

From: [Graeme Mathieson](#)
To: [Mailroom Mailbox](#)
Cc: [Brian Thom](#); [Nick Daniels](#); [Elaine Chapman](#); "[Coxhead JohnD](#)"
Subject: AgResearch Further Submission - Proposed Canterbury Air Regional Plan
Date: Friday, 10 July 2015 2:04:03 p.m.
Attachments: [AgResearch Further Submission - Proposed Canterbury Air Regional Plan \(Final 100715\).pdf](#)

Dear Sir/Madam

On behalf of my client AgResearch Ltd, please find attached a further submission in relation to the Summary of Submissions on the *Proposed Canterbury Air Regional Plan*.

Please contact me with any comments or queries.

Regards - Graeme

Graeme Mathieson | Environmental Consultant | Environmental Management Services

P 09 255 5127 **F** 09 255 5129 **M** 027 220 2640 **W** www.emslimited.co.nz

PO Box 97431, Manukau 2241.

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**FURTHER SUBMISSION IN SUPPORT OF OR OPPOSITION TO SUBMISSIONS
ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN**

TO: Environment Canterbury
PO Box 345
Christchurch 8140

EMAIL: mailroom@ecan.govt.nz

NAME OF SUBMITTER: AgResearch Limited (“AgResearch”)

ADDRESS FOR SERVICE: Graeme Mathieson
Environmental Management Services Ltd
PO Box 97431
MANUKAU 2241
Email: graeme.mathieson@emslimited.co.nz

AgResearch provides its further submission in the following table.

As a further submitter, AgResearch has an interest in the proposals on which it further submits that is greater than the interest of the general public, for the following reasons:

- AgResearch has research facilities in the Canterbury Region (i.e. the Lincoln Research Campus, Lincoln Research Farm and the Winchmore Research Farm), thereby contributing significantly to agricultural research, farming productivity and sustainable economic development.
- Provisions in the Proposed Canterbury Regional Air Plan are of relevance to agricultural research activities (and to farming interests in general).

AgResearch wishes to be heard in support of its submission.

If others make similar submissions, AgResearch would consider preparing a joint case with them at the hearing.

Plan Provisions	Submitter	Submitter Number	Support or Oppose	Reasons
Table 2.1 General Definitions – Definition of “Stock holding area”	Selwyn District Council	pCARP-1107	Oppose in part	<p>Selwyn District Council seeks the following amendments to the definition of “Stock holding area”:</p> <p><i>means an area of land in which the construction of the holding area or stocking density precludes maintenance of pasture or vegetative ground cover, and is used for confining livestock for more than 30 days in any 12 month period or for more than 10 consecutive 24-hour days at any time. For the avoidance of doubt, this definition includes; milking platforms, feedpads, wintering pads, and farm raceways used for stock holding purposes during milking; but excludes sheep and cattle yards constructed on pasture or bare soil.</i></p> <p>AgResearch agrees with deleting “farm raceways used for stock holding purposes” from the definition of “Stock holding area” and agrees with Council’s rationale that it is unlikely that the holding of stock in these areas would be for a sufficient time to warrant concern.</p> <p>AgResearch is opposed to the deletion of the time thresholds in the definition of “Stock holding area” on the basis that the changes would result in an unnecessary broader application of Rules 7.66 and 7.67 potentially capturing stock holding areas used for a short duration that would not warrant concern. For example, the changes could capture “farm raceways used for stock holding purposes” which contradicts the submitter’s request to delete this activity from the definition.</p>
Table 2.1 General Definitions – Definition of “Stock holding area”	Selwyn District Council	pCARP-1108	Oppose in part	<p>As an alternative to the amendments sought to the definition of “Stock holding area” by the submitter (refer pCARP-1107), the submitter states that as the term is only used in Rule 7.66 it could be deleted and the matters addressed in Rule 7.66 specified in the preamble to the conditions.</p> <p>AgResearch agrees with deleting “farm raceways used for stock holding purposes” from the definition of “Stock holding area” and agrees with Council’s rationale that it is unlikely that the holding of stock in these areas would be for a sufficient time to warrant concern.</p> <p>AgResearch is opposed to the deletion of the time thresholds in the definition of “Stock holding area” on the basis that the changes would result in an unnecessary broader application of Rules 7.66 and 7.67 potentially capturing stock holding areas used for a short duration that would not warrant concern. For example, the changes could capture “farm raceways used for stock holding purposes” which contradicts the submitter’s request to delete this activity from the definition.</p>
Rule 7.66	Ashburton District Council	pCARP-896	Support	<p>The submitter seeks to increase the permitted threshold for confinement of cattle from 12 hours to 2 weeks, and exempt structures use for the rearing of juvenile animals from the rule.</p> <p>AgResearch notes Council’s comment that Council conducted significant discussions with industry during variations to its proposed (now operative) District Plan resulting in intensive</p>

Plan Provisions	Submitter	Submitter Number	Support or Oppose	Reasons
				<p>farming being defined as being continuous confinement of more than two weeks (to differentiate true intensive farming (which is likely to generate additional odour) from other, more traditional and less intensive farming practices.</p> <p>AgResearch also agrees with Ashburton District Council’s assessment that structures used for the rearing of juvenile animals (e.g. calf rearing facilities) are relatively low impact so can be exempt from this rule. In this regard it is noted that the definition for “<i>Intensive Livestock Management (Intensive Farming)</i>” in the Ashburton District Plan excludes:</p> <p><i>Buildings used for housing or sheltering animals that are giving birth or raising juvenile stock, where no individual animal is housed or sheltered for more than 3 months in any calendar year.</i></p>
Rule 7.66(2)	Ashburton District Council	pCARP-895	Support	<p>The submitter seeks to amend Condition 2 of Rule 7.66 to provide for reduced separation distances in relation to rural-residential zones. AgResearch agrees with Ashburton District Council’s explanation that the rule does not adequately anticipate that there are differing intensities of residential activity, especially in “peri-urban” areas where residents might expect greater levels of odour from farming related practices to be apparent than for sites located in traditional, suburban, residential environments.</p>
Rule 7.66(3)	Selwyn District Council	pCARP-1155	Oppose	<p>The submitter seeks to amend Condition 3 of Rule 7.66 as follows:</p> <p><i>The number of cattle housed in that structure has not increased by more than 10% from shall remain the same as at 28th of February or should the number be increased an odour management plan must be prepared to avoid, remedy or mitigate any adverse effects of the increase in the number of cattle housed or held; and</i></p> <p>AgResearch considers that there should be some reasonable flexibility in terms of providing for an increase in the number of cattle housed in existing structures.</p>
Rule 7.67	Ashburton District Council	pCARP-897	Support	<p>Consistent with changes sought to Rule 7.66, the submitter seeks to increase the permitted threshold for confinement of cattle from 12 hours to 2 weeks, and exempt the rearing of juvenile animals from the rule. AgResearch notes Council’s comment that Council conducted significant discussions with industry during variations to its proposed (now operative) District Plan resulting in intensive farming being defined as being continuous confinement of more than two weeks (to differentiate true intensive farming (which is likely to generate additional odour)) from other, more traditional and less intensive farming practices.</p>

Signature: AGRESEARCH LTD

by its authorised agents Environmental Management Services Ltd

A handwritten signature in black ink, appearing to read 'G.J. Mathieson', with a large, sweeping flourish at the end.

G.J. Mathieson

Date: 10th July 2015