



19 OCTOBER 2017

Dear Robert,

Selwyn District Plan- rural rules relevant to pork production activities

Thank-you for the opportunity to provide feedback on the current district plan rural chapter rules and definitions.

Please find the feedback from NZ Pork in the tables that follow.

Kind regards,

A handwritten signature in black ink, appearing to read "Jeska", is positioned below the text "Kind regards,".

Jeska McHugh

Environmental Advisor

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Definitions	
Existing Definition	Feedback
<p><i>INTENSIVE PIGGERY PRODUCTION ACTIVITY</i> means the use of land and buildings for the commercial rearing and management of pigs where the viability of the activity is not dependent upon the soil fertility of the land on which that activity is undertaken.</p>	<p><i>INTENSIVE PIGGERY PRODUCTION ACTIVITY</i> <u><i>INDOOR PIG FARMING</i></u> means the use of land and buildings for the commercial rearing and management of pigs where the viability of the activity is not dependent upon the soil fertility of the land on which that activity is undertaken. <u>means breaking or rearing of pigs where the predominant productive processes are carried out within buildings or closely fenced outdoor runs where the stocking density precludes the maintenance of pasture or ground cover.</u></p> <p>There are a range of different farming styles used in pork production activities. These styles fall under two main styles 'indoor' and 'outdoor'.</p>
<p><i>New definition proposed</i> <i>OUTDOOR PIG FARMING</i></p>	<p><u><i>OUTDOOR PIG FARMING</i></u> <u>means the keeping, breeding or rear for any purpose, of pigs on pasture (but including areas used for access to shelter) at a stocking density that sustains the maintenance of pasture or ground cover.</u></p> <p>NZ Pork recommends a new definition be added for outdoor pig farming. This definition is offered as an alternative to an 'extensive' farming definition.</p>
<p><i>New definition proposed</i> <i>GROUND COVER</i></p>	<p><u><i>GROUND COVER</i></u> <u>means the minimum ground cover requirements outlined in the Industry Agreed Good Management Practices: Outdoor Pigs.</u></p> <p>NZ Pork recommends a new definition be added for ground cover. NZ Pork specifies the following ground cover levels. These levels will be reviewed as part of ongoing work on the GMPs. Therefore, it is recommended that the definition refer to the GMPs as opposed to prescribe limits which may change periodically based on improved research and data.</p>

	<p>The GMP definition of ground cover is: For all dedicated outdoor pig units, or those in a pastoral rotation, the minimum ground cover is:</p> <ul style="list-style-type: none">• For Dry and lactating sows (40% cover on 75% of land, < 40 % cover permissible of 25% land. Each paddock to have on average >10% cover) and for farrowing sows (at least 70 %).• For all outdoor pig units that form part of an arable operation the minimum ground cover is: for dry and lactating sows (25 % (100% to 0 % in 2 years)) and for farrowing sows (at least 70 %)
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Rural Chapter Rules	
Existing Rules	Feedback
<p>9.2 <i>ACTIVITIES – LISTED ACTIVITIES</i> <i>Discretionary Activities – Listed Activities</i> 9.2.1.2 <i>Any activity which involves the composting of organic material, where that material is brought on to the site except where additional material such as saw dust or straw is required as part of the process of composting pigs;</i></p>	<p>NZ Pork supports rule 9.2.1.2 as the composting of pigs within saw dust or straw is the preferred method of carcass disposal.</p>
<p>9.6 <i>ACTIVITIES AND CONTAMINATED LAND</i> <i>Permitted Activities: Activities and Contaminated Land</i> 9.6.1.4 <i>Growing or rearing of food crops or livestock;</i></p>	<p>9.6.1.4 <i>Growing or rearing of food crops or livestock (<u>raised outdoors</u>);</i></p> <p>There should be no issue with having an indoor pig farm with an impervious floor situated on contaminated land.</p>
<p>9.8 <i>ACTIVITIES AND THE KEEPING OF ANIMALS</i> <i>Permitted Activities – Activities and the Keeping of Animals</i> 9.8.1 <i>The keeping of animals shall be a permitted activity if all of the following conditions are met:</i> 9.8.1.1 <i>Any keeping of animals does not include:</i> (a) <i>The boarding of animals, including catteries and kennels; and</i> (b) <i>Intensive livestock production;</i></p>	<p>9.8 <i>ACTIVITIES AND THE KEEPING OF ANIMALS</i> <i>Permitted Activities – Activities and the Keeping of Animals</i> 9.8.1.1 (b) <i>Intensive livestock farming production;</i></p> <p>NZ Pork would like to see the term ‘intensive’ removed from the plan and consistency in language either farming or production.</p>
<p>9.10 <i>New rule</i></p>	<p><u>9.10. x</u> <i>The establishment and operation of outdoor farming is a permitted activity.</i></p> <p>NZ Pork recommends that outdoor farming is a permitted activity.</p>

9.10

Activities and Intensive Livestock Farming

Controlled Activities — Activities and Intensive Livestock Farming

Expansion of Existing Intensive Piggery Production Activity

9.10.1

The expansion of any existing intensive piggery production activity shall be a controlled activity if all of the following standards and terms are met:

9.10.1.1

That the applicant has obtained an air discharge consent or if no consent is required a Certificate of Compliance from the Canterbury Regional Council, covering the discharge of odour from the proposed expanded piggery.

9.10.1.2

The proposed expansion would result in a nil increase in overall odour emission rate from the site. The applicant shall provide an assessment from a suitably qualified expert which demonstrates the nil increase in overall odour emission rate from the site. The assessment shall consider relevant New Zealand and international odour emission rate information and research for the piggery industry. The Council may appoint its own suitably qualified expert (the expert is to be agreed to with the applicant) to peer review the assessment provided by the applicant to confirm compliance with this standard.

9.10.1.3

The increase in the number of stock pig units (SPUs) shall not exceed 50% of the existing SPUs, where SPU is to be calculated from existing stock numbers as per Table C9.1 below.

Table C9.1 - Standard SPU multipliers for different classes of pig

	Definition	SPU Factor
Gilt	24-30 weeks	1.8
Boar	100-300kg	1.6
Gestating sow	160-230kg	1.6
Lactating sow	160-230kg	2.5

9.10

Activities and ~~Intensive~~ Livestock Farming

Controlled Activities — Activities and ~~Intensive~~ Livestock Farming

Expansion of Existing Indoor Pig Farm ~~Intensive Piggery Production Activity~~

9.10.1

The expansion of any existing indoor pig farm ~~intensive piggery production~~ activity shall be a controlled activity if all of the following standards and terms are met:

9.10.1.2

The proposed expansion would not result in an ~~nil~~ increase in overall odour emission rate ~~from the site~~ beyond the boundary. In the absence of a Canterbury Regional Council Consent or a Certificate of Compliance the applicant shall provide an assessment from a suitably qualified expert which demonstrates the nil increase in overall odour emission rate from the site. The assessment shall consider relevant New Zealand ~~and international~~ odour emission rate information and research for the piggery industry. The Council may appoint its own suitably qualified expert (the expert is to be agreed to with the applicant) to peer review the assessment provided by the applicant to confirm compliance with this standard.

NZ Pork’s preference is that the Environment Canterbury rules are recognised within the plan so that farmers compliant with the Environment Canterbury rules regarding odour are not required to undergo another assessment.

NZ Pork is not aware of any international odour emission rates which would be relevant to the pork production systems in New Zealand.

NZ Pork has committed to develop an odour management plan template that will be sent to both Selwyn District Council and Environment Canterbury for feedback.

9.10.1.3

Sucker	0-4 weeks	0.1
Weaner	4-10 weeks	0.5
Grower	10-16 weeks	1
Finisher	16-24 weeks	1.6
Heavy Finisher	Over 24 weeks	1.8

9.10.1.4

The applicant has prepared a management plan to deal with activities that have the potential to produce an offensive or objectionable odour. This management plan shall address the following:

- (a) Management of shed
- (b) Effluent collection and storage systems
- (c) Manure application to land systems
- (d) Carcass disposal system
- (e) Landscaping and building design
- (f) The keeping of monitoring and maintenance records
- (g) Performance review process
- (h) Any consultation with the local community and the operation of a complaints system.

9.10.2

In considering any application for a resource consent under Rule 9.10.1 the Council shall, in granting consent and in deciding whether to impose conditions, exercise its control over the following matters:

9.10.2.1

Any adverse effects from odour, dust, noise or traffic on surrounding properties;

9.10.2.2

The effectiveness of any proposed mitigation measures incorporated into the management plan to address potential adverse effects;

9.10.2.3

The location of buildings to avoid, remedy or mitigate potential adverse odour effect associated with any relocation of the odour emission source to another part of the site;

The increase in the number of stock pig units (SPUs) shall not exceed 50% of the existing SPUs, where SPU is to be calculated from existing stock numbers as per Table C9.1 below.

Table C9.1 – Standard SPU multipliers for different classes of pig

-	Definition	SPU Factor
Gilt	24-30 weeks	1.8
Boar	100-300kg	1.6
Gestating sow	160-230kg	1.6
Lactating sow	160-230kg	2.5
Sucker	0-4 weeks	0.1
Weaner	4-10 weeks	0.5
Grower	10-16 weeks	1
Finisher	16-24 weeks	1.6
Heavy Finisher	Over 24 weeks	1.8

NZ Pork recommends that rule 9.10.1.3 is removed from the plan. The SPUs listed above are consistent with those published by Australian Pork Limited, however, the use of SPUs is outdated in New Zealand. SPUs are infrequently used to calculate effluent volumes then the expected nutrient content of that effluent in the absence of actual test results.

There are two categories of stock finishing systems in pork production 1) farrow to wean and 2) farrow to finish. It would be reasonable that a farrow to wean farm could decide to finish those pigs. In a typical farm this would result in an 134% increase in SPUs as grower and finishing pigs have a much higher SPU (see accompanying spreadsheet SPU Check for SDC.xlsx). There is no option to reduce other classes of pig to stay under a 50% increase as the farm requires a certain ratio of pig classes to deliver the weekly volume that leaves farm for processing. It is expected that the control on the effects

9.10.2.4

Any positive effects which may offset any adverse effects;

9.10.2.5

Any monitoring or review conditions.

of increased livestock numbers will take place through rule 9.10.1.2 and the need to have a consent if ground cover requirements are not meet.

9.10.1.4

The applicant has prepared a management plan to deal with activities that have the potential to produce an offensive or objectionable odour. This management plan shall address the following:

- (a) Management of sheds and barns*
- (b) Effluent collection and storage systems*
- (c) Manure application to land systems*
- (d) Carcass disposal system*
- (e) Compost management*
- (f) Landscaping and building design*
- (g) Management and maintenance of ground cover at an outdoor farm*
- (h) The keeping of monitoring and maintenance records*
- (i) Performance review process*
- (j) Any consultation with the local community and the operation of a complaints system.*

NZ Pork recommends the above items are included in the plan which would allow alignment with the NZ Pork Farm Environment Plan template.

~~9.10.2.2~~

~~*The effectiveness of any proposed mitigation measures incorporated into the management plan to address potential adverse effects;*~~

NZ Pork recommends that rule 9.10.2.2 is deleted from the plan.

9.10.2.3

	<p><i>The location of buildings <u>infrastructure</u> to avoid, remedy or mitigate potential adverse odour effect associated with any relocation of the odour emission source to another part of the site;</i></p> <p>NZ Pork recommends that the word ‘buildings’ is replaced with ‘infrastructure’ to capture other structures.</p>
<p><i>Restricted Discretionary Activities — Activities and Intensive Livestock Farming</i></p> <p><i>9.10.3</i> <i>The establishment of any new site for intensive livestock production or the expansion of any existing intensive livestock production activity shall be a restricted discretionary activity, unless it is a controlled activity under Rule 9.10.1.</i></p> <p><i>9.10.4</i> <i>Under Rule 9.10.3 the Council shall restrict its discretion to consideration of:</i></p> <p><i>9.10.4.1</i> <i>Any adverse effects from odour, dust, noise or traffic on surrounding properties;</i></p> <p><i>9.10.4.2</i> <i>The effectiveness of any proposed mitigation measures to address potential adverse effects;</i></p> <p><i>9.10.4.3</i> <i>Any positive effects which may offset any adverse effects; and</i></p> <p><i>9.10.4.4</i> <i>Any monitoring or review conditions.</i></p>	<p><i>Restricted Discretionary Activities — Activities and <u>Indoor or High Density Livestock Farming</u></i></p> <p><i>9.10.3</i> <i>The establishment of any new site for intensive livestock production <u>indoor or high density farming</u> or the expansion of any existing intensive livestock production activity <u>indoor or high density farm</u> shall be a restricted discretionary activity, unless it is a controlled activity under Rule 9.10.1.</i></p> <p>NZ Pork’s preference is to have the term ‘intensive’ removed from the plan.</p> <p><i>9.10.4</i> <i>Under Rule 9.10.3 the Council shall restrict its discretion to consideration of:</i></p> <p><i>9.10.4.1</i> <i>Any adverse effects from odour <u>or dust in the absence of a Canterbury Regional Council air discharge permit or a Certificate of Compliance,</u></i></p> <p><i>9.10.4.2</i> <i><u>Any adverse effects from noise or traffic on surrounding properties;</u></i></p> <p>NZ Pork’s preference is that the Environment Canterbury rules are recognised within the plan so that farmers compliant with the Environment Canterbury rules regarding odour are not required to undergo another assessment.</p> <p><i>9.10.4.2</i></p>

	<p><i>The effectiveness of any proposed mitigation measures to address potential adverse effects;</i></p> <p>NZ Pork recommends that rule 9.10.4.2 is deleted from the plan</p>
<p>9.13 ACTIVITIES AND VEHICLE MOVEMENTS Permitted Activities — Activities and Vehicle Movements 9.13.1 Any activity which does not exceed the following maximum number of vehicle movements shall be a permitted activity: 9.13.1.1 Road Unformed and, or not maintained by Council: (a) For any commercial or industrial related activity where access is required off an unformed and un-maintained road, excluding normal farming activities: Nil. (b) For any individual property access off an unformed and un-maintained road: 15 equivalent car movements per day(ecm/d) per site.</p> <p>9.13.1.2 Road Formed, Sealed and maintained by Council: (a) State Highway and Arterial Roads (as identified in Appendix 9): 30 ecm/d per site averaged over any one week period). b) Local and Collector Roads: 60 ecm/d per site (averaged over any one week period). 9.13.1.3 Road Formed, Unsealed and maintained by Council: (a) 60 ecm/d per site (averaged over any one week period). Note: 1</p>	<p>9.13 ACTIVITIES AND VEHICLE MOVEMENTS 9.13.1.1 (b) For any individual property access off an unformed and un-maintained road: 15 20 equivalent car movements per day(ecm/d) per site.</p> <p>NZ Pork recommends that equivalent car movements per day increased from 15 to 20 ecm/d per site on unformed roads. This is based on feedback from individual farms regarding their vehicle movements. Pig farms have a variety of regular vehicle movements including employees, stock in and out, effluent trucks, straw in, compost out, feed in etc. Pig farms are not seasonal and operate 365 days a year and run on a weekly cycle which frequent traffic movements.</p>

Rule 9.13.1 does not apply to vehicle movements between sites within a property; relocating of premises; or any other temporary activity.

2

For the purposes of Rule 9.13.1.2, Local roads are those roads which are not listed in Appendix 9 as State Highways, Arterial Roads, or Collector Roads.

3

Rule 9.13.1 does not apply to the areas shown on the Planning Maps as the Existing Development Areas for Terrace Downs and Grasmere – refer to the provisions in Appendix 21 (Terrace Downs) or Appendix 22 (Grasmere).

4

Rule 9.13.1 does not apply to existing plantations.

5

Rule 9.13.1 does not apply to roads within the Porters Ski and Recreation Area.

6

The Selwyn District Council Traffic and Parking Bylaw 2009 (and subsequent versions) applies to both permanent and temporary activities and may require the preparation of a Traffic Management Plan in certain circumstances. Please refer to the Bylaw for further details.

Discretionary Activities — Activities and Vehicle Movements

9.13.2

Any activity which does not comply with Rule 9.13.1 shall be a discretionary activity. The Council's discretion may include but shall not be limited to:

9.13.2.1

Any works required to the road to upgrade it to the standards set out in the Council's Engineering Code of Practice;

9.13.2.2

Any potential adverse effects of traffic on the amenity values of surrounding residents and on other uses of the road, including (but not limited to) stock droving;

9.13.2.3

In respect to the integration of land use and transport, the appropriateness of the location within the existing and planned road network.

9.13.2.4

The position and design of any vehicle crossing or vehicle access and egress;

9.13.2.5

Any positive effects which may offset any adverse effects; and

9.13.2.6

Any other relevant matters including relevant objectives and policies.

9.13.2.7

Any monitoring or review conditions.