, structures and fence lines; <u>and the establishment of fences and the establishment and maintenance of farm tracks, the establishment and maintenance of drains and culverts.</u> (or words to that effect)
Significance	Addition	Whether indigenous vegetation is significant or not should be the deciding factor in whether that indigenous vegetation can be disturbed or cleared.	That Council, in conjunction with suitably qualified persons and interested organisations, develops a set of criteria for significance that indigenous vegetation can be assessed against to determine its significance.
Significant Indigenous Vegetation	Addition	Federated Farmers submits that section 6 of the RMA requires that Council protect significant indigenous vegetation. Because of this, the District Plan should define what significant indigenous vegetation is.	Add "significant indigenous vegetation" definition as follows: <u>Indigenous vegetation which has been assessed by a suitably qualified person with documented expertise in the ecology of indigenous vegetation within the Taranaki region or Stratford District and has been found to meet the criteria for significance.</u> (or words to that effect)
Sustainable forest management permit	Support	Federated Farmers supports this definition	Retain as read
Sustainable forest management plan	Support	Federated Farmers supports this definition	Retain as read
Water body	Support	Federated Farmers supports this definition	Retain as read
Anticipated Environmental Result (AER)			
A2.6.1	Support	Federated Farmers supports the AER that areas of "significant" indigenous vegetation are protected as this is	Retain as read.

		consistent with section 6 of the Resource Management Act 1991 (RMA)	
A2.6.2	Oppose	Federated Farmers opposes Council having an AER for the management of indigenous vegetation which is not significant. Council's section 6 responsibility is only to protect significant indigenous vegetation. Council is not required to ensure that "any use or management of indigenous vegetation in the District is undertaken on a sustainable basis" and therefore any attempt to do so is encroaching on the freedoms and property rights of landowners who have indigenous vegetation to manage the vegetation in the best way they see fit.	Delete A2.6.2
A2.6.3	Support	Federated Farmers supports the AER that areas of "significant" habitats of indigenous fauna are protected as this is consistent with section 6 of the RMA	Retain as read.
Objective			
A2.2.1	Support	Federated Farmers supports the objective that areas of "significant" indigenous vegetation are protected as this is consistent with section 6 of the RMA.	Retain as read.
A2.2.2	Support	Federated Farmers supports the objective that areas of "significant" habitats of indigenous fauna are protected as this is consistent with section 6 of the RMA.	Retain as read.
Policies			
A2.3.1	Oppose	Federated Farmers submits that by using the phrasing "to recognise the significance of indigenous vegetation for its role in:" is elevating the listed roles to section 6 status under the RMA when they are in fact on section 7 matters. Only significant indigenous vegetation and significant habitats of indigenous fauna have section 6 statuses, not all indigenous vegetation and stating that the policy is to "recognise the significance of indigenous vegetation" only confuses the status.	Amend A2.3.1 as follows: To recognise the significance of <u>give regard to</u> indigenous vegetation for its role in: ...

A2.3.2	Oppose in part	Federated Farmers submits that regardless of where the vegetation is located, it should only be protected by Council if it is significant. There is no requirement for Council to protect non-significant vegetation and therefore any attempt to do so is encroaching on the freedoms and property rights of landowners who have indigenous vegetation to manage the vegetation in the best way they see fit.	Amend A2.3.2 as follows: To protect areas of significant indigenous vegetation, and to protect areas of indigenous forest on the "ring plain" .
A2.3.3	Support	Federated Farmers supports the policy that areas of "significant" habitats of indigenous fauna are protected as this is consistent with section 6 of the RMA.	Retain as read
A2.3.4	Oppose in part	Federated Farmers submits that section 6 of the RMA only requires that "significant" indigenous vegetation be protected. Therefore, having a policy to "use the enforcement provisions of the Resource Management Act to protect an area of indigenous vegetation" is giving section 6 protection to non-significant vegetation.	Amend A2.3.4 as follows: To use the enforcement provisions of the Resource Management Act to protect an area of <u>significant</u> indigenous vegetation or an area which is a significant habitat of indigenous fauna from the adverse effects of land use, development, or subdivision, particularly when (but not limited to) an area of indigenous forest vegetation is being subject to clearance or selective harvesting or other use or management for which a resource consent is required in terms of this District Plan but which has not been obtained.
Methods			
A1.2.10 Riparian Margins Method	Support	Federated Farmers supports a schedule of identified wetlands.	Retain as read.
A2.4.1 Indigenous Forest Methods	Oppose	Federated Farmers submits that only significant vegetation should receive section 6 "protection" status and therefore having rules, standards and conditions on resource consents to protect indigenous vegetation which is not deemed significant is inappropriate	Amend A2.4.1 as follows: Rules and standards, and conditions and terms on resource consents will be used to ensure the retention and protection of areas of <u>significant</u> indigenous vegetation in the District in general, and to ensure that any proposed use or management of <u>significant</u> indigenous vegetation is only permitted on a sustainable basis, in terms of the Resource Management Act 1991.

A2.4.2 Indigenous Forest Methods	Support in part	<p>Federated Farmers supports requiring an ecological assessment of areas of indigenous vegetation, in order to determine its significance, where the significance of the indigenous vegetation has not previously been established.</p> <p>This support is provisional on Council adopting an appropriate definition of significance, the Council funding the ecological assessment and Council adopting Federated Farmers relief sought for the rules which would determine when a resource consent would be required.</p> <p>Federated Farmers submits that it would be prudent to develop a schedule of identified significant indigenous vegetation sites to be included in the District Plan. A schedule provides certainty to both resource users and Council.</p>	<p>Amend 2.4.2 as follows:</p> <p>To require an ecological assessment <u>to determine the significance</u> of any area of indigenous vegetation, <u>for which the significance has not already been determined</u>, in which a proposed activity is subject to land use consent prior to the consideration of any land use consent application. <u>In recognition that the retention of significant indigenous vegetation is for the wider community benefit, any costs associated with obtaining an ecological assessment will be met by Council. Any identified significant vegetation site shall be entered in a schedule of significant indigenous vegetation sites in the District Plan.</u> (or words to that effect)</p>
A2.4.3 Indigenous Forest Methods	Support	Federated Farmers supports a schedule of identified significant habitats of indigenous fauna.	Retain as read.
A2.4.4 Indigenous Forest Methods	Support	Federated Farmers supports encouraging the voluntary protection of areas of indigenous vegetation and significant habitats of indigenous fauna through covenants.	Retain as read.
A2.4.5 Indigenous Forest Methods	Support	Federated Farmers supports providing rates relief for any landowner who voluntarily covenants an area of significant indigenous vegetation or significant indigenous fauna. However, whether or not the significant indigenous vegetation and fauna is legally protected, Council rules are restricting the landowner's freedoms and property rights. Therefore, any significant indigenous vegetation or fauna habitat identified should attract the same rates relief.	<p>Amend A2.4.5 as follows:</p> <p>Economic instruments in the form of rates relief will be offered as compensation to any landowner who voluntarily covenants an area of indigenous vegetation or a significant habitat of indigenous fauna <u>or who has significant indigenous vegetation or a significant habitat of indigenous fauna identified on their property.</u> (or words to that effect)</p>
A2.4.6 Indigenous Forest Methods	Support in part	Federated Farmers feels it is appropriate to liaise with other agencies to determine whether a site is significant but not necessarily for all matters in evaluating a consent application.	<p>Amend A2.4.6 as follows:</p> <p>Liaison will also be conducted with other relevant agencies, particularly the Ministry of Forestry, with regard to seeking</p>

		Federated Farmers also submits that many agencies other than the Ministry of Forestry may also be able to provide advice on whether a site is significant e.g. Department of Conservation and Taranaki Regional Council.	information or advice that may be of relevance in evaluating a consent application <u>the significance of a site.</u>
A2.4.7 Indigenous Forest Methods	Support	Federated Farmers supports the monitoring of indigenous vegetation areas.	Retain as read.
A2.4.8 Indigenous Forest Methods	Support in part	Federated Farmers supports using a method of RMA enforcement mechanisms for the protection of significant indigenous vegetation and habitats only. This support is provisional on Council adopting an appropriate definition of significance, the Council funding the ecological assessment and Council adopting Federated Farmers relief sought for the rules which would determine when resource consent would be required.	Amend A2.4.8 as follows: To use the enforcement mechanisms of the Resource Management Act 1991 to ensure that any modification, use or management of <u>significant</u> indigenous vegetation or significant habitat of indigenous fauna is conducted in accordance with the provisions of this District Plan and/or the conditions of any resource consent granted by the District Council.
Rules			
B1.2.1.1 Rural Zone Permitted Activities Bullet point 1	Support	Federated Farmers supports the harvesting of indigenous forest that has been planted and managed for the purpose of harvesting being a permitted activity.	Retain as read.
B1.2.1.1 Rural Zone Permitted Activities Bullet point 2	Oppose	Federated Farmers opposes the deletion of bullet point 2. The harvesting of indigenous vegetation that has a legally established Sustainable Management Permit or Sustainable Forest Management Plan should be a permitted activity.	Reinstate bullet point 2.
B1.2.1.1 Rural Zone Permitted Activities Bullet point 3 (a)	Support in part	Federated Farmers supports the removal or trimming of any vegetation, including significant indigenous vegetation, being a permitted activity when the action is necessary to avoid imminent danger to human life. However we also submit that in terms of animal welfare it should also be a permitted activity to remove or trim the vegetation if it places danger to stock life. Federated Farmers also submits that in the interests of safety it should not be just "imminent" danger that allows the vegetation removal but any danger.	Amend B1.2.1.1 Bullet point 3 (a) as follows: Actions necessary for the avoidance of imminent danger to human <u>or stock life lives</u>

B1.2.1.1 Rural Zone Permitted Activities Bullet point 3 (b)	Support in part	Federated Farmers supports the removal or trimming of any vegetation, including significant indigenous vegetation, being a permitted activity when it is for the operation and maintenance of legally established infrastructure, however the list of infrastructure should include maintenance of farm tracks, the establishment and maintenance of drains and culverts.	Amend B1.2.1.1 Bullet point 3 (b) as follows: the operation and maintenance of legally established infrastructure, including roads, stream or river access, fire water 24 points, utilities and the upgrading of utilities, structures and fence lines to a maximum distance of 3 metres from the road, stream or river access, fire water point, utility, structure or fence, <u>farm track, drain or culvert</u> or, in the case of any electricity line, such distance as is prescribed by the Electricity (Hazards from Trees) Regulations 2003.
B1.2.1.1 Rural Zone Permitted Activities Bullet point 3 (c)	Support	Federated Farmers supports allowing the collection of material for scientific purposes or propagation.	Retain as read
B1.2.1.1 Rural Zone Permitted Activities Bullet point 3 (d)	Support	Federated Farmers supports allowing the collection of materials by tangata whenua for maintaining non-commercial traditional practices.	Retain as read
B1.2.1.1 Rural Zone Permitted Activities Bullet point 3 (e) (deleted)	Oppose	Federated Farmers submits that where a site has been assessed and not deemed to be significant, then it should be a permitted activity to disturb or clear the vegetation.	Reinstate B1.2.1.1 Bullet point 3 (e) and make the following amendments: <u>The disturbance and clearance of vegetation which is not included in the definition of the term "significant indigenous vegetation".</u>
B1.2.1.1 Rural Zone Permitted Activities Bullet point 3 (e)	Support	Federated Farmers supports allowing the disturbance or clearance of vegetation as part of a Farm management Plan or Agroforestry Plan or equivalent, registered with the Regional Council.	Retain as read.
B1.2.1.1 Rural Zone Permitted Activities Bullet point 3 (f)	Addition	Federated Farmers submits that it should be a permitted activity to disturb any vegetation for the purposes of establishing new tracks and fences, provided the area disturbed is no more than 10 metres in width and located	Add Rule B1.2.1.1 bullet point 3 (f) as follows: <u>The disturbance and clearance of any vegetation for the purpose of establishing new farm tracks or fence lines provided</u>

		more than 10 metres from any water body.	<u>the disturbed area is no more than 10 metres in width and located no closer than 10 metres to a water body.</u> (or words to that effect)
B1.2.1.1 Rural Zone Permitted Activities Bullet point 4	Oppose	Federated farmers opposes the deletion of bullet point 4 which allowed the clearance of manuka less than 3 metres in height and areas predominantly comprising manuka greater than 3 metres in height. Areas of manuka exist because of the clearance of forest originally and re clearing regenerating manuka is a normal farming practice.	Reinstate B1.2.1.1 bullet point 4
B1.2.1.1 Rural Zone Permitted Activities Bullet point 5	Support in part	Federated Farmers supports allowing the disturbance of indigenous vegetation where all the vegetation to be disturbed is less than 3 metres in height. However, we submit that it is unfair to disallow disturbance because a small proportion has grown to a height of over 3 metres. Federated Farmers also submits that if the vegetation is predominantly less than 3 metres it must be regenerating vegetation that is the result of previous clearing. For this reason, clearance of the vegetation should also be allowed.	Amend B1.2.1.1 Bullet point 5 as follows: The disturbance <u>and clearance</u> of indigenous vegetation where a over 80% of the vegetation in the area to be disturbed is less than 3m in height but EXCLUDING the disturbance of indigenous vegetation provided for as a non-complying activity by Rule B1.2.1.5.
B1.2.1.3 Rural Zone Limited Discretionary Activities	Oppose	Federated Farmers opposes the Limited Discretionary status for harvesting of indigenous vegetation that has a legally established Sustainable Management Permit or Sustainable Forest Management Plan. We submit that it should be reinstated as a permitted activity.	Delete B1.2.1.3 as a limited discretionary activity and reinstate it as a permitted activity.
B1.2.1.3.1 (g) Rural Zone Matters to which Discretion is Reserved	Oppose	Federated Farmers submits that B1.2.1.3 should be a permitted activity and therefore does not require "Matters to which Discretion is Reserved"	Delete B1.2.1.3.1 (g)
B1.2.1.4 Rural Zone Discretionary Activities	Support in part	Federated Farmers supports the Discretionary Activities. However, this support is provisional on Council adopting Federated Farmers relief sought on all other matters and the replacement of the terms "indigenous vegetation" with "significant indigenous vegetation"	Amend B1.2.1.4 as follows: Replace the terms "indigenous vegetation" with "significant indigenous vegetation"

B1.2.1.5 Rural Zone Non-Complying Activities bullet points 1-5	Support in part	Federated Farmers supports the Discretionary Activities. However, this support is provisional on Council adopting Federated Farmers relief sought on all other matters and the replacement of the terms “indigenous vegetation” with “significant indigenous vegetation”.	Amend B1.2.1.5 bullet points 1-3 as follows: Replace the terms “indigenous vegetation” with “significant indigenous vegetation”
B1.2.1.5 Rural Zone Non-Complying Activities bullet point 5	Oppose	Federated Farmers submits that the disturbance or clearance of manuka or kanuka over 3 metres high should be a permitted activity where the vegetation has undergone an ecological assessment and has been deemed not to be significant.	Amend B1.2.1.5 bullet point 5 as follows: <u>Significant</u> indigenous vegetation disturbance where that disturbance is of manuka or kanuka, and where <u>any more than 20%</u> of that manuka or kanuka to be disturbed is 3m or greater in height, and it has <u>undergone an ecological assessment which has deemed the vegetation to be significant</u> unless permitted by Rule B1.2.1.1 Bullet Point 13 (the removal or trimming of vegetation in specified circumstances). (or words to that effect)
B1.6.2 Protected Area Zone Rules	Oppose	Federated Farmers submits that it is unfair that it is a non-complying activity to undertake any land use, development or subdivision on any lot of land contiguous or directly opposite and road reserve, stream, or river which is contiguous with the boundaries of land defined in, held under and administered by the Reserves Act or National Parks Act or Conservation Act or Wildlife Act or any other act listed in the First Schedule of the Conservation Act. A “lot” of land can be large in size and activities could therefore be located some distance from the area to be protected. Federated Farmers submits that Council’s rules regarding land use, development or subdivision are ample enough to protect the boundaries without requiring this rule.	Delete B1.6.2
Standards			
B2.7 (b) bullet point 1	Support	Federated Farmers supports the Standard. However, this support is provisional on Council adopting Federated Farmers relief sought on all other matters.	Retain as read.

B2.7 (b) bullet point 2	Support in part	Federated Farmers supports the Standard. However, this support is provisional on Council adopting Federated Farmers relief sought on all other matters. It is also provisional on all references to indigenous forest/vegetation being changed to significant indigenous vegetation.	Amend B2.7 (b) bullet point 2 as follows: Replace the term “indigenous vegetation” with “significant indigenous vegetation”
Assessment Criteria for Discretionary & Non-complying Activities			
B5.5	Support in part	Federated Farmers supports the Assessment Criteria. However, this support is provisional on Council adopting Federated Farmers relief sought on all other matters. It is also provisional on all references to indigenous forest/vegetation being changed to significant indigenous vegetation.	Amend B5.5 as follows: Replace the term “indigenous vegetation” with “significant indigenous vegetation”
General Information Requirements for Controlled and Limited Discretionary Activities			
B6.1.2	Support in part	Federated Farmers supports the General Information Requirements. However, this support is provisional on Council adopting Federated Farmers relief sought on all other matters. It is also provisional on all references to indigenous forest/vegetation being changed to significant indigenous vegetation.	Amend B6.1.2 as follows: Replace the term “indigenous vegetation” with “significant indigenous vegetation”
General Information Requirements for Discretionary and Non-Complying Activities			
B6.3	Support in part	Federated Farmers supports the General Information Requirements. However, this support is provisional on Council adopting Federated Farmers relief sought on all other matters. It is also provisional on all references to indigenous forest/vegetation being changed to significant indigenous vegetation.	Amend B6.3 as follows: Replace the term “indigenous vegetation” with “significant indigenous vegetation”

Federated Farmers thanks New Plymouth District Council for this opportunity to submit to the proposed Ruapehu District Plan.