

**SUBMISSION TO THE PROPOSED MARLBOROUGH ENVIRONMENT PLAN
 NZ PORK INDUSTRY BOARD
 31 AUGUST 2016**

The specific parts of the Proposed Plan (Volume, Chapter and Provision No.) the submission relates to:	My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)	The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)
VOLUME 1		
5. ALLOCATION OF PUBLIC RESOURCES		
Setting of environmental limits		
Policy 5.2.5 – With the exception of water taken for domestic needs or animal drinking water, prevent the taking of water authorised by resource consent when flows and/or levels in a Freshwater Management Unit are at or below a management flow and/or level set as part of an environmental flow and/or level set in accordance with Policy 5.2.4.	Support	Retain Policy 5.2.5 and the exception of water taken for domestic needs or animal drinking water from minimum flows.
Enable access to reliable supplies of freshwater		
Policy 5.3.1 – To allocate water in the following order of priority: (a) natural and human use values; then (b) aquifer recharge; then (c) domestic and stock water supply; then (d) municipal water supply; and then (e) all other takes of water.	Support	Support a clear priority allocation to domestic and stock water supply.
11. NATURAL HAZARDS		
Flooding – management of activities in flood prone areas		
Policy 11.1.9 – Establish a hierarchy of flood risk as follows: (a) Level 1: Land that suffers flooding of shallow, low velocity water in a flood event with an annual recurrence interval of 1 in 50 years; (b) Level 2: Land that suffers flooding but the depth/velocity of the	Support	Support clarity in policy about flood hazard risks.

<p>flooding is not well understood, or cannot easily be expressed relative to natural ground level, in a flood event with an annual recurrence interval of 1 in 50 years, or land within 8 metres of any lake, river or wetland;</p> <p>(c) Level 3: Land that suffers flooding of deep, fast flowing water in a flood event with an annual recurrence interval of 1 in 50 years, or land in the bed of any lake or river or in any wetland; and</p> <p>(d) Level 4: Land that has the potential to suffer flooding of deep, fast flowing water in an extreme flood event that overwhelms stopbanks and other constructed flood defences.</p>		
<p>Policy 11.1.10 – Control the erection and placement of houses and other habitable structures within areas subject to a flood hazard overlay, and reduce the risks to life and property by:</p> <p>(a) establishing minimum floor levels for houses and other habitable structures subject to a Level 1 flood risk, set at least 450 mm above the natural ground level as measured at any point of the building footprint. The building footprint includes any associated on-site wastewater management system;</p> <p>(b) requiring houses and other habitable structures subject to a Level 2 flood risk to be subject to evaluation of the flooding hazard and effective mitigation actions; and</p> <p>(c) avoiding houses and other habitable structures in locations where they will be subject to a Level 3 flood risk.</p>	Support	Support policy and method differentiation between controls on the erection and placement of houses and other habitable structures from rural farm buildings.
<p>Policy 11.1.16 – Refine the boundaries of flood hazard overlays in response to:</p> <p>(a) changes to levels of protection provided by flood defences and other flood mitigation/management works; or</p> <p>(b) new observations of flood events or more detailed assessment of the flood hazard; or</p> <p>(c) changes in catchment hydrology due to land use change or climate change; or</p> <p>(d) changes in flood hydraulics due to channel aggradation or erosion, vegetation growth within the floodway or sea level rise.</p>	Support	Support refinement of flood hazard overlays and working with landowners to assist in clarifying risk.
<p>14. USE OF THE RURAL ENVIRONMENT</p>		

<p>Introduction</p> <p>With its flat land and alluvial soils, the Wairau Plain around Blenheim is the most intensively developed rural area of Marlborough. The environment here is highly modified, the subject of an extensive flood management and drainage system that benefits some 10,000 hectares of productive land. Favoured by mild climatic conditions, close to centres of population and water resources, a wide range of land uses have developed on the Wairau Plain, including viticulture, horticulture, tourist facilities, rural industrial activities, traditional livestock farming and the farming of crops and other intensive farming enterprises. Many people in this area live on small rural lifestyle blocks. Within this environment are located the airports of Blenheim and Omaka servicing the District nationally and regionally.</p>	<p>Support</p>	<p>Support recognition of intensive farming as an established activity in rural Marlborough and provide for industry growth.</p>
<p>Objective 14.1 – Rural environments are maintained as a resource for primary production activities, enabling these activities to continue contributing to economic wellbeing whilst ensuring the adverse effects of these activities are appropriately managed.</p>	<p>Support</p>	<p>Retain for enabling objective.</p>
<p>Policy 14.1.1 – Enable the efficient use and development of rural environments for primary production.</p>	<p>Support in part</p>	<p>Retain enabling policy.</p> <p>Amend description to also identify intensive farming.</p>
<p>Policy 14.1.2 – Parcel size in rural environments shall ensure there is adequate choice for primary production and avoids the fragmentation of land for primary productive use.</p>	<p>Support</p>	<p>Avoid inappropriate subdivision and development of land used for primary production.</p> <p>Lifestyle/rural-residential subdivision should be limited in scale and extent to defined locations to avoid conflict with production use.</p>
<p>Policy 14.1.3 – Activities and buildings in rural environments should be linked to land based primary production of Marlborough’s rural resources and require a rural location.</p>	<p>Support</p>	<p>Plan must clearly provide for those buildings and structures that support rural production and require a rural location and those activities that have locational choice.</p>

<p>Policy 14.1.4 – Manage primary production activities to ensure they are carried out sustainably through the implementation of policies and methods (including rules establishing standards for permitted activities) to address potential adverse effects on:</p> <ul style="list-style-type: none"> (a) the life supporting capacity of soils, water, air and ecosystems; (b) natural character of rivers, wetlands and lakes; (c) water quality and water availability; (d) areas with landscape significance; (e) areas with significant indigenous vegetation and significant habitats of indigenous fauna; (f) the values of the coastal environment as set out in Issue 13A of Chapter 13 - Use of the Coastal Environment; or (g) the safe and efficient operation of the land transport network and Marlborough’s airports 	<p>Support</p>	<p>Agree with a management approach.</p>
<p>Policy 14.1.5 – Require rural subdivisions to provide a minimum of two cubic metres of drinkable water per new allotment, per day.</p>	<p>Support</p>	<p>Avoid inappropriate subdivision and development of land used for primary production.</p> <p>A dwelling house to be established on rural properties as a permitted activity must be able to provide sufficient water of adequate quality on the property to provide for an individual’s reasonable domestic needs that does not compromise the needs of rural production.</p> <p>The priority for water allocation must be to rural production activities in the rural environment.</p>
<p>Policy 14.1.7 – Recognise that primary production activities in rural environments may result in effects including noise, dust, smell and traffic generation, but that these will require mitigation where they have a significant adverse effect on the environment.</p>	<p>Support in part</p>	<p>Amend policy to note that these effects are anticipated and expected in the rural environment.</p>
<p>Policy 14.1.9 – Manage the effects of primary production activities to</p>	<p>Support in part</p>	<p>Policy needs to be balanced with policy and</p>

ensure the environmental qualities and amenity values in adjoining residential zones are not unreasonably degraded, bearing in mind their location adjacent to a primary production environment.		methods imposed on new or expanding activities in adjoining residential environments.
Objective 14.2 – The sustainability of Marlborough’s rural economy is not adversely affected by the spread or introduction of pests.	Support in part	The objective is supported but would be improved to also refer to biosecurity risks as follows: The sustainability of Marlborough’s rural economy is not adversely affected by the spread or introduction of pests <u>or biosecurity risks</u> .
Policy 14.2.1 – The Marlborough District Council will support any national response to an incursion of a pest(s) where this occurs, if it has the potential to reach Marlborough or is already present and/or has the potential to affect Marlborough’s primary production sector.	Support in part	The policy would be improved by referencing to pests and biosecurity risks.
Policy 14.2.2 – A strategic approach will be developed and maintained to manage the containment/eradication of pests impacting on Marlborough’s primary production sector in rural environments.	Support	Support a proactive and coordinated approach to pest and biosecurity management with landowners.
Policy 14.2.3 – Raising community awareness that all individuals have responsibilities in pest management, particularly land occupiers.	Support	Support a proactive and coordinated approach to pest and biosecurity management with landowners.
Policy 14.2.4 – Recognise subdivision of land and more intensive development of rural areas increases the potential to spread pests and the Marlborough District Council will use a range of methods to reduce the risk of spread, including: (a) where resource consent is required for subdivision or development, consideration will be given to measures to reduce the risk of spread; (b) undertaking greater monitoring and surveillance of pests within areas where pests are present; (c) being proactive in coordinating the various groups involved with earth moving equipment to develop protocols and practices to assist with the reduction in the spread of plant pests; and (d) providing information for new rural landowners and people	Support	Support a proactive and coordinated approach to pest and biosecurity management with landowners.

subdividing rural property about their responsibilities in pest management, including whether landowners have obligations for their property under regional or national pest management plans		
Objective 14.3 – Activities that are not related to primary production are appropriate to be located within rural environments.	Oppose	Understand the intent but this is not a well worded objective. Reword to a policy that prevents sensitive activities not related to primary production from establishing in areas where rural production activities could be adversely affected.
Policy 14.3.1 – Enable small scale and/or low intensity activities not relying on the primary production potential of Marlborough’s rural environments, where the adverse effects on the environment are minor and the activity is one of the following: (a) outdoor recreation; or (b) events of a limited duration.	Oppose in part	Amend policy so that adverse effects on rural production activities are avoided.
14.3.2 – Where an activity is not related to primary production and is not otherwise provided for as a permitted activity, a resource consent will be required and the following matters must be determined by decision makers in assessing the impacts on primary production before any assessment of other effects is undertaken: (a) the extent to which the activity is related to primary production activities occurring at the site; (b) the functional need for the activity to be located within a rural zone and why it is not more appropriately located within another zone; (c) whether the proposed activity will result in a loss of land with primary production potential and the extent of this loss when considered in combination with other non-rural based activities; and (d) the extent to which the proposed activity supports primary production activities, including the processing of agricultural, viticultural or horticultural produce.	Support in part	Amend policy to address effects on other rural resources (not just loss of land). Including access to freshwater, degradation of water resources. Amend policy to address reverse sensitivity.
Objective 14.4 – Rural character and amenity values are maintained and enhanced and reverse sensitivity effects are avoided.	Support in part	Rural character and amenity is often characterized and defined by rural production activities.

		Support an objective that requires reverse sensitivity effects to be avoided.
<p>Policy 14.4.1 – Subdivision, use and development of Marlborough’s rural environments should be of a density, scale, intensity and location that individually and cumulatively recognises the following elements:</p> <p>(a) a lack of buildings and structures;</p> <p>(b) a very high ratio of open space in relation to areas covered by buildings;</p> <p>(c) open space areas in pasture, trees, vineyards, crops or indigenous vegetation;</p> <p>(d) areas with regenerating indigenous vegetation, particularly in the Marlborough Sounds;</p> <p>(e) tracts of unmodified natural features, indigenous vegetation, streams, rivers and wetlands;</p> <p>(f) farm animals and wildlife;</p> <p>(g) noises, smells and sights of agriculture, viticulture, horticulture and forestry;</p> <p>(h) post and wire fences, purpose-built farm buildings and scattered dwellings;</p> <p>(i) low population density;</p> <p>(j) the presence of Blenheim, Omaka and Koromiko airports;</p> <p>(k) generally narrow carriageways within wide road reserves, often unsealed with open drains, low-speed geometry and low traffic volumes; and</p> <p>(l) a general absence of urban-scale and urban-type infrastructure, such as roads with kerb and channel, footpaths, mown berms, street lights or advertising signs.</p>	Support in part	<p>Support description of those elements typical of the rural environment.</p> <p>Intensive farming should be listed given its requirement for a rural location.</p>
<p>Policy 14.4.3 – Ensure buildings are set back a sufficient distance from property boundaries and road frontages to:</p> <p>(a) maintain privacy and outlook for people on adjoining allotments, including for existing houses on small allotments;</p> <p>(b) encourage a sense of distance between buildings as well as</p>	Support in part	Amend policy to note the need to separate sensitive elements (in particular dwellings) from rural production activities.

between buildings and road boundaries; and (c) maintain the pleasantness, coherence, openness and attractiveness of the site as viewed from the road and adjoining sites.		
Policy 14.4.4 – Ensure subdivision in rural areas: (a) does not lead to a pattern of land uses that will adversely affect rural character and/or amenity values; and (b) creates allotments of sufficient size for rural activities to predominate in rural areas	Support in part	Amend policy to ensure subdivision in rural areas does not compromise the productive capability of rural areas or adversely affect the rural resources upon which rural production relies.
Policy 14.4.7 – Ensure significant adverse odour effects from rural activities are avoided or mitigated to protect lawfully established land uses.	Support in part	Balance policy with policy that addresses reverse sensitivity for lawfully established rural activities.
Policy 14.4.10 – Control the establishment of residential activity within rural environments as a means of avoiding conflict between rural and residential amenity expectations	Support in part	Amend policy to a policy of constraint on residential activity not control.
Objective 14.5 – Residential activity takes place within appropriate locations and limits within rural environments.	Support	Support identify areas to limit scale and extent of residential activity.
Policy 14.5.1 – Identify areas within rural environments where residential activity is appropriate.	Support	Support identify areas to limit scale and extent of residential activity.
Policy 14.5.2 – Residential activity and subdivision for residential purposes within rural environments should take place within land zoned Rural Living, Coastal Living, Urban Residential 2 at Marlborough Ridge and Urban Residential 3, to: (a) protect primary production options; (b) protect rural character and amenity values; (c) avoid sprawling or sporadic patterns of residential development; (d) avoid any further over-allocation of water resources; (e) avoid adverse effects on water quality and soil quality; (f) reduce the potential for the spread of pest organisms; (g) reduce impacts on the land transport network; (h) protect landscape, natural character and indigenous biodiversity values; and (i) provide a transition from urban to rural environments.	Support	Support identify areas to limit scale and extent of residential activity. Avoid inappropriate residential activity in the rural environment.
Policy 14.5.3 – Except in the case of land developed for papakāinga, residential activity on land zoned Rural Environment will be provided	Support	Support identify areas to limit scale and extent of residential activity.

for by enabling one dwelling per Computer Register.		Avoid inappropriate residential activity in the rural environment.
14.M.3 Regional and district rules. Rural activities with the potential to cause significant adverse effects, such as dairy farming, factory farming and intensive livestock farming are provided for as discretionary activities. A number of other activities, including subdivision and residential activity within areas identified as water short will be determined as discretionary activities	Oppose	Oppose the use of the outdated and inappropriate term 'factory farming'. Replace with a reference to intensive farming that is used and defined elsewhere in the plan.
15. RESOURCE QUALITY (WATER, AIR, SOIL)		
Water		
Policy 15.1.25 – Recognise that, in many situations, non-regulatory methods will be an effective method of managing the adverse effects of non-point source discharges.	Support	The adoption of Good Management Practices for rural production activities should be supported.
Policy 15.1.26 – Encourage, in close association with rural industry groups, the use of sustainable rural land management practices.	Support	The adoption of Good Management Practices for rural production activities should be supported.
Air		
New Objective 15.3	Oppose current objective and policy platform for Air Quality	Add new objectives: <u>Incompatible uses and development are separated to manage adverse effects on air quality from discharges of contaminants into air and avoid or mitigate reverse sensitivity effects.</u> <u>The operational requirements of rural activities are recognised and provided for.</u>
New Policy 15.3.	Oppose current objective and policy platform for Air Quality	Add new policies: <u>Recognise that rural air quality is generally a result of dust and odours, and other emissions generated by rural production</u>

		<p><u>activities.</u></p> <p><u>Require adequate separation distance between rural land use which discharges dust and odour to air and activities that are sensitive to adverse effects of dust and odour discharges.</u></p>
16. WASTE		
Objective 16.3 – The discharge of liquid wastes onto or into land is managed in a way that avoids adverse effects on water and soil quality, land and water ecosystems, slope stability and cultural and amenity values.	Support	
Policy 16.3.2 – Require discharge permits for the discharge of contaminants onto or into land where there are significant environmental constraints to effective wastewater management.	Support	Where there are significant environmental constraints to effective wastewater management the discharge of contaminants onto or into land should be permitted.

VOLUME 2		
2. GENERAL RULES		
Water Take, Use, Damming or Diversion		
2.1. Environmental Flows and Levels 2.2. Permitted Activities 2.2.4. Take and use of water for the reasonable drinking water needs of an individual's animals.	Support	Retain permitted activity status for the take and use of water for the reasonable drinking water needs of an individual's animals.
2.1. Environmental Flows and Levels 2.2. Permitted Activities 2.2.5. Take and use of water for incidental use associated with farming up to 5m ³ per day per Computer Register.	Support in part / Oppose in part	An allocation to take and use of water for incidental use associated with farming is supported. The allocation limit should be the same as the allocation of 15m ³ per day for dairy shed wash water set out in Rule 2.2.6. A typical intensive pig farming activity would require in the order of 10-15m ³ per day for wash water. It is not equitable to specifically allocate water to one animal over another when both are legitimate rural production activities with wash water requirements for animal welfare.
3. RURAL ENVIRONMENT ZONE		
3.1. Permitted Activities		
3.1.25. Application of compost or solid agricultural waste into or onto land.	Support	Support Permitted Activity Status
3.1.26. Discharge of agricultural liquid waste (except dairy farm effluent) into or onto land.	Support	Support Permitted Activity Status
3.1.32. Disposal of offal or a carcass into an offal pit.	Support	Support Permitted Activity Status
3.1.33. Making compost or silage in a pit or stack, or stockpiling agricultural solid waste.	Support	Support Permitted Activity Status
3.1.47. Keeping of domestic livestock.	Support	Support Permitted Activity Status
3.2. Standards that apply to all permitted activities		

<p>3.2.1.4. On a site smaller than 4000m², no part of any building must exceed a height equal to the recession plane angle determined by the application of the Recession Plane and Height Controls in Appendix 26. The recession plane angle must be measured from a starting point 2m above ground level.</p>	<p>Oppose in part</p>	<p>Separate side and rear yard setbacks should be specified for sites under 4000m².</p>
<p>3.2.1.12. For a site larger than 4000m², the following minimum setbacks must be provided: (a) 8m for the front boundary; (b) 8m for the rear boundary; (c) 5m for a side boundary</p>	<p>Oppose</p>	<p>Residential dwellings in the rural environment are typically an activity sensitive to the effects of rural production. A larger separation distance should be imposed on new dwellings in the rural environment to avoid or mitigate reverse sensitivity issues.</p> <p>Separate side and rear yard setbacks should apply to:</p> <ul style="list-style-type: none"> • dwellings and their accessory buildings = 20m • all other rural buildings = 8m
<p>3.3. Standards that apply to specific permitted activities.</p>		
<p>3.3.25. Application of compost or solid agricultural waste into or onto land.</p> <p>3.3.25.1. The application must not occur within: (a) 50m of a bore unless the bore intercepts the confined layer of Riverlands FMU or the confined layer of the Wairau Aquifer FMU; (b) 20m of a river, lake, Significant Wetland, drainage channel or Drainage Channel Network; (c) 10m of a dwelling on any adjacent land in different ownership.</p> <p>3.3.25.2. The total cumulative nitrogen (N) loading from all discharges on the areal extent of land used for the application must not exceed 200 kg N/ha/year (excluding N from direct animal inputs).</p>	<p>Support</p>	<p>Support standards proposed where consistent with Good Management Practice for pig farming.</p>
<p>3.3.26. Discharge of agricultural liquid waste (except dairy farm effluent) into or onto land.</p>	<p>Support</p>	<p>Support standards proposed where consistent with Good Management Practice for pig farming.</p>

<p>3.3.26.1. The discharge must not occur into or onto a Soil Sensitive Area.</p> <p>3.3.26.2. The discharge must not occur within: (a) 50m of a bore unless the bore intercepts the confined layer of Riverlands FMU or the confined layer of the Wairau Aquifer FMU; (b) 20m of a river, lake, Significant Wetland, drainage channel or Drainage Channel Network; (c) 10m of the boundary of any adjacent land in different ownership.</p> <p>3.3.26.3. A high rate discharge system must not be used to discharge onto land with an average slope of 7° or greater, and the slope must not exceed 11.3° (1:5) at any point.</p> <p>3.3.26.4. The discharge must not occur when the soil moisture exceeds field capacity.</p> <p>3.3.26.5. Ponding must not be detectable beyond 24 hours after the discharge. 3.3.26.6. The discharge must not result in anaerobic soil conditions.</p> <p>3.3.26.7. The total cumulative nitrogen (N) loading from all discharges on the areal extent of land to be used for the discharge must not exceed 200 kg N/hectare/year (excluding N from direct animal inputs).</p> <p>3.3.26.8. The pH of the liquid waste must range between 4.5 and 9 immediately prior to discharge.</p> <p>3.3.26.9. Records of pH levels must be kept and available upon request by the Council.</p>		
<p>3.3.32. Disposal of offal or a carcass into an offal pit.</p> <p>3.3.32.1. The offal or carcass must be from pastoral agriculture,</p>	<p>Oppose</p>	<p>Oppose the inability to dispose of offal or carcass from intensive pig farming activities into an onsite offal pit subject to the</p>

<p>except intensive farming, undertaken on the same property.</p> <p>3.3.32.2. Only offal or a carcass may be disposed of to an offal pit.</p> <p>3.3.32.3. The disposal must not occur into or onto a Soil Sensitive Area identified as loess soils.</p> <p>3.3.32.4. The offal pit must not be located within: (a) 50m of a bore unless the bore intercepts the confined layer of Riverlands FMU or the confined layer of the Wairau Aquifer FMU; (b) 20m of a river, lake, Significant Wetland, drainage channel or Drainage Channel Network; (c) 50m of any boundary of the property or a dwelling.</p> <p>3.3.32.5. The offal pit must be located above the natural ground water level at all times.</p> <p>3.3.32.6. The offal pit must be completely covered by an impermeable material at all times or otherwise designed to prevent the entry of surface runoff when not in use.</p>		<p>proposed locational standards.</p> <p>There is no basis for rules that distinguish between the disposal of pigs from other animals when the same biological processes occur and the same environmental health risks can be managed.</p>
<p>3.3.33. Making compost or silage in a pit or stack, or stockpiling agricultural solid waste.</p> <p>3.3.33.1. The stack or stockpile must not be located on a Soil Sensitive Area identified as free-draining soils.</p> <p>3.3.33.2. The pit must not be located on a Soil Sensitive Area identified as a freedraining soil or a loess soil.</p> <p>3.3.33.3. The pit, stack or stockpile must not be located within: (a) 50m of a bore unless the bore intercepts the confined layer of Riverlands FMU or the confined layer of the Wairau Aquifer FMU; (b) 20m of a river, lake, Significant Wetland, drainage channel or Drainage Channel Network;</p>	<p>Oppose</p>	<p>Where these activities are supported by a hard stand area with no leaching of contaminants then it should be a permitted activity irrespective of the Soil Sensitivity Area.</p> <p>Methods adopted in other plans include a standard requiring that all new facilities must be situated on a sealed pad and the sealing layer must not exceed 1x10⁻⁹ m/s to prevent leachate. This would be an appropriate approach on Soil Sensitive Areas.</p>

(c) 10m of any boundary of any adjacent land in different ownership.		
3.3.33.4. The pit or stack must be completely covered by an impermeable material when not in use.		
3.3.33.5. There must be no runoff of leachate from the pit, stack or stockpile.		
3.3.33.6. Surface run-off must not enter the pit, stack or stockpile.		
3.6. Discretionary Activities		
3.6.1. Any activity provided for as a Permitted Activity, Controlled Activity or Restricted Discretionary Activity that does not meet the applicable standards.	Support in part / Oppose in part	Where non habitable buildings or structures are proposed within a Level 2 Flood Hazard Area, a Restricted Discretionary Activity could be developed with contained matters of assessment to reflect the actual or potential effects of the discharges
3.6.3. Intensive farming.	Support	Support activity listing.
3.6.12. Any discharge of contaminants into or onto land, or to air, not provided for as a Permitted Activity or limited as a Prohibited Activity.	Support in part / Oppose in part	Where discharges occur into or onto a Soil Sensitive Area that would otherwise be a permitted activity, a Restricted Discretionary Activity could be developed with contained matters of assessment to reflect the actual or potential effects of the discharges.
CHAPTER 5. URBAN RESIDENTIAL 1 AND 2 ZONE (INCLUDING URBAN RESIDENTIAL 2 GREENFIELDS ZONE)		
5.2. Standards that apply to all permitted activities	Oppose	Oppose lack of development standards on the rural urban interface to recognise and protect the adjoining rural production system. As a minimum the plan should develop methods such as setbacks, planting buffers, fencing, non-complaints covenants that are specific to the rural urban interface.
CHAPTER 5. URBAN RESIDENTIAL 3		
6.2. Standards that apply to all permitted activities	Oppose	Oppose lack of development standards on the rural urban interface to recognise and

		protect the adjoining rural production system. As a minimum the plan should develop methods such as setbacks, planting buffers, fencing, non-complaints covenants that are specific to the rural urban interface.
CHAPTER 8. RURAL LIVING ZONE		
8.1. Permitted Activities		
8.2.1.4. The minimum setbacks from property boundaries must be: (a) 6m for a building that is a dwelling; (b) 3m for a building (except a dwelling) that has a gross floor area greater than 15m ² ; (c) 1.5m for a building (except a dwelling) has a gross floor area less than 15m	Oppose	Prefer more generous setbacks to address the interface with rural production activities.
CHAPTER 24. SUBDIVISION		
24.3. Controlled Activities		
Matters over which the Council has reserved control	Oppose	The controlled activity status for all subdivision means applications cannot be declined. The plan is generally reliant on the lot sizes in terms of addressing effects on rural production activities. Oppose the lack of assessment criteria to consider activities in the surrounding environment, reverse sensitivity, proximity of rural production activities, loss of production land and impacts on food supply.
CHAPTER 25. DEFINITIONS		
Agricultural liquid waste means agricultural waste that has a moisture content more than or equal to 95%.	Support in part / Oppose in part	Support clear definitions but caution the use of the term waste which implies an unwanted or unvalued element. Pig manure like poultry manure is a valued resource used in nutrient management to support rural production.
Agricultural solid waste means organic agricultural waste that has a moisture content of less than or equal to 75% and exhibits the	Support in part / Oppose in part	Support clear definitions but caution the use of the term waste which implies an unwanted

properties of a solid, e.g., it can be stacked and hold a definite angle of repose.		or unvalued element. Pig manure like poultry manure is a valued resource used in nutrient management to support rural production.
Agricultural waste means the waste from the customary and generally accepted activities, practices, and procedures that farmers adopt, use, or engage in during the production and preparation for market of poultry, livestock, and associated farm products; and in the production and harvesting of agricultural crops that include agronomic, horticultural, silvicultural and aquaculture activities.	Support in part / Oppose in part	Support clear definitions but caution the use of the term waste which implies an unwanted or unvalued element. Pig manure like poultry manure is a valued resource used in nutrient management to support rural production.
Domestic livestock means livestock bred, reared and/or kept on the property for home consumption, or as pets, or for hobby purposes and from which little or no income is derived.	Support in part / Oppose in part	In other plans NZPork had sought a clearer definition for domestic situation as follows: <u>Domestic livestock Includes the keeping, breeding or rearing of five (5) or fewer pigs that have been weaned, or more than two (2) sows (with progeny until weaned).</u>
Farming means a land based activity, having as its primary purpose the commercial production and sale of any livestock or vegetative matter. Farming does not include intensive farming, forestry, and in the case of vegetative matter, does not include the processing of farm produce beyond cutting, cleaning, grading, chilling, freezing, packaging and storage of produce grown on the farming unit.	Support in part / Oppose in part	The definition of farming should include: <u>Outdoor (Extensive) Pig Farming.</u>
Intensive farming means any primary production activity exhibiting two or more of the following characteristics: (a) little dependence on the quality of the soils of the site, such as greenhouses, mushrooms, plant nurseries; (b) in excess of 50% coverage in permanent buildings having concrete or otherwise impervious floors for the housing and growing of livestock and/or vegetative matter; (c) substantial environmental control and/or modification to facilitate	Oppose	Add new definition. <u>Intensive farming</u> <u>means the commercial raising and keeping of animals and/or plants which is dependent on a high input of food including but not limited to cut pasture and/or supplementary meal or fertiliser throughout the year from beyond the holding, and is contained in buildings or outdoor enclosures.</u>

<p>growth of livestock and/or vegetative matter;</p> <p>(d) high output of collected waste material per hectare and includes all pig farming, poultry farming, rabbit farming; greenhouses not relying on the soils, mushrooms, container growing nursery; and</p> <p>(e) land based aquaculture</p>		<p><u>It includes, but is not limited to</u></p> <p>•</p> <p>•</p> <p>•</p> <p><u>the keeping of pigs outdoors without groundcover being maintained.</u></p>
<p>New definition</p>		<p>Add new definition.</p> <p><u>Outdoor (extensive) pig farming</u></p> <p><u>means an area of a SITE where all pigs, boar, and piglets are contained within a paddock/s with groundcover maintained.</u></p>