

**From:** [Lionel Hume](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Proposed Air Plan  
**Date:** Friday, 10 July 2015 3:08:34 p.m.  
**Attachments:** [FNZ Further Submission Air Plan.pdf](#)

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Dear Sir/Madam,

Attached is Federated Farmers' further submission on the Proposed Canterbury Air Regional Plan.

Yours sincerely,

**LIONEL HUME**  
SENIOR POLICY ADVISOR

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# Federated Farmers of New Zealand

## Further Submission on the Proposed Canterbury Air Regional Plan

10 July 2015



# FURTHER SUBMISSION TO ENVIRONMENT CANTERBURY ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

## Form 6

Further submission in support of, or in opposition to, submission on publicly notified  
proposed policy statement or plan

*Clause 8 of First Schedule, Resource Management Act 1991*

To: *Canterbury Regional Council  
PO Box 345  
Christchurch 8140*

Name of further submitter: Combined Canterbury Provinces, Federated Farmers of New  
Zealand

Contact person: Dr Lionel Hume  
Senior Policy Advisor

Address for service: PO Box 414, Ashburton 7740 or lhume@fedfarm.org.nz

This is a further submission in response to submission/s made on the following: Proposed  
Canterbury Air Regional Plan.

The following pages detail the specifics in relation to our support or opposition to various  
submissions lodged. Our further submissions include the particular parts of each submission  
supported or opposed alongside our reasons for that position and what decision we seek from the  
local authority.

Federated Farmers wishes to be heard in support of its further submission.

### **Note to person making further submission**

A copy of your further submission must be served on the original submitter within 5 working days  
after making the further submission to the local authority.

Where Federated Farmers submitted on the same variation point as any other submitter it stands by its original submission.

This Further Submission provides Federated Farmers views on points raised by other submitters.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Selwyn District Council	pCARP-387	Introduction, p 1-3	Support	The requested terminology is more accurate.
Horticulture NZ	1054	Introduction, p 1-1	Support	Rural production activities need to be provided for.
Horticulture NZ	1056	Introduction, p 1-7	Support	The requested amendment is a useful addition to the discussion about avoidance of reverse sensitivity effects.
Selwyn District Council	1107	General Definitions Table 2.1	Oppose in part	<p>Selwyn District Council seeks the following amendments to the definition of “<i>Stock holding area</i>”:</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>Federated Farmers agrees with deleting “<i>farm raceways used for stock holding purposes</i>” from the definition of “<i>Stock holding area</i>” 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>However, we are opposed to the deletion of the time thresholds in the definition of “<i>Stock holding area</i>” because 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 “<i>farm raceways used for stock holding purposes</i>” which contradicts the submitter’s request to delete this activity from the definition.</p>
Selwyn District Council	1108	General Definitions Table 2.1	Oppose in part	<p>As an alternative to the amendments sought to the definition of “<i>Stock holding area</i>” 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>Federated Farmers agrees with deleting “<i>farm raceways used for stock</i></p>

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
				<i>holding purposes</i> ” from the definition of “ <i>Stock holding area</i> ” 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. However, we are opposed to the deletion of the time thresholds in the definition of “ <i>Stock holding area</i> ” because 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 “ <i>farm raceways used for stock holding purposes</i> ” which contradicts the submitter’s request to delete this activity from the definition.
New Zealand Manufacturers and Exporters Association	250	How the Plan Works 3	Support	For the reasons given by the original submitter.
Balance Agri-Nutrients Ltd	2182	Objectives 5	Support	For the reasons given by the original submitter.
Selwyn District Council	1112	Objective 5.4	Support	Recognises the reality that human activities will have effects, however well managed.
Fonterra Cooperative Group	707	Objective 5.9	Support	For the reasons given by the original submitter.
Selwyn District Council	1116	Policy 6.1	Support	For the reasons given by the original submitter. It is generally not possible to avoid <u>all</u> effects.
Horticulture NZ	1073	Policy 6.7	Support	This is a rational approach to avoiding reverse-sensitivity issues.
Synlait Milk Ltd	2425	Policy 6.10	Support	For the reasons given by the original submitter. Best practicable option is the best that can reasonably be expected.
Fonterra Cooperative Group	716	Policy 6.11	Support	For the reasons given by the original submitter. Large-scale industrial and trade activities are important to the regional economy.
Fonterra Cooperative Group	718	Policy 6.14	Support	For the reasons given by the original submitter. The policy is not necessary.
Mrs Carey Barnett – Alistair and Carey Barnett	1218	Policy 6.15	Support	For the reasons given by the original submitter.
Horticulture NZ	1084	Rule 7.3	Support	Discretionary activity status would enable all relevant aspects to be

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
				considered, including what/who is beyond the property boundary and how far from the boundary it/they are.
Mr Ben Ede	91	Outdoor burning	Oppose	The burning of crop residue and other vegetation is an essential part of rural activities and can be done without significant adverse effects.
Ms Shirley Harris	1033	Outdoor burning	Oppose	The burning of a variety of materials is an essential part of rural activities and can be done without significant adverse effects.
Mrs Carey Barnett – Alistair and Carey Barnett	1225	Rule 7.8	Support	A separate smoke management plan should not be required if smoke management is included in the Farm Environment Plan.
Mrs Carey Barnett – Alistair and Carey Barnett	1226	Rule 7.8	Support	A separate smoke management plan should not be required if smoke management is included in the Farm Environment Plan.
Mrs Carey Barnett – Alistair and Carey Barnett	1227	Rule 7.8	Support	A separate smoke management plan should not be required if smoke management is included in the Farm Environment Plan.
Mrs Carey Barnett – Alistair and Carey Barnett	1254	Rule 7.9	Support	Federated Farmers is opposed to Crop Residue Burning Buffer Areas.
Sally and Ben Hope and Woollcombe – Sally Hope and Ben Woollcombe	2299	Rule 7.9	Oppose	The ability to burn crop residues must be retained because there are sound agronomic reasons for doing so.
Horticulture NZ	1087	Rule 7.10	Support	The requested amendment addresses the environmental issue and recognises the importance of wind direction.
Horticulture NZ	1088	Rule 7.10	Support	Support the change of distance if our submission to delete the condition is not accepted.
Selwyn District Council	1141	Rule 7.10	Support	The requested amendment directly addresses the environmental issue.
Selwyn District Council	1142	Rule 7.10	Support	The requested amendment may facilitate a more efficient burn.
Selwyn District Council	1143	Rule 7.10	Support	Support because it is consistent with our submission on Rule 7.4 and for the reasons given in that submission. However, acceptance of this submission would not remove the need to amend Rule 7.4 as requested by Federated Farmers.
Mrs Carey Barnett – Alistair and Carey Barnett	1231	Rule 7.10	Support	The condition needs to be deleted if not satisfactorily amended as requested in our submission.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Waimakariri District Council	1530	Rule 7.10	Support	The requested amendment directly addresses the environmental issue.
Transpower NZ Ltd	2837	Rule 7.10	Oppose	A 100 m setback is onerous and not necessary to protect grid lines or sub stations.
Mr Vincent Scully	131 – 134 & 136 - 139	Rule 7.48	Oppose	Un-workable and/or unnecessarily prescriptive.
Mr Vincent Scully	142	Rule 7.49	Oppose	Unlikely to be effective and takes no account of who/what is beyond the boundary.
Ashburton District Council	892	Rule 7.66	Support in part	In the event that the rule is not deleted (as requested in our submission), we support the concept of the setback being from a sensitive activity. We also continue to request that the setback be reduced to 250 m, as per our submission.
Ashburton District Council	895	Rule 7.66	Support	Presumably this submission refers to Condition 1 rather than Condition 2? The submitter seeks to amend the Condition to provide for reduced separation distances in relation to rural-residential zones. We agree 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.
Ashburton District Council	896	Rule 7.66	Support	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. Council's comment that it conducted significant discussions with industry during variations to its proposed (now operative) District Plan resulting in intensive farming being defined as being continuous confinement for 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. We agree 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:

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
				<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>
Selwyn District Council	1155	Rule 7.66	Oppose	The submitter seeks to amend Condition 3 of Rule 7.66 as follows: <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> Federated Farmers considers that there should be reasonable flexibility in terms of providing for an increase in the number of cattle housed in existing structures.
Ag Research Ltd	2536	Rule 7.66	Support	Federated Farmers supports the reduced setbacks requested, consistent with its own submission.
Ashburton District Council	897	Rule 7.66	Support	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. We note Council's comment that it conducted significant discussions with industry during variations to its proposed (now operative) District Plan resulting in intensive farming being defined as being continuous confinement for 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.
Selwyn District Council	1156	Rule 7.67	Oppose	Oppose consistent with our further submission on submission point 1155.
Mrs Carey Barnett – Alistair and Carey Barnett	1235	Schedule 2	Support	Burning is an essential part of farming operations.
Mrs Carey Barnett – Alistair and Carey Barnett	1238	Schedule 2	Support	Links the requirement to manage smoke emissions with relevant Farm Environment Plan provisions.
Mrs Carey Barnett –	1241	Schedule 3	Support	Support the ability for a smoke management plan to form part of a Farm



Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Alistair and Carey Barnett				Environment Plan.
Mrs Carey Barnett – Alistair and Carey Barnett	1232	Schedule 2	Support in part	Support the option for smoke management provisions to form part of a Farm Environment Plan.
Mrs Carey Barnett – Alistair and Carey Barnett	1252	Crop Residue Burning Buffer Area Map Series 11	Support	Consistent with our submissions throughout the proposed plan to remove reference to Crop Residue Burning Buffer Areas.

## Conclusion

Federated Farmers thanks Environment Canterbury for the opportunity to further-submit on the Proposed Canterbury Air Regional Plan. We look forward to ongoing dialogue about the plan and continuing to work constructively with Council.



Willy Leferink  
Chair, Canterbury Regional Policy Committee  
Mid Canterbury Provincial President  
Federated Farmers of New Zealand