

# NZ PORK



## SUBMISSION ON Waitomo Proposed District Plan

20 December 2022

SUBMITTER: New Zealand Pork Industry Board

## 1. Introduction

The New Zealand Pork Industry Board (NZPork) welcomes the opportunity to submit on the Proposed Waitomo District Plan.

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

NZPork wishes to be heard in support of this submission and would be prepared to consider presenting our submission in a joint case with others making a similar submission at any hearing.

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## 2. About the New Zealand Pork Industry

NZ Pork is a statutory Board funded by producer levies. It actively promotes "100% New Zealand Pork" to support a sustainable and profitable future for New Zealand grown pork. The Board's statutory function is to act in the interests of pig farmers to help attain the best possible net on-going returns while farming sustainably into the future.

The New Zealand pig industry is a highly productive specialized livestock sector, well integrated within New Zealand's primary production economic base. It draws on both downstream and upstream inputs and economic activity from New Zealand's rural sector including feed inputs, equipment and animal health supply, transport, slaughterhouse facilities plus further processing. Currently New Zealand's pig farmers produce around 45,350 tonnes of pig meat per year for New Zealand consumers. This represents around 38% of pig meat consumed by the domestic market, with the other 62% provided by imported pig meat from a range of countries. Nationally there are less than 100 commercial pork producers, comprising a relatively small but significantly integrated sector of the New Zealand agricultural economy. In 2007 it was estimated by the NZ Institute of Economic Research that the total economic activity associated with domestically farmed pigs was approximately \$750 million per annum.

Pigs' needs are unique compared to other farmed animals. They need constant access to shelter, a balanced diet and regular care and supervision. To meet these needs, New Zealand's commercial pig farmers have adopted a range of farming methods. Many farmers prefer indoor farming because they believe it allows them to provide the best care for the modern animal by allowing them to carefully manage their environment. Approximately 55% of New Zealand's pigs are farmed in this way.

The other 45% of New Zealand's commercial breeding herd is farmed outdoors. Outdoor breeding (also called free-farmed pork) can only occur in a moderate climate with low rainfall and free-draining soil conditions. In New Zealand, these conditions are mostly found in Canterbury. In most free-farmed systems, sows are farmed in groups in paddocks during

gestation with huts for shelter and shade. When sows farrow, they are provided with individual, dry and draught-free huts with straw for warmth. A variety of housing systems are then used to house pigs after weaning, including indoor barns or open-air sheds.

New Zealand pork producers are facing several economic, social and environmental challenges in order to remain viable. The contribution of imported pork to New Zealand's total pork consumption has increased significantly in recent years, placing further demands on producers who have responded by developing increasingly efficient systems. Currently, nearly all pork produced in New Zealand is consumed locally and makes up less than 40% of the domestic market supply.

The New Zealand pork industry is dedicated to producing environmentally sustainable pork. NZPork is proactive in supporting farmers to reduce environmental impacts through investing producer funds into research, innovation and technologies in a range of environmental areas including nutrient management, greenhouse gas emission reductions and by-product reuse. Pig farmers in New Zealand have a firm grasp of environmental issues and demonstrate a high level of innovation and environmental stewardship. The New Zealand pork industry has committed significant time and resource to Sustainable Farming Fund projects centered on environmental initiatives, including development and implementation of Environmental Guidelines (attached) and Nutrient Management Guidelines. However, profit margins for the industry remain tight and dialogue with farmers has indicated that compliance costs and uncertainty into the future are key issues.

### 3. Summary of submission

An overview of key points of feedback to the proposed plan change is provided below. Specific submission points are detailed in Section 4.

#### **3.1 Definitions for Intensive Primary Production Activities.**

The proposed plan defines both Intensive indoor primary production (as per the National Planning Standards definition) and Extensive pig farming. NZ Pork supports the distinction between intensive and extensive pig farming, as there is a difference in activity and effect from intensive indoor and outdoor pig farming activity and it is helpful in plans to define and provide provisions for both.

However, this approach does create a gap for intensive outdoor primary production activities, which can produce similar amenity effects to intensive indoor activities.

We propose a definition for Intensive primary production which covers both indoor and outdoor activities. This approach defines intensive indoor primary production, intensive outdoor primary production (under the umbrella term of Intensive primary production) and extensive pig farming activities.

This developing approach has largely been driven out of Canterbury and Otago which are the key pork production regions of New Zealand; where a variety of intensive primary

production activity occurs, along with extensive pig farming. Reflective of New Zealand pig farming practice, the structure developing in planning frameworks nests as follows:

<b>Primary Production</b>	<b>Intensive Primary Production</b>	<b>Intensive Indoor Primary Production</b>
		<b>Intensive Outdoor Primary Production (Pig Farming)</b>
	<b>Extensive Pig Farming</b>	

### Primary Production

Primary Production is defined in the National Planning Standards 2019.

*Primary Production means:*

- (a) any aquaculture, agricultural, pastoral, horticultural, mining, quarrying or forestry activities; and*
- (b) includes initial processing, as an ancillary activity, of commodities that result from the listed activities in a);*
- (c) includes any land and buildings used for the production of the commodities from a) and used for the initial processing of the commodities in b); but*
- (d) excludes further processing of those commodities into a different product.*

### Intensive Primary Production

Intensive Primary Production is then a subset of Primary Production to provide a nesting pathway to Intensive Indoor and Intensive Outdoor activity.

*Intensive Primary Production means:*

*any activity defined as intensive indoor primary production or intensive outdoor primary production (pig farming)*

### Intensive Indoor Primary Production

Intensive Indoor Primary Production is defined in the National Planning Standards 2019.

*Intensive Indoor Primary Production means:*

*primary production activities that principally occur within buildings and involve growing fungi or keeping or rearing livestock (excluding calf-rearing for three months in any calendar year) or poultry.*

### Intensive Outdoor Primary Production (Pig Farming)

Intensive Outdoor Primary Production is not defined in the National Planning Standards 2019 and for pig farming it is important to do so.

Intensive Outdoor Primary Production (Pig Farming) relies on the outdoor environment to assist with the growth and husbandry of animals along with buildings and enclosures to contain and house animals. However, this Primary Production activity does not *principally occur within buildings* and falls outside of the definition of Intensive Indoor Primary Production.

Intensive Outdoor Primary Production (Pig Farming) is an intensive activity. It would typically rely on regular feed source for the livestock substantially provided from off-site sources rather than the productive capacity of the land to produce grass and animal food crops. Another characteristic of Intensive Outdoor Primary Production, largely resulting from the import of feed and stock density, can be difficulty in maintaining pasture and groundcover.

Where pasture and groundcover can be maintained the pig farming activity effects of dust and odour are not an issue.

### **Extensive Pig Farming**

Extensive Pig Farming is livestock farming as it is traditionally recognised, outdoors, grass and feed crop fed animals, some imported feed, animal shelters and stocking rates that maintain ground cover.

In pig farming, the shelters are often mobile to assist with maintaining pasture and groundcover, and as part of rotational grazing.

From a land use perspective, the effects are the same as that of other extensive livestock farming (sheep, beef, lamb, dairy, deer). The activity is appropriately provided for as a Permitted Activity in the General Rural Zone.

Providing a definition around this activity can assist plan interpretation and administration:

*Extensive Pig Farming means:*

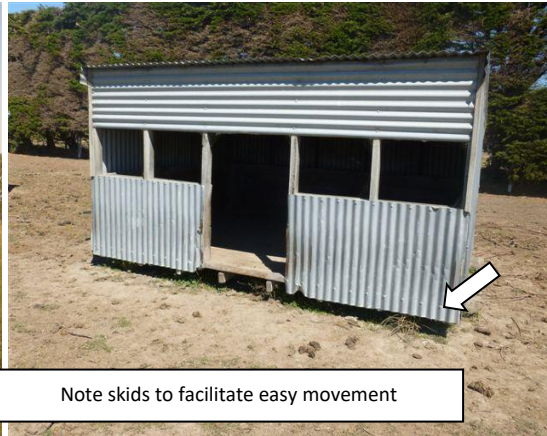
*the keeping or rearing of pigs outdoors on land at a stock density which ensures vegetation cover is maintained and in accordance with any relevant industry codes of practice, and where no fixed buildings are used for the continuous housing of animals.*

### **3.2 Mobile pig shelters**

NZ Pork is concerned that Mobile Pig Shelters (being partially or fully-roofed) would fall within the definition of building and structure. The plan should provide relief from the rules for buildings and Structures as they might apply to mobile pig shelters. These shelters are a critical part of the pig farming system and can be of a variety of forms as shown below.

**Dry Sow Group Accommodation Recommended Practice**

Dry sow housing is generally designed to accommodate groups of breeding animals. These come in a variety of forms as shown in the illustrations below. Note trees for shelter and the huts are facing away from the predominant wind direction.



**Photo 1-6: Variations in dry sow housing designs**



**Photo 7: Interior of a dry sow house with wooden floor**

### Weaner Accommodation

The younger the pig, the more vulnerable they are and the more critical are their accommodation needs. They must be kept in a clean, warm, dry, draught free environment subject to minimal variations in temperature. Straw based systems work well.



**Photos 8 and 9: Weaner Accommodation**

Photos 8 and 9 demonstrate an example of suitable weaner accommodation: Photo 8 (left) shows separate straw bale draught free sleeping area, under a 'kennel' roof for newly weaned pigs. Also note ventilation flap at back and drinkers in left foreground. Photo 9 (right) shows weaner pigs a few weeks later with the straw bale sleeping area broken down but the 'kennel' roof retained in the sleeping area.

Other considerations:



- Where possible pigs should be kept in stable groups of familiar animals though out the growing period.
- The use of moveable weaner 'boxes' constructed of plywood is one approach to provide quality accommodation. Weaner boxes are generally constructed with a low roof and are well insulated.
- Ensure water supply is sited outside of the sleeping area to prevent flooding of the bedding.



**Photo 10: An example of a low roofed box type accommodation suitable for weaners**

### Grower accommodation

As pigs grow, they become more tolerant of changes in the environment and accommodation requirements are less rigorous. However, it is essential they have a warm dry, draught-free sleeping area large enough to accommodate all the pigs in a paddock together.



**Photo 10: Accommodation suitable for free range growers**

**Photo 11: Example of access for free range growing pigs to fodder beet crops from a shelter**

A popular design is a 'kennel' area constructed in a general-purpose building. A false roof or lid is positioned over the pigs sleeping area to create a warm, dry and draught free environment.

### **3.3 Earthworks and Biosecurity-related activity**

The viability of the New Zealand pork industry is dependent on the benefits conveyed upon it from the absence of many viral pathogens which are common in much of the rest of the world. Any biosecurity incursions within the industry must be able to be managed quickly and efficiently to contain spread. Not all biosecurity incursions would constitute a biosecurity emergency that would trigger provisions in the RMA or the Biosecurity Act to override consenting requirements. The intersect with the District Plan may well be in a response that requires burial of animal carcasses. The Regional Plan is in place to manage discharges from such activities but constraints on earthwork activity (volume and area) may inhibit a timely, efficient, and effective response.

NZPork seeks a definition of Ancillary Rural Earthworks to include the burying of material infected by unwanted organisms as declared by the Ministry for Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993'. This would allow farmers to undertake earthworks related to burying material in the event of a biosecurity incident as a permitted activity.

## 4. Specific submissions on the Proposed Waitomo District Plan

Provision to which our submission relates	Our position on this provision is:	The reasons for our submission are:	The decision we want Council to make
<b>Definitions</b>			
Building	Support in part	<p>Support the definition of Building as per the National Planning Standards Definition.</p> <p>Mobile pig shelters, being either partially or fully roofed, would fall under the definition of a building. However, controls on building coverage, footprint and platforms within the plan should not be applicable to mobile pig shelters.</p> <p>The plan should provide relief from the rules referencing buildings for mobile pig shelters.</p>	Provide relief from the rules relating to buildings for mobile pig shelters throughout the plan.
Earthworks	Support in part	<p>Support the definition of Earthworks as per the National Planning Standards Definition.</p> <p>Recommend the inclusion of a definition and associated rule structure to cover <b><u>Ancillary Rural Earthworks</u></b>.</p> <p>This definition should include the burying of material infected by unwanted organisms as</p>	<p>Add definition as follows:</p> <p>Means any earthworks or disturbance of soil associated with:</p> <p>(a) Crop cultivation and associated land preparation (including establishment of sediment and erosion control measures);</p>

		<p>declared by the Ministry for Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993'. Any biosecurity incursions within the pork industry must be able to be managed quickly and efficiently to contain spread. The intersect with the District Plan may be in a response that requires burial of animal carcasses. Constraints on earthwork activity (volume and area) may inhibit a timely, efficient and effective response.</p> <p>The need for this regulatory rule structure has been accepted in a number of operative and proposed planning documents around NZ. Refer for example Auckland Unitary Plan or Proposed Waikato District Plan – Appeals Version (8 Aug 2022).</p>	<p>(b) Harvesting of agricultural and horticultural crops (farming);</p> <p>(c) Maintenance and construction of facilities associated with farming activities, including, but not limited to, farm tracks, roads and landings, stock races, silage pits, offal pits, farm drains, farm effluent ponds, feeding pads, fertiliser storage pads, airstrips, helipads, post holes, fencing, drilling bores, stock water pipes, water tanks and troughs, the maintenance of on-farm land drainage networks, and erosion and sediment control measures; and</p> <p>(d) Burying of material infected by unwanted organisms as declared by the Ministry for Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993.</p>
Intensive Indoor Primary Production	Support in part	<p>Support the use of the National Planning Standards definition for Intensive Indoor Primary Production. However, the plan does not account for intensive outdoor primary production activities, which can produce similar effects to indoor activities.</p> <p>We recommend the development of a definition structure to accommodate both indoor and outdoor intensive primary production activities under the umbrella of 'intensive primary production'.</p>	<p>Include additional definitions to cover the typical range of primary production activities that can be deemed intensive:</p> <p><b><u>Intensive Primary Production</u></b> means any activity defined as intensive indoor primary production or intensive outdoor primary production.</p> <p><b><u>Intensive Indoor Primary Production</u></b> (as per National Planning Standards definition) means primary production activities that principally occur within buildings and involve growing fungi, or keeping or rearing livestock (excluding calf-rearing for a specified time period) or poultry.</p>

			<p><b><u>Intensive Outdoor Primary Production</u></b> means any <u>primary production activities involving the keeping or rearing of livestock (excluding calf-rearing for a specified time period) that principally occurs outdoors which, by the nature of the activity, precludes the maintenance of pasture or ground cover. Excludes <b>Extensive Pig Farming</b>.</u></p>
Noise sensitive activity/sensitive activity	Oppose in part	<p>Oppose the exclusion of camp grounds, community facilities, educational facilities and hospitals from the definition of a sensitive activities.</p> <p>These are activities which could give rise to reverse sensitivity effects when established in close proximity to primary production activities.</p>	<p>Amend definition as follows:</p> <p><b>Noise sensitive activity</b> means residential units and minor residential units, boarding houses, co-housing developments, compact housing developments, retirement villages, visitor accommodation, papakāinga units and papakāinga housing developments, residential based visitor accommodation, managed care facilities and other buildings used for residential activities but excludes:</p> <p>(a) <del>Camping grounds.</del>  <del>(a)</del> <u>(a)</u> Tiny houses and tiny house developments.  <del>(e)</del> <u>(b)</u> Marae complex.  <del>(d)</del> <u>(c)</u> Community facilities.  <del>(e)</del> <u>(d)</u> Educational facilities.  <del>(f)</del> <u>(e)</u> Hospitals.</p>
Outdoor (extensive) pig farming	Support in part	<p>Support defining extensive pig farming separately from intensive primary production, on the basis that the nature and scale of the activity will produce different effects to intensive activities.</p> <p>Support the use of groundcover maintenance as the qualifier for determining whether an activity</p>	<p>Amend definition as follows:</p> <p>means an area of a site or holding where all pigs and piglets are contained within a paddock(s) with groundcover maintained <u>in accordance with the relevant industry agreed good management practice guidelines.</u></p>

		<p>is extensive. Stocking rates that allow for the maintenance of groundcover will be low enough to cause minimal effects beyond that expected with any other type of pastoral/grazing activity.</p> <p>However, we suggest including a reference to industry approved good management practice standards for groundcover within the definition, as this will give clarity to how much groundcover is considered appropriate on a pig farm to meet this definition.</p> <p>Groundcover can vary between paddocks depending on the group of pigs housed and can vary between seasons. The industry agreed GMPs address these issues.</p>	
Primary production	Support in full	Support the National Planning Standards definition for primary production.	Retain as proposed. f
<b>Strategic Direction</b>			
Rural Environments		<p>Create a new strategic direction, objectives and policies to outline the key strategic and significant resource management issues for the rural environments within the district.</p> <p>Not acknowledging or defining the key issues for the zone within the strategic objectives downplays the importance of the rural environments to the district.</p>	<p>Create a new strategic direction, objectives and policies to outline the key strategic and significant resource management issues for the rural environments within the district.</p> <p>Social and Economic Wellbeing:</p> <ul style="list-style-type: none"> <li>• Waitomos rural environment contributes positively to the districts economic and social wellbeing.</li> </ul> <p>Productive capacity</p>

			<ul style="list-style-type: none"> <li>Rural land remains available for primary production activities and productive capacity is protected.</li> </ul> <p>Reverse Sensitivity</p> <ul style="list-style-type: none"> <li>Reverse sensitivity effects are managed so as not to constraint primary production activities</li> </ul> <p>Rural lifestyle</p> <ul style="list-style-type: none"> <li>Opportunities for rural lifestyle subdivision and development are only provided in parts of the rural environment where they do not conflict with enabling primary production and protecting the productive potential of land.</li> </ul>
<b>Subdivision</b>			
<b>Objectives</b>			
SUB-O7	Support in full	Support subdivision that ensures the retention of productive potential of the rural land resource in the district.	Retain as proposed.
SUB-O11	Support in part	<p>Support the requirement to identify a building platform in a location which minimises reverse sensitivity effects when the new allotment is close to the boundary of a rural production zone, indicative rural production area or an established site of intensive indoor primary production.</p> <p>Reverse sensitivity issues are a potential constraint on primary production activities, including pig farming. While pig farmers make every endeavour to minimise adverse effects from their operations, there will sometimes be</p>	<p>Change wording as follows:</p> <p>SUB-O11. Ensure new allotments created close to the boundary of a rural production zone, indicative rural production area or an established site of <del>intensive indoor primary production</del> <u>Intensive Primary Production</u> identify a building platform(s) in a location which <del>minimises</del> <u>avoids or mitigates</u> reverse sensitivity effects.</p>

		<p>unavoidable odours/dust/noise that arise from their operations (as there would be with any livestock operation) and this should be anticipated and accepted within a productive rural environment.</p> <p>However, people moving into or adjacent to rural areas may have unrealistic expectations of amenity in these areas.</p> <p>Addressing this via controls on the location of new residential buildings in these areas is supported.</p> <p>Suggest a change of wording to Intensive Primary Production activities, to accommodate both intensive indoor and intensive outdoor activities, which may produce similar effects</p>	
<b>Policies</b>			
SUB-P3	Support in part	<p>Support policy to discourage subdivision that would constrain the operation of established intensive indoor primary production activities, however suggest wording change to align with the intent of the National Policy Statement for Highly Productive Land</p> <p>Suggest a change of wording to Intensive Primary Production activities, to accommodate both intensive indoor and intensive outdoor activities, which may produce similar effects.</p>	<p>Change wording as follows:</p> <p>SUB-P3. <del>Discourage</del> <u>Avoid or otherwise mitigate</u> subdivision that would:</p> <p>9. Constrain the operation of established <del>intensive indoor primary production</del> <u>Intensive Primary Production</u> activities; and/or</p>
SUB-P10	Support in full	<p>Support policy to ensure subdivision does not compromise the predominant function, character and amenity of the General Rural</p>	<p>Change wording as follows:</p> <p>SUB-P10:</p>



		<p>Zone, including minimising the use of highly productive soils for activities other than primary production and minimising the potential for subdivision which would result in reverse sensitivity effects.</p> <p>Suggest change in wording to reflect the intent of the National Policy Statement for Highly Productive Land on this issue.</p>	<p>2. <del>Minimising</del> <u>Protecting</u> the use of highly productive <u>land soils</u> for <del>activities other than</del> primary production <u>activities</u>.</p>
<b>Rules</b>			
SUB-R1	Support in part/oppose in part	<p>Support R-DIS status to create new allotments in the General Rural Zone.</p> <p>Oppose minimum net site area of 2 hectares for the General Rural Zone. Lot sizes of 2 hectares do not support primary production, other than hobby/lifestyle farming. Small lot sizes will contribute to the fragmentation and loss of food-producing potential of productive rural land, and result in increased opportunities for reverse sensitivity where small-lot subdivision occurs in close proximity to primary production activities.</p> <p>A 2ha lot size does not support SUB-O7 or P-10.</p> <p>Support matters of discretion including reverse sensitivity effects but extend to clarify this is a consideration of effects on <u>lawfully established and permitted primary production activities</u>.</p>	<p>Amend minimum lot size to 40ha.</p> <p>Amend matters of discretion:</p> <p>Reverse sensitivity effects <u>on lawfully established and permitted primary production activities</u>.</p>

		Support DIS activity status if compliance not achieved.	
SUB-R2	Support in full	Support R-DIS status for boundary adjustments for the general rural zone. Support reverse sensitivity effects as a matter of discretion.  Support DIS activity status if compliance not achieved.	Retain as proposed
SUB-R9	Support in part	Support DIS activity status for subdivision within 500m of an established site of intensive indoor primary production. However, effects from intensive primary production activities can arise from areas other than buildings housing animals. Suggest an amendment to the condition to reflect this.  Suggest changing definition to intensive primary production to accommodate both intensive indoor and intensive outdoor primary production activities.	3. In the general rural zone, the new allotment is created within 500 m of <del>the perimeter of the external walls of the closest building housing animals</del> <u>any hard stand areas, treatment systems, buildings housing animals and any other structures related to an intensive primary production activity;</u> <del>on an established site of intensive indoor primary production.</del>
SUB-Table 2 – Performance Standards	Support in part	Plan interpretation would be improved by naming standards SUB-S##, to clearly differentiate between standards and rules.	Amend numbering of standards in SUB Table 2 to clearly differentiate between standards and rules.
SUB-R19	Support in full	Support the requirement for identification of a suitable location for a building platform for each allotment.	Retain as proposed.
<b>General District Wide Matters</b>			
<b>Earthworks</b>			

EW-R5 Earthworks for any other purpose	Support in full	Support PER activity status for earthworks for any other purpose, subject to compliance with performance standards. Support RDIS activity status for non-compliant activities.	Retain rule as proposed.
EW – Table 2 – Performance Standards	Support in part	Plan interpretation would be improved by naming standards EW-S##, to clearly differentiate between standards and rules.	Amend numbering of standards in EW- Table 2 to clearly differentiate between standards and rules.
EW-R6: Performance standards	Support in full	Support exemption of farming activities from the performance standard requirements, however suggest aligning this with the proposed definition of ancillary rural earthworks, to provide for a broader range of farming earthwork activities that could reasonably be expected as part of primary production activity.  Support earthworks standards in the general rural zone.	Amend standard as follows:  <b>EW R6 Volume of Earthworks</b>  1. This rule does not apply to earthworks incidental to an approved resource consent; and 2. This rule does not apply to the cultivation of land associated with the growing of crops where this activity is located at least 5 m from the edge of any water body (see NATC-R3); and 3. This rule does not apply to plantation forestry, or to <del>the construction and maintenance of farm silage pits and existing drains or to the maintenance and upgrading of farm tracks, ancillary rural earthworks,</del> however these activities must comply with the provisions of EW-R1.
<b>Light</b>			
Light Table 2 – Performance Standards	Support in part	Support exemption of lights of vehicles from the performance standards, however for clarity recommend specific note of agricultural machinery as included in this exemption.	Amend wording as follows:  7. The following activities are exempt from the provisions of this rule: (i) Streetlights, navigation aids and traffic signals; and

			<p>(ii) Lights of vehicles (including farm vehicles and mobile farm machinery), trains and aircraft; and</p> <p>(iii) Lighting associated with temporary events and commercial filming; and</p> <p>(iv) Temporary lighting for the purpose of emergency management activities, temporary military training activities and emergency response.</p>
<b>Noise</b>			
<b>Objectives</b>			
NOISE – O1	Support in full	<p>Support enabling activities to generate noise that is compatible with the role, function and predominant character of the zone.</p> <p>Primary production activities will generate a range of noises from different sources throughout the year. This should be anticipated and provided for within a working rural environment.</p>	Retain as proposed
NOISE – O3	Support in full	Support new noise sensitive activities being designed and/or located to minimise conflict and reverse sensitivity effects.	Retain as proposed.
<b>Policies</b>			
NOISE-P1	Support in full	<p>Support noise effects generated by an activity being of a type, scale and level that supports the character and amenity outcomes anticipated in the relevant zone.</p> <p>Support the description of the general rural zone as a working and living environment, and that noise from rural activities is an accepted part these environments, including higher noise</p>	Retain as proposed

		levels at night or in the morning during different times of the year.	
<b>Rules</b>			
NOISE – R1	Support in full	Support emission of noise as a permitted activity subject to compliance with performance standards.  Support RDIS activity status for non-compliant activities.	Retain as proposed.
NOISE- Table 2 – Performance Standards	Support in part	Plan interpretation would be improved by naming standards NOISE-S##, to clearly differentiate between standards and rules.	Amend numbering of standards in NOISE Table 2 to clearly differentiate between standards and rules.
<b>Part 3 – Area Specific Matters</b>			
<b>Rural</b>			
<b>General Rural Zone (GRUZ)</b>			
Overview	Support in part	The overview states that the zone supports a range of activities, including farming. The term farming is not defined in the plan and is ambiguous in terms of what this definition encompasses (e.g., is intensive indoor primary production considered a farming activity?). The National Planning Standards provide a zone description for the GRUZ which references primary production and intensive indoor primary production – both of which are defined in this plan. For consistency and ease of plan interpretation, the overview should adopt the National Planning Standards zone description and reference terms defined in the plan.  The overview describes over 500 farming properties in the district, and more than 50% of	Amend overview as follows:  <u>The General Rural Zone is primarily a pastoral working environment, used predominantly for primary production activities, including intensive indoor primary production. The zone may also be used for a range of activities that support primary production activities, including associated rural industry, and other activities that require a rural location, including tourism and recreation.</u>  <u>The General Rural Zone is recognised for its food production values and the contribution of activities within the zone to domestic and international food security.</u>

		<p>the land area used for farming. Farming is clearly the primary land use activity in the district, yet there is no distinction between this and the other activities noted (forestry, tourism and recreation) in terms of their importance within the zone.</p> <p>As the General Rural Zone is the location in which most primary production activity in the district is based, the overview should reference the food production value of the zone, and the contribution of the zone to domestic and international food security.</p> <p>Support the description of the character of the rural zone as including a predominantly working landscape with farming activities and buildings, woolsheds and stockyards, and the characteristic rural noises and odours of farming, including the widespread use of machinery supporting the principal productive land uses.</p>	<p><del>The rural areas of the district are primarily a pastoral, working environment that are reliant on the land and soil resource to support a range of activities including farming, forestry, tourism and recreation</del></p> <p>The zone is also reliant on people and communities to function effectively...</p>
<b>Objectives</b>			
GRUZ-05	Support in full	Support objective to ensure that rural character and amenity is maintained and where possible, enhanced, on the understanding that rural character includes the sights, sounds and smells associated with rural production activities, as defined in the zone overview.	Retain as proposed.

GRUZ-O6	Support in part	Support objective to maintain the capacity of rural areas and rural resources to support agricultural, pastoral and horticultural activities, however this should extend to intensive primary production as a supported land use within the zone.	Amend objective as follows:  Maintain the capacity of rural areas and rural resources to support agricultural, pastoral and horticultural activities, <u>intensive primary production activities</u> and lawfully established rural-based activities.
GRUZ-O7	Oppose in part	Intensive indoor primary production is a legitimate primary production activity, which requires a rural location in which to operate. The activity should not be constrained anywhere within the zone because of potential effects that are consistent with the defined character of the zone (odour, dust, noise etc.)	Amend objective as follows:  In locations where effects can be appropriately managed, provide for rural-based industry <del>and intensive indoor primary production.</del>
GRUZ-O8	Support in full	Support objective to only enable non-farming activities that are ancillary to a farming activity or have a functional and operational need to locate in the GRZ.	Retain as proposed.
GRUZ- O10	Support in full	Support protection of existing lawfully established activities from reverse sensitivity effects but extend to clarify this is a consideration of effects on <u>lawfully established and permitted primary production activities</u> .	Amend wording as follows:  Protect existing lawfully established and permitted primary production activities from reverse sensitivity effects.
GRUZ-O15	Support in full	Support objective to avoid subdivision that allows the establishment of incompatible adjacent land uses that could result in reverse sensitivity effects on rural activities or existing lawfully established rural industries.	Retain as proposed
<b>Policies</b>			

GRUZ-P1	Support in full	Support policy to manage land use activities and development in order to maintain rural character and amenity.	Retain as proposed
GRUZ-P3	Support in part	<p>Support policy to maintain rural character, amenity and safety and to minimise reverse sensitivity effects.</p> <p>Support appropriate setbacks for residential activities from an established site of intensive indoor primary production, however reverse sensitivity effects can arise from a range of sensitivity activities, which should be recognised in the policy.</p> <p>Support recognition that farming activities are an established and accepted component of the rural environment and may generate noise, odour, dust and visual effects.</p>	<p>Amend policy as follows:</p> <p>Ensure that rural character, amenity and safety is maintained and that reverse sensitivity effects are <del>minimised</del> <u>avoided, mitigated or remedied</u> by:</p> <p>3. Ensuring that buildings housing <del>residential-sensitive</del> activities are appropriately setback from the boundary of a rural production zone or an established site of intensive indoor primary production; and</p>
GRUZ-P6	Support in full	Support policy to manage activities that are not primary production activities within the zone.	Retain as proposed.
GRUZ-P7	Oppose	<p>Oppose enabling tourism activities within the GRUZ. Tourism activities are sensitive activities which have the potential to generate reverse sensitivity effects on established primary production activities.</p> <p>This policy also conflicts with GRUZ-P6 and GRUZ-O8 .</p> <p>Tourism activities should be provided for subject to an assessment of the functional and operational need of the activity to locate in the</p>	<p>Amend policy as follows:</p> <p><b>GRUZ-P7.</b> Tourism activities are <del>enabled</del> <u>provided for</u> in the general rural zone where: 1. <u>There is an functional and operational need for the activity to locate within the GRUZ.</u></p> <p><u>1.2</u> The operation of lawfully established primary production activities are not compromised by the introduction or intensification of a tourism activity; and...</p>



		zone, plus any adverse impacts to primary industry.	
GRUZ-P8	Oppose in part	<p>The adverse effects of intensive indoor primary production activities, including those listed in this policy, are consistent with the characteristics of the zone defined in the plan.</p> <p>The impact of intensive indoor primary production activities within the zone does not come from the effects generated, but the impact of those effects on surrounding sensitive activities.</p> <p>We would support a policy addressing this potential affect.</p>	<p>Amend policy as follows:</p> <p>GRUZ-P8.  <del>Ensure intensive indoor primary production operates in a way that manages adverse effects including</del>  <u>Ensure new intensive indoor primary production activities are separated from existing sensitive activities to prevent adverse effects from</u>  noise, glare, traffic generation, visual amenity, rural character, landscape effects and odour</p>
GRUZ-P9	Support in part	<p>Support policy to address visitor accommodation. Given that visitor accommodation is a sensitive activity, and that the establishment of new visitor accommodation could restrict the operation of established primary production activities, the site specific issues noted in the policy should include reverse sensitivity effects.</p>	<p>Amend policy as follows:</p> <p>GRUZ-P9. Where visitor accommodation is proposed, its scale and design must enhance rural amenity, quality and character, and ensure site specific issues including servicing <del>and</del>, transport <u>and reverse sensitivity</u> related effects are appropriately addressed.</p>
GRUZ-P10.	Support in part	<p>Support policy to address residential visitor-based accommodation. Given that visitor accommodation is a sensitive activity, and that the establishment of new visitor accommodation could restrict the operation of established primary production activities, the adverse effects noted in the policy should include reverse sensitivity effects.</p>	<p>Amend policy as follows:</p> <p>GRUZ-P10: Minimise the potential for residential based visitor accommodation to generate adverse traffic <del>and</del>, noise <u>and reverse sensitivity</u> effects on adjoining properties by restricting maximum occupancy.</p>

GRUZ-P16	Support in full	Support policy to manage the location of noise sensitive activities on sites surrounding intensive indoor primary production activities	Retain as proposed.
<b>Rules</b>			
GRUZ-R1	Support in full	Support agricultural, pastoral and horticultural activities as permitted, subject to standards	Retain as proposed.
GRUZ-R2	Support in full	Support residential units, minor residential units and farm worker residential units as permitted, subject to standards.	Retain as proposed.
GRUZ-R6	Support in full	Support outdoor (extensive) pig farming as permitted, subject to standards.  Outdoor pig farming, where groundcover is maintained according to industry good management practice, should not produce effects beyond those expected from any other pastoral farming activity.	Retain as proposed.
GRUZ-R7	Oppose	Oppose visitor accommodation and residential visitor accommodation as a permitted activity in the GRZ.  Visitor accommodation is defined as a sensitive activity in the plan, and therefore has the potential to be incompatible with primary production activities within the zone. This potential should be fully addressed via a resource consent process to protect existing primary production activities from reverse sensitivity effects.	Amend activity status to Restricted Discretionary and include setbacks for reverse sensitivity in the matters for discretion.
GRUZ-19	Oppose	Oppose PER status for tourism facilities and retail facilities. These are sensitive activities	Amend rule as follows:

		<p>which have the potential to generate reverse sensitivity effects for established primary production activities within the zone.</p> <p>A PER status is not consistent with GRUZ-O8 and GRUZ-P6 which seek to control the establishment of activities that are not primary production activities within the zone.</p> <p>The necessity of the operation to establish in the GRUZ and the potential effects of the activity should be dealt with via a consenting pathway.</p>	<p><b>GRUZ-R19 Tourism facilities and retail activities</b></p> <p><b>Activity Status: <del>PER</del>-RDIS</b></p> <p><u>Matters over which discretion is restricted:</u></p> <ul style="list-style-type: none"> <li>(a) <u>The functional and operational need of the activity to operate in the proposed location.</u></li> <li>(b) <u>The number of facilities or activities per land holding</u></li> <li>(c) <u>The hours of operation</u></li> <li>(d) <u>Vehicle movements</u></li> <li>(e) <u>Potential for reverse sensitivity effects and proposed methods for avoiding, mitigating or remedying effects.</u></li> </ul>
GRUZ-R23 and GRUZ R24	Support in full	Support RDIS activity status for these activities. Support matters of discretion to include potential reverse sensitivity effects on any adjoining rural activities.	Retain as proposed
GRUZ-R25	Support in full	Support DIS activity status for educational facilities and community facilities.	Retain as proposed.
GRUZ – R30	Support in full	Support DIS activity status for camping grounds. These activities have the potential to be sensitive to primary production activities, and to use productive land resource unnecessarily. These	Retain as proposed

		matters should be assessed via a consenting pathway.	
GRUZ-R31	Oppose	<p>Oppose DIS activity status for intensive indoor primary production.</p> <p>Intensive indoor primary production (and intensive outdoor primary production) are legitimate rural production activities that have a functional and locational need to operate within the general rural zone. This is recognised in the National Planning Standards, which specifically references intensive indoor primary production in the GRUZ zone description.</p> <p>There is no other zone within the district plan to reasonably accommodate these activities.</p> <p>The S32 report for the GRUZ states that “The intensive farming of animals (usually within buildings) may create adverse effects such as odour, dust emissions, noise and effects on water quality from effluent disposal”.</p> <p>The GRUZ Overview and GRUZ-P3 specifically reference odour, dust and noise as part of the character of the GRUZ.</p> <p>The effects on water quality from farm effluent discharges are covered by the Waikato Regional Plan and their control is not a function of the Waitomo DC.</p>	<p>Amend rule as follows:</p> <ol style="list-style-type: none"> <li>1. <b>Activity status:</b> Restricted discretionary</li> </ol> <p><b>Where:</b></p> <ol style="list-style-type: none"> <li>a. All hard stand areas, treatment systems, buildings housing animals and any other structures related to an intensive primary production activity are setback 500m from the notional boundary of any sensitive activity on a site under separate ownership</li> </ol> <p><b>Matters of discretion are restricted to:</b></p> <ol style="list-style-type: none"> <li>b. Odour, noise and dust effects</li> <li>c. Impacts on the transport network</li> <li>d. Scale, design and site layout</li> <li>e. Impacts on visual amenity</li> </ol> <ol style="list-style-type: none"> <li>2. <b>Activity status when compliance not achieved:</b> Discretionary.</li> </ol>

		<p>It does not follow that a discretionary activity status is an appropriate planning response for this activity within the GRUZ.</p> <p>A R-DIS activity status, subject to setbacks to sensitive activities, and with the matters of discretion limited to those which could impact on the character and amenity values of the zone beyond those which should be usually anticipated, would better reflect the locational and functional need of this activity while managing effects.</p> <p>Amend wording to intensive primary production to accommodate intensive outdoor primary production activities.</p>	
GRUZ – Table 2 – Performance Standards	Support in part	Plan interpretation would be improved by naming standards GRUZ-S##, to clearly differentiate between standards and rules.	Amend numbering of standards in GRUZ Table 2 to clearly differentiate between standards and rules.
GRUZ-R37	Support in full	Support standard for minimum setbacks from road boundaries.	Retain as proposed
GRUZ-R38	Support in full	Support standard for minimum setbacks from internal boundaries	Retain as proposed
GRUZ-R39	Support in full	Support standard for height and height in relation to boundary	Retain as proposed
GRUZ-41	Support in full	Support standard for setbacks for specified farm buildings and new buildings housing a residential activity	Retain as proposed

<p>GRUZ-42</p>	<p>Support in part</p>	<p>Support standard for a minimum setback of 500m from intensive indoor primary production. However, reverse sensitivity effects can arise from activities other than residential activities. Adverse effects can be generated from areas other than structures housing animals. The standard should be amended to reflect this. Support matters over which discretion is restricted.</p> <p>Amend definition to intensive primary production, to accommodate intensive outdoor primary production activities.</p>	<p>Amend standard as follows:</p> <ol style="list-style-type: none"> <li>2. As measured from the perimeter <u>of all hard stand areas, treatment systems, buildings housing animals and any other structures related to an intensive primary production activity of the external walls of the structures housing animals on an established site of intensive indoor primary production</u>, the minimum setback for a building housing a <del>residential</del> <u>sensitive</u> activity must be 500 m</li> </ol>
<p>GRUZ-R43</p>	<p>Oppose</p>	<p>This standard relates to the storage and spreading of non-hazardous solid or liquid waste, yet there is no rule in the plan to which the standard applies, so it is unclear how this activity will be managed within the zone.</p> <p>Oppose controls on storage and spreading of solid or liquid waste, which includes animal effluent, as this is a duplication of controls provided by the Waikato Regional Plan, which provides odour controls relating to the storage and spreading of effluent. A duplication with regional rules results in increased cost and complexity for farmers and council staff with no additional benefit to the district</p>	<p>Delete standard.</p>

GRUZ-R45	Support in part	<p>Support the provision of residential units for farm workers, however more than one unit should not trigger a DIS activity status.</p> <p>Pig farming requires more frequent and active management of the animals to accommodate their needs. They have specific dietary and welfare requirements which necessitate farm workers being available 24 hours a day, 7 days a week. Farm worker accommodation is therefore a vital component of a commercial pig farm and may require more than one worker and their family to be housed on site.</p>	<p>Amend activity status where compliance not achieved for farm working units to RDIS.</p> <p>Restrict matters of discretion to:</p> <ul style="list-style-type: none"> <li>• Visual effects</li> <li>• Effects on rural character and amenity</li> <li>• Potential reverse sensitivity effects on any adjoining rural activities</li> <li>• Parking, manoeuvring and access.</li> </ul>
GRUZ-R46	Oppose	<p>Oppose maximum building coverage for sites greater than 1ha of 3%. The GRUZ is a productive working environment. Buildings associated with primary production activities should not have a size limit imposed within the GRUZ that could curtail their efficient and effective operation. Exempting buildings associated with primary production activities would not impact significantly on the density and built form of the zone, given the large size of the zone, and with almost half of all farm operations being over 200ha.</p> <p>Mobile pig shelters would be covered under the definition of a building, however should be</p>	<p>Provide an exemption to the standard for buildings associated with primary production activities and for mobile pig shelters, as follows:</p> <p>2. For sites greater than one hectare the maximum amount of a site which can be covered by buildings is 3%.</p> <p><u>Excludes:</u></p> <ol style="list-style-type: none"> <li>a. <u>Buildings associated with primary production activities</u></li> <li>b. <u>Moveable pig shelters, including farrowing huts 30m<sup>2</sup> in area and less than 2m in height.</u></li> </ol>

		exempted from the standard as they do not impact on built form or building density.	
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