

# SUMMARY OF EVIDENCE

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Submitter 600 / Further Submitter 1132

*Proposed Queenstown Lakes District Plan - Rural, Rural Residential and Rural Lifestyle, Gibbston Character Zone, Indigenous Vegetation and Biodiversity, Wilding Exotic Trees.*

## Summary of Evidence 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. Accompanying me today is Phill Hunt, a Queenstown District Farmer and President of Federated Farmers of Otago. Mr Hunt has been a farmer in the District for 23 years and has been involved as a stakeholder representative in meetings with Queenstown Lakes staff in the preparation of the District Plan. My evidence is largely focused on economic considerations, however this evidence may elucidate some farmer specific questions which Mr Hunt will be better placed to answer.

Overall, the proposed District Plan seeks to find a balance between competing concerns, while appropriately recognising and providing for farming activity and rural land management in the Rural Zone. I agree that it is appropriate for the proposed plan to acknowledge that a significant proportion of the highly valued character derived from rural landscapes are maintained by, if not reliant, on primary production. I also agree it is relevant to consider how any reduction in the use of land for farming may impact the economic value derived from both tourism and primary production in the District.

As outlined in my evidence, land used for farming has reduced by 13% over a 24 year period across the Otago region overall. One of the factors driving this is the increasing demand for housing in the District. A consideration in relation to land use change is the relatively low Rate of Return from farming. While Rate of Return may not be the sole or primary metric of success or viability for Queenstown Lakes farmers, it is important to acknowledge that this is a consideration in respect to drivers for land use decisions.

A further and related point is that a low Rate of Return does not provide farmers with a large amount of capacity to take on increasing operational costs, particularly over time. This is a relevant concern given the impact district planning provisions can have on farm operating costs either directly, by requiring consents, or indirectly, by unnecessarily restricting farming practices, including through reverse sensitivity. I therefore agree with the acknowledgement within the Section 32 report for the Rural Zone Chapter that the administration of the current

District Plan and associated costs are appropriate considerations through this District Plan review.

However, I agree that a balance is required, with the proposed District Plan specifically providing for activities that are compatible with and complementary to primary production in the Rural Zone, while providing a consenting pathway for the effects of other activities to be considered. This is because the long term economic viability of farming in the District will also rely to an extent on the ability for primary producers to diversify into activities that are complementary to primary production in the Rural Zone. As farming contributes positively to the natural character amenity values of the District, farming activities should be allowed to derive some direct economic benefit from that natural character amenity, for instance through complementary rural tourism or food marketing opportunities.

Federated Farmers has significant concerns with three aspects of the proposed District Plan. The first concern relates to General Standard 21.5.7, which proposes that stock shall be prohibited from standing in the bed of, or on the margin of a water body. I agree that the issues relating to damaged riparian areas and the higher risk of diffuse and point source contamination of water from dairy farming need to be addressed. However, from a plan user perspective it is better to address any residual concerns through existing mechanisms in the form of the Otago Regional Plan: Water and the Sustainable Dairying: Water Accord.

Federated Farmers' second concern relates to the costs imposed on farmers through the provisions relating to indigenous vegetation and biodiversity. These concerns relate to the definition of indigenous vegetation in relation to coverage, and the proposed plan position that irrigation may be considered to adversely impact on indigenous vegetation.

As outlined in my evidence, irrigation plays a significant part in the viability of farming in the District, and if anything this reliance will increase as weather patterns become more volatile. It is also important from a plan user perspective that the obligations around indigenous vegetation and biodiversity are clear. I do not consider the Section 32 report appropriately acknowledges the important role of irrigation in respect to the economic sustainability of extensive pastoral farming. Nor do I consider the Section 32 report or the Section 42A report appropriately acknowledge the economic costs likely to arise from uncertainty around the resource management implications of irrigating, where this may be considered to adversely impact isolated examples of indigenous vegetation and biodiversity.

Federated Farmers' third concern relates to the proposals for addressing wilding tree spread. I appreciate the significant costs associated with the control of wilding pines, however as outlined in my evidence I consider there should be more weight given to the economic benefits derived from the planting of some species of wildings in the Rural Zone.