

*Tabled @ Hearing 23.11.15*

**BEFORE INDEPENDENT COMMISSIONERS**

**UNDER**

the Resource Management Act 1991

**IN THE MATTER**

of Public Hearings on the Proposed  
Canterbury Air Regional Plan

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**STATEMENT OF EVIDENCE OF MATTHEW ANTHONY PEACOCKE**  
**23 November 2015**

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## **Introduction**

- 1 My name is Matthew Peacocke and I am a director of Melrose Limited which has 2 dairy farms and an irrigated dairy support block located in Greendale. We have owned the properties for more than 12 years and are currently in the process of building 7 poultry sheds. I have a dual consent for free range and indoor poultry farming and am under contract to Brinks Ltd.
- 2 In addition, through other companies in the North Island I'm involved in beef, dairy, sheep, mixed cropping, 3 poultry farms in the Waikato (a mixture of free range and indoor poultry), and a property development business. In the North Island I am contracted to both Inghams and Brinks.
- 3 I am on the executive committee of the Waikato/Bay of Plenty Chicken Growers' Association, the Brinks Chicken Growers' association and am currently on the executive for the New Zealand Poultry Meat Producers' Society.

## **The Industry**

- 4 One hundred million chickens are processed in NZ each year and 80% of that total is consumed domestically in NZ. There is currently no imported fresh chicken. It is the most efficient way of producing protein of any farming system in the world with a feed conversion rate of 1.53 kg of feed per 2.6kg of meat.
- 5 The industry is strong on biosecurity and animal welfare and has a very low environmental footprint. This industry is very important to the NZ economy providing affordable protein to the public.
- 6 I am very aware of the effects generated from farming and I consider that the anticipated odour, dust, visual, noise and other effects associated with all types of animal farming are entirely appropriate within the rural zone. I accept that poultry farming involves the establishment of large buildings which have specific effects. Large buildings are also common on modern dairy and goat farms. Any effects of those buildings are usually controlled by District Councils through their district plans.

## **Philosophy**

- 7 In my view the normal effects of farming should be permitted within the rural zone but with reasonable performance standards to ensure that there is an acceptable level of

amenity between neighbours. Where poultry farms are not located in the rural zone, their effects on amenity will be controlled through the district plans as they are unlikely to be permitted activities and will need a resource consent.

- 8 All types of farming give rise to odour and dust effects from time to time. Horticulture gives rise to dust effects particularly at ploughing and planting time and for the few weeks until small plants germinate and grow. Grain production gives rise to dust at harvesting. Most types of farming involve the periodic spread of fertiliser which again can give rise to dust from the fertiliser itself and/or from any vehicles spreading it.
- 9 Animal farming can give rise to dust from yards or the use of races and again from vehicles on the site. Poultry farming can give rise to some dust on the days when the sheds are cleaned out. That might be once every two months at the end of a six to seven week growing cycle. Even then, the level of dust produced is low and certainly lower than what is produced regularly on farms during fertiliser spreading or during harvesting.
- 10 Poultry farms can produce a distinctive odour which is different from the odours associated with dairy farming or sheep farming. In my view it is not an offensive smell, more like chicken feathers and it is certainly not in the same category as the odour that can come from an effluent pond or from an offal pit or from the opening of a silage stack. Again, any poultry odour detectable beyond a boundary is periodic and if it occurs is usually only for two or three mornings during each six to seven week growing cycle when the birds are at their maximum size. That level of odour effect is less than on many dairy farms where the odour from an effluent pond could be consistent and strong.
- 11 I agree with this the approach in this Air Plan, which is to allow free range poultry farming as a permitted activity provided there is compliance with specific standards. In my view, any form of poultry growing that can comply with the same concentration of birds (stocking rate/density) as free range farms should also be permitted because there will be no greater or different effects.
- 12 In particular I note that breeder farms (which are not permitted by this Air Plan), that contain birds which lay eggs for hatching, have a density of five to seven birds/m<sup>2</sup> with a maximum I understand of approximately eight birds/m<sup>2</sup>. At that stocking rate (concentration/density) of birds there are no noticeable effects from the sheds. In the

Waikato, breeder farms require no air discharge consent whatever. There is a reasonably large breeder farm on the banks of the Waikato River in Ngaruawahia which is within a residential zone and has operated there without complaint or problem for many years.

- 13 The Growers' Association, the large meat production companies and PIANZ have been working together to try and produce some industry-wide definitions and rules that we can introduce through the various regional and district plans. At present there is a wide variety of definitions for different types of poultry farming and different rules and set-backs that apply.
- 14 In my view, commercial poultry farming should be the overarching definition and all types of poultry farming should be a permitted activity subject to reasonable performance standards. Where those performance standards are not met a resource consent should be required as with other types of farming.

### **Poultry Growing**

- 15 Modern poultry growing involves different stages. Some farms produce eggs for eating. Some farms produce eggs for hatching. In the meat production business, eggs are taken to a hatchery where they are incubated and then immediately taken to farms when they are one day old. They are released into large sheds onto beds of litter made from wood shavings. In free range farms they stay inside those sheds until it is warm enough and/or the chicks are large enough to survive outside – somewhere between 14 and 21 days, depending on temperature. They are then allowed to go outside during the day where there will be a grassed range area available to them.
- 16 Indoor commercial poultry farms have the birds inside for the entire of their growth cycle. They are able to move freely throughout the shed and, like free range, will be harvested between 28 and 44 days old, when they have reached the required weight.
- 17 Meat poultry farming has changed dramatically. Sheds are computer controlled with fans, heating and automated feed lines, to ensure that the birds are kept in constant conditions. There are new nipple drinking systems, now standard in modern sheds, that allow birds to have constant access to water while preventing spillage onto the

shavings . It is damp litter which can give rise to the distinctive poultry odour together with the concentration of birds as they grow larger.

- 18 Odour effects associated with free range farms are minimal because the birds spend time both in and outside. They particularly like it outside at dawn and dusk.
- 19 All of the sheds are closed for one to two weeks between cycles. Free range sheds may not be cleaned out at the end of each cycle because the litter may not require changing.
- 20 Free range poultry farming has industry standards that limit the density of birds. That density is measured by way of weight/m<sup>2</sup>. The weight measure is used to provide growers flexibility during the cycle so that more birds can be placed in the shed when they are very small in order to improve efficiency and allow other sheds to be cleaned or stay empty.
- 21 The industry, in conjunction with MPI, has an animal welfare standard maximum density of 38kg of live weight/m<sup>2</sup> for indoor poultry farms and with the SPCA, the free range farms are operating at a maximum of 34kg of live weight/m<sup>2</sup>. In the 1980s the maximum was 42kg/m<sup>2</sup>.
- 22 As in any assessment of odour, it is the concentration of the odour producing elements which contribute to the intensity of the odour. The less concentrated, the less odour.

### **Melrose Submission**

- 23 Our submission has commented on a number of issues in the plan.

#### *Free Range Poultry Farming Definition*

- 24 I am generally comfortable with this definition provided that it is clear what is meant by vegetation. If that is the grassed area outside the sheds then I accept that definition. If it refers to screen planting which is commonly established around poultry farms to assist with both odour and dust capture then there needs to be some recognition that the planting takes time to fully establish. I have no difficulty with requiring a grassed outdoor range area for free range or for requiring a vegetative screen to be established as a performance standard.

*Sensitive Activity*

- 25 In my view the definition as it stands is not clear enough. My biggest concern is around the establishment of houses on neighbouring properties after the poultry farm has established.
- 26 I have no difficulty with a performance standard requiring a separation distance of 200m from an existing dwelling when a poultry farm is established. However, poultry farms that need resource consents for an air discharge will need those to be renewed. It is unfair if at renewal the activity status changes because a house has been built within that 200m set-back.
- 27 I do not accept that any type of horticultural plant is a sensitive activity which must be protected from poultry farming.

*Free Range and Low Intensity Poultry Farming*

- 28 As described above where the effects of poultry farming are minimal it should be a permitted activity. If the concentration of birds (stocking rate) is the same or less than for a free range farm then the activity should be permitted whether or not it is indoor or outdoor. In my view, the effects of the poultry farming should be considered not the definition. If the effects are no greater or are less than for a free range farm, then the activity should be permitted.
- 29 For clarity, I consider that free range poultry farming, which is defined in this plan, should be specifically identified as a permitted activity with the performance standards spelt out. Those performance standards should be 200m from an existing dwelling or 50m from the boundary where there is no dwelling within 200m.
- 30 We have chosen the 50m set-back because that is the set-back that exists in the Waipa District Plan. Our permitted rule is modelled on the rule for poultry farming as a permitted activity in Waipa District. Waipa has a rule requiring a 50m set-back from the boundary for any building housing animals. In my view that is not unreasonable provided it applies to all types of animal farming. Where a poultry farm cannot meet the performance standards it falls to become restricted discretionary and the types of assessment criteria set out in the plan should apply.

- 31 We have also proposed that rule 7.62 is amended to clarify that it refers to any new intensive farm. That is just to make it a little easier to understand and apply the rule.

### **Summary**

- 32 I support this plan's approach to identify free range farming as giving rise to no greater or different effects than other types of farming and to leave it as a permitted activity. I urge you to introduce a rule that recognises that any type of free range poultry farming or other poultry farming with the same or lesser odour or dust effects (i.e. having the same or less concentration/stocking rate of birds) should also be permitted.
- 33 I do not see how a Regional Council can regulate a poultry farming activity when it doesn't regulate other similar forms of farming activity. Poultry farming gives rise to no different or greater effects than indoor goat farming or sheltered dairy farming. In my view, it causes fewer adverse effects. Its effluent is significantly less than for dairy or goat farming and is completely removed from the site. Any odour effects from poultry farming occur on an infrequent basis for a couple of days during each six to seven week cycle, if at all. That is not the case for dairy or goat farming.
- 34 In my view, it is not reasonable to regulate a poultry farming activity and to require resource consent, when the spreading of the used poultry litter onto farms by other farmers (horticulture or dairy) as fertiliser, is an entirely permitted activity. It is the same material, the only difference being that the odour from litter spreading is more intense and lasts longer.
- 35 Poultry farming is not a problem that needs to be regulated. It is a normal farming activity.

**Matthew Peacocke**