

NZ PORK



FURTHER SUBMISSION ON Mackenzie District Plan PC23

27 February 2024

SUBMITTER: New Zealand Pork Industry Board

Introduction

The New Zealand Pork Industry Board (NZPork) welcomes the opportunity to make a further submission on the Mackenzie District Plan PC23.

As the industry body representing commercial pig farmers, NZPork represents a relevant aspect of the public interest. 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.

Contact for service:

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Submitter	Submission Point	Support / Oppose	Reasons for support or opposition are	I seek that the whole (or part) of the submission be allowed (or disallowed) for the details below
Helios Energy Limited	8.04	Support	The notified version of the definition reflects the transitional definition of Highly Productive Land under the National Policy Statement for Highly Productive Land. Support amending definition to reflect requirements of clauses 3.4 and 3.5 of the NPS HPL.	Allow submission point
New Zealand Agricultural Aviation Association	2.14	Support	Support objectives that prioritise primary production and support activities.	Allow submission point.
Director General of Conservation	7.10	Oppose	<p>Submitter states that primary production should only be prioritised on HPL. This neglects the fact that there are many farming operations not situated on HPL that still have a functional and operational need to locate in the GRUZ and require the same prioritisation and protection from incompatible activities as those on HPL in order to operate.</p> <p>The definition of the GRUZ in the National Planning Standards refers to “Areas used <u>predominantly</u> for primary production activities, including intensive indoor primary production” Therefore prioritising primary production activities within the wider GRUZ, and not just on areas on HPL, is an appropriate planning response.</p>	Disallow submission point.
Aviation New Zealand on behalf of the New Zealand	19.11	Support	Support objectives that prioritise primary production and supporting activities.	Allow submission point

Helicopter Association				
PF Olsen	24.24	Support	Support objectives that prioritise primary production and supporting activities.	Allow submission point
South Canterbury Province Federated Farmers of New Zealand	27.01	Support	Support objectives that prioritise primary production and supporting activities.	Allow submission point
Port Blakely	29.08	Oppose	The definition of primary production includes forestry, therefore plantation forestry does not need to be singularly promoted above any other type of activity in the GRUZ as part of this high-level objective.	Disallow submission point.
Genesis Energy Litmitied	40.06	Support	Supports providing for activities where they rely on the natural resource found only in a rural location which is supported.	Allow submission point
Meridian Energy Limited	44.10	Support	Supports providing for activities where they rely on the natural resource found only in a rural location which is supported.	Allow submission point
New Zealand Agricultural Aviation Association	2.15	Support	Supports objectives recognising activities that have a functional need within the zone and that allows primary production and supporting activities without being compromised by the risks of reverse sensitivities	Allow submission point
Fire and Emergency New Zealand	4.06	Support	Supports objectives recognising activities that have a functional need within the zone	Allow submission point

Aviation New Zealand on behalf of the New Zealand Helicopter Association	19.12	Support	Supports objectives recognising activities that have a functional need within the zone and that allows primary production and supporting activities without being compromised by the risks of reverse sensitivities	Allow submission point
Forest and Bird	36.11	Oppose	<p>Recognition of natural landscape, character, features and indigenous biodiversity values are addressed in the NFL and EIB chapters, which apply to the GRUZ.</p> <p>The GRUZ chapter introduction states that areas with important values are “<i>managed through the district-wide Natural Features and Landscapes chapter in Part 2 of the District Plan, which apply in addition to the provisions set out below</i>”</p> <p>The proposed clause uses broad wording not reflective of the targeted nature of the provisions of the NFL chapter to ONL and ONF areas of the GRUZ only.</p>	Disallow submission point.
Ministry of Education	38.16	Support	Support acknowledgement of the potential for reverse sensitivity effects from educational facilities and the importance of managing adverse effects within the GRUZ.	Allow submission point
New Zealand Agricultural Aviation Association	2.16	Support	Supports policies that enable primary production and seek to have supporting activities enabled consistent with the heading for the policy. Support change to wording to clarify that points 1 and 2 don't limit the policy intent	Allow submission point
Simpson Family Trust	16.08	Support	Support addition of clause to recognise that the character and amenity of the rural zone is influenced by primary production activities that can produce noise, dust, odour and traffic that may be noticeable to residents and visitors to the GRUZ. The baseline of	Allow submission point.

			managing effects from activities in the GRUZ should include a level of tolerance for such effects in a working rural environment.	
Aviation New Zealand on behalf of the New Zealand Helicopter Association	19.13	Support	Support change to wording to clarify that points 1 and 2 don't limit the policy intent	Allow submission point
Forest and Bird	36.12	Oppose	The proposed changes are unnecessary as they duplicate the provisions of the NFL and EIB chapters, which also apply to the GRUZ. Enabling primary production is an appropriate planning response for a zone that is intended to be used predominantly for primary production. Enabling this activity does not negate the need to consider the provisions of the NFL and EIB chapters.	Disallow submission point.
New Zealand Agricultural Aviation Association	2.17	Support	Supports recognition of the importance of primary production and activities which support it	Allow submission point
Director General of Conservation	7.11	Oppose	Prioritising primary production is an appropriate planning response for a zone that is intended to be used predominantly for primary production (as per the National Planning Standards).	Disallow submission point.
New Zealand Agricultural Aviation Association	2.18	Support	Supports policies that protect primary production and supporting activities from reverse sensitivities.	Allow submission point

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PF Olsen	24.28	Support in part	Agree that the policy should not be limited to non-farm development. Prefer relief suggested by NZPork submission point 26.12 to refer instead to sensitive activities, which are defined in the plan.	Allow submission point in part
Helios Energy Limited	8.01	Support	Agree that GRUZ P4 clause 2 is inconsistent with the intent of the NPS-HPL.	Allow submission point
PF Olsen	24.30	Support	Agree that the policy is consistent with the NPS-HPL. Important to have a pathway for the maintenance, operation or upgrade of existing activities on HPL	Allow submission point
South Canterbury Province Federated Farmers of New Zealand	27.07	Support	Agree that the policy is consistent with the NPS-HPL. Important to have a pathway for the maintenance, operation or upgrade of existing activities on HPL	Allow submission point
Forest and Bird	36.13	Oppose	Relief sought is inconsistent with clause 3.11(1)(a) of the NPS-HPL. Note that The National Policy Statement for Highly Productive Land: Guide to Implementation provides guidance to territorial authorities on interpretation of Clause 3.11 with respect to expansion or intensification.	Disallow submission point
Opuha Water Ltd	43.07	Oppose	Relief sought is inconsistent with clause 3.11(1)(a) of the NPS-HPL.	Disallow submission point
Director General of Conservation	7.13	Oppose in part	Agree with submitter that a catch-all PER rule may include some higher-risk activities that have been overlooked in the rule structure for the GRUZ, however, the relief sought would require specific PER rules for all types of primary production that occur throughout the district and are typically low risk. Suggest instead more consideration	Disallow submission point in part.

			and specific rule structure for activities that may require more scrutiny.	
Ministry of Education	38.20	Support in part	<p>Support PA status for educational facilities, subject to standard GRUZ-S5, as these are sensitive activities and may give rise to reverse sensitivity effects. Support RDIS status for non-compliance with PA rule.</p> <p>Matters of discretion should include the extent to which the activity may result in conflict and/or reverse sensitivity effects with other activities occurring on adjacent rural land.</p>	<p>Allow submission point in part. Add to proposed matters of discretion:</p> <p><u>4. the extent to which the activity may result in conflict and/or reverse sensitivity effects with other activities occurring on adjacent rural land.</u></p>
Opuha Water Ltd	43.13	Oppose	<p>Relief sought is a duplication of regional council function. Land use effects on water quality from intensive farming are regulated by the regional council through the Canterbury Land and Water Plan. Rules 5.31 – 5.37 of the CLWRP cover stock holding areas and effluent holding and discharge areas, including setback distances to waterways of 20m.</p> <p>300m setback to sensitive activities is deemed an appropriate distance to manage amenity effects, such as odour and dust, from land use associated with intensive farming activities. It has no relevance to water quality.</p>	Disallow submission point
Milward Finlay Lobb Ltd	48.06	Oppose	<p>Submitter gives no evidence to support 150m proposal.</p> <p>Complaints arising from reverse sensitivity effects from new developments in close proximity to existing pig farms are the biggest environmental issue that threatens the viability of pig farms in NZ. Effective land use planning is essential to manage the impacts of incompatible activities with important primary production activities</p>	Disallow submission point

		<p>within the GRUZ. Setbacks are a simple but effective way to minimise reverse sensitivity effects.</p> <p>300m is an appropriate minimum distance for a new sensitive activity in relation to existing intensive primary production activities and is consistent with setback distances adopted in other district plans within the Canterbury region.</p>	
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END OF SUBMISSION.