

**From:** [Melanie Foote](#)  
**To:** [Nancy Bonner](#)  
**Subject:** Lincoln University Submission  
**Date:** Wednesday, 15 July 2015 9:05:38 a.m.  
**Attachments:** [image001.png](#)  
[Further Submission-LU-LU033-FINAL-mf.pdf](#)  
[Further Sub Table. PCARP-LU033-FINALmf.pdf](#)

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Hi Nancy

Please find attached the amended submission.

The perils of overwriting previous submissions!

The Orion submission is all good.

Regards

Melanie



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**Please note I work Monday, Wednesday and Friday**

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**FURTHER SUBMISSION ON PROPOSED CANTERBURY REGIONAL AIR PLAN UNDER CLAUSE 8 OF THE  
FIRST SCHEDULE TO THE RESOURCE MANAGEMENT ACT 1991**

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**TO:** The Proposed Canterbury Regional Air Plan  
Environment Canterbury  
PO Box 345  
Christchurch 8140  
*Submission lodged by email – [mailroom@ecan.govt.nz](mailto:mailroom@ecan.govt.nz)*

**FURTHER SUBMISSION BY:** Lincoln University

**SUBMITTER ADDRESS:** Lincoln University  
PO Box 85084  
Lincoln 7647

*Please note the different address for service below.*

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**INTRODUCTION**

1. This further submission is made by Lincoln University.
2. Lincoln University makes specific further submissions on the Proposed Canterbury Regional Air Plan as set out in **Appendix One**.
3. In accordance with Clause 8(1)(b) of the First Schedule of the RMA Lincoln University has an interest in the Proposed Canterbury Regional Air Plan greater than the interest of the general public.

**HEARING**

4. Lincoln University wishes to be heard in support of its further submissions.
5. If others make similar submissions, Lincoln University will consider presenting a joint case with them at the hearing.

Further submission signed for and on behalf of Lincoln university.



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10 July 2015

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Appendix 1: Further Submission Table

Plan Provisions	Submitter	Submission Reference	Point	Support or Oppose	Further Submission and 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>Lincoln University 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>Lincoln University 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	<a href="#">pCARP-1108</a>		Oppose in part	<p>As an alternative to the amendments sought to the definition of “Stock holding area” by the submitter (refer <a href="#">pCARP-1107</a>), 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>Lincoln University 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</p>

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				<p>areas would be for a sufficient time to warrant concern.</p> <p>Lincoln University is opposed to the deletion of the time thresholds in the definition of “<i>Stock holding area</i>” 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 “<i>farm raceways used for stock holding purposes</i>” which contradicts the submitter’s request to delete this activity from the definition.</p>
Rule 7.66	Ashburton District Council	<a href="#">pCARP-896</a>	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. Lincoln University 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> <p>Lincoln University 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	<a href="#">pCARP-895</a>	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. Lincoln University 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</p>

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				apparent than for sites located in traditional, suburban, residential environments.
Rule 7.66(3)	Selwyn District Council	<a href="#">pCARP-1155</a>	Oppose	<p>The submitter seeks to amend Condition 3 of Rule 7.66 as follows:  <i><del>The number of cattle housed in that structure has not increased by more than 10% from</del> shall remain the same as at 28th of February <u>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</u></i></p> <p>Lincoln University 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	<a href="#">pCARP-897</a>	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. Lincoln University 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>