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**Environment Canterbury
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29 May 2015

RE: COMMENTS ON THE LAND USE RECOVERY PLAN REVIEW

Silver Fern Farms has welcomed the opportunity to provide comment on the Land Use Recovery Plan (LURP) Review.

Silver Fern Farms operations in Christchurch include the Belfast and Islington meat processing sites, as well as the Canterbury cool store and Vital Pet Food operations. The Belfast Plant was established at its current site in 1883 and it employs 415 people at the peak of the season.

The policy and planning framework outlined in the LURP contains actions and outcomes that will have future implications for Silver Fern Farms Christchurch operations; hence our active participation in the current Christchurch City Council Replacement District Plan process.

Silver Fern Farms comments on the LURP Review are outlined in the attached table and cover the following topic areas:

- Direction and Coordination
- Business
- Transport

If you have any questions regarding this matter please contact Martina Armstrong, Environmental Advisor at martina.armstrong@silverfernfarms.co.nz or on 0275329751.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Daryn Jemmett".

**Daryn Jemmett
Group Environmental Manager
Silver Fern Farms Limited**



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| (1) The specific provisions of the review that our comments relate to are: | (2) Our comments are: | (3) We seek the following actions: |
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| <p>Direction and Coordination</p> | <p>While consenting activity statistics may indicate that the majority of consents are being processed within statutory timeframes, this does not necessarily tell the whole story regarding regulatory process efficiency. In Silver Fern Farms experience, obtaining resource consent can be anything but a timely and streamlined process.</p> <p>As residential developments expand into greenfield areas, incompatible land uses and, as a result, nimbyism is being encountered through the consenting process. This can cause significant delays and uncertainty for existing industry.</p> <p>During the consent renewal process, an existing land use, associated with industrial activity should not be threatened by objections from neighbouring property owners if it was there prior to encroaching incompatible development. The uncertainty that this process creates does not support or encourage existing industry.</p> <p>The LURP is not only about opening up opportunities for future development. It is about protecting industry that has made significant contributions to the Christchurch economy over many years and will continue to do so.</p> | <p>Regulatory authorities should be encouraged to use sensible discretion in circumstances where resource consent renewal for an existing activity is being held up during the affected party process.</p> |



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| <p>Business</p> | <p>Industries such as Silver Fern Farms play a significant role in fostering social and economic wellbeing by providing employment and contributing to a diverse and vibrant local and wider economy.</p> <p>The location of Silver Fern Farms' processing plants is strategically important for the servicing of local farmer-suppliers and such established facilities should be properly recognised and provided for.</p> <p>As such, Silver Fern Farms has been actively involved in the Christchurch City Council Replacement District Plan process. The amendments to the proposed plan that were sought by Silver Fern Farms were primarily out to seek protection for established industries from reverse sensitivity.</p> <p>An example of a requested amendment was to the definition of 'noxious or offensive activity'. The original notified plan had used the definition 'noxious or offensive activity' to describe Silver Fern Farms operations, as well as other activities. This terminology is not supportive of our industry and reinforces an image of the meat processing industry that Silver Fern Farms has worked hard to change.</p> <p>The LURP seeks to ensure that there will be sufficient industrial business land to meet long term growth. Therefore it is important that, through the Christchurch City Council Replacement District Plan process, the appropriate provisions are in place to both protect and attract business to industrial zoned land. These provisions include, but are not limited to, compatible zoning and timely development of infrastructure such as roading, power, stormwater controls, and tradewaste pipelines.</p> | <p>Through district plan review processes, established industry should be protected from reverse sensitivity.</p> |
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| <p>Transport</p> | <p>Silver Fern Farms is an export-based industry that requires reliable and efficient freight networks to ensure that product is transported in a timely manner both nationally and internationally.</p> <p>Silver Fern Farms' Belfast operation is adjacent to the proposed Northern Arterial motorway, which is one of the various Roads of National Significance projects in the Canterbury region. The purpose of these roading projects is to improve freight movement to both the Lyttleton Port and Christchurch Airport.</p> <p>However, the NZTA design for the proposed Northern Arterial provides only limited access to the motorway from Belfast Road. Silver Fern Farms will still need to rely on Main North Road for any truck movements from the north, as the current design only allows passage on and off the Arterial south of Belfast Road.</p> <p>Continuing to force heavy traffic onto Main North Road goes against future plans for the Belfast community. There is an opportunity to greatly reduce traffic flows, which will remove the infrastructural barrier that the Main North Road has become and increase amenity values.</p> <p>The LURP seeks to provide an efficient freight network, however roading projects will fall short of this aim if they do not cater for reasonable access on and off the network.</p> | <p>Ensure that the opportunity to build an efficient roading network does not fall short of its long term goals.</p> |
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