



25 August 2020

Dear Sir/Madam

Proposed New Plymouth District Plan

Please find attached a further submission from the New Zealand Pork Industry Board (NZPork) on the proposed plan.

NZPork appreciates the opportunity to comment, and we would be pleased to elaborate further on our further submission. Please contact me in the first instance via the details below.

Yours sincerely

A handwritten signature in black ink that reads 'Hannah Ritchie'.

Hannah Ritchie

Senior Environmental Advisor
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FURTHER SUBMISSION ON Proposed New Plymouth District Plan

TO: New Plymouth District Council
Private Bag 2025
New Plymouth
4340

SUBMITTER: NZ Pork Industry Board

CONTACT DETAILS:

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NZPork is not a trade competitor who could gain an advantage in trade completion through this submission.

NZPork wishes to speak at the hearing on this submission. If others make a similar submission, we will consider presenting a joint case with them at a hearing.

I am authorised to act and represent NZ Pork in making this submission.

Hannah Ritchie

25 August 2020

**NZ PORK
NEW PLYMOUTH DISTRICT COUNCIL - PROPOSED NEW PLYMOUTH DISTRICT PLAN
FURTHER SUBMISSION**

| Submitter | Submission Point | Support / Oppose | Reasons for support or opposition are | I seek that the whole (or part) of the submission be allowed (or disallowed) for the details below |
|---------------------------------------|-------------------------|-------------------------|---|---|
| Climate Justice Taranaki Incorporated | 311.55 | Oppose | <p>The submitter has concerns about the RPROZ chapter and the importance given to, amongst other things, industrial agricultural activities especially intensive poultry and pig farming. They request the Plan acknowledges and have regard to new imperatives rather than adhering to the status quo.</p> <p>The submitter asserts that intensive pig farming is not sustainable environmentally, socially or economically, however have provided no evidence to support this claim.</p> <p>Indoor pig farming methods have many sustainable traits, including:</p> <ul style="list-style-type: none"> • The ability to capture nutrient-rich effluent produced by pigs in buildings and reuse it as a natural fertiliser, either on piggery land or neighbouring farms. This reduces the need for synthetic fertiliser inputs on farms in the district. • A high degree of control over nutrient application to land, reducing risk of runoff and leaching losses to the environment. • The re-use of waste food (such as expired supermarket products) and by-products as pig feed in commercial piggeries, diverting waste from landfill. | Disallow the submission in part |

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| | | | <ul style="list-style-type: none"> • Very low greenhouse gas emissions compared to pastoral farming systems¹. <p>There is an exemplary indoor pig farm based in the New Plymouth district, which was the first farm in the country to install a biogas generator to convert methane emissions from effluent ponds to electricity for use in the piggery building. This has greatly reduced the greenhouse gas emissions from the piggery operation and use of electricity from the grid. The farm is highly regarded within the pork industry as an innovator of sustainable farming and was an award winner at the 2020 Ballance Farm Environment Awards for the Taranaki Region.</p> <p>Indoor pig farming is a sustainable and legitimate land use within the rural production zone and should be valued as such.</p> | |
| Fonterra Farm Source – Aaron Edwards (BTW Company Limited) | 583.54 | Support | The submitter seeks an amendment to recognise activities in direct support of rural activities e.g. farming and agricultural suppliers. NZPork agrees that an activity in direct support of rural activity should be anticipated and acknowledged as appropriate within the rural production zone. However, appropriate standards may be required to avoid competition of rural resources and avoid reverse sensitivity. | Allow the submission -subject to appropriate standards. |
| Federated Farmers Taranaki – Mark Hooper, Provincial President | 564.241 | Support | The submitter seeks an amendment to delete the phrase 'which are innovative and efficient' from the objective on the basis that it is difficult for the Council to know which productive activities are innovative and efficient. NZPork agrees with the submitter, and notes that this is particularly true of pig farming, which is | Allow the submission |

¹ Greenhouse gas emissions in 2018 from swine were estimated at 78.2kt CO₂-e according to the New Zealand's Greenhouse Gas Inventory, 1990 – 2018. By comparison, emissions from dairy cattle were estimated at 18,092.1 kt CO₂-e and sheep at 9,356.9 kt CO₂-e.

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| | | | <p>somewhat of a niche industry in New Zealand agriculture and is often not well understood by regulators and policy makers.</p> | |
| <p>Tegel Foods Limited – John Russell</p> | <p>467.15</p> | <p>Support</p> | <p>The submitter requests Objective RPROZ-02 be amended to include intensive primary production.</p> <p>NZPork interprets the definition of Primary Production as including Intensive Indoor Primary Production, however as Intensive Indoor Primary Production is separately defined in the National Planning Standards and the proposed plan, a specific reference to it within this objective is supported.</p> <p>Intensive Indoor Primary Production Activities, which include indoor pig farming, can only be located within the Rural Production Zone and should be recognised as a legitimate land use within the zone.</p> | <p>Allow the submission</p> |
| <p>Climate Justice Taranaki Incorporated</p> | <p>311.56</p> | <p>Oppose</p> | <p>The submitter seeks that item (4) is deleted as the character and amenity arising from use of the land for intensive indoor farming does not need to be maintained. NZPork opposes this submission, for the reasons provided in relation to submission point 311.55. Intensive indoor farming is a sustainable, legitimate and long-established land use within the district.</p> | <p>Disallow the submission in part</p> |
| <p>Tegel Foods Limited – John Russell</p> | <p>467.16</p> | <p>Support</p> | <p>The submitter requests Objective RPROZ-04 (Rural Character) be amended to include intensive primary production.</p> <p>NZPork interprets the definition of Primary Production as including Intensive Indoor Primary Production, however as Intensive Indoor Primary Production is separately defined in the National Planning Standards and the proposed plan, a specific reference to it within this objective is supported.</p> | <p>Allow the submission</p> |

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| | | | Intensive Indoor Primary Production Activities, which include indoor pig farming, can only be located within the Rural Production Zone, and so form a fundamental part of the zone's character. | |
| Fonterra Farm Source – Aaron Edwards (BTW Company Limited) | 583.20 | Support | The submitter seeks an amendment to include and recognise commercial service activities that are supporting rural activities to form part of rural character. NZPork agrees that an activity in direct support of rural activity should be anticipated and acknowledged as appropriate within the rural production zone. However, appropriate standards may be required to avoid competition of rural resources and avoid reverse sensitivity. | Allow the submission subject to appropriate standards. |
| Climate Justice Taranaki Incorporated | 311.57 | Oppose | The submitter seeks an amendment to encourage sustainable alternatives to intensive indoor farming within the district. NZPork opposes this submission, for the reasons provided in relation to submission point 311.55. Intensive indoor farming is a sustainable, legitimate and long-established land use within the district. | Disallow the submission |
| Tegel Foods Limited – John Russell | 467.19 | Support | The submitter seeks amendment to objective RPROZ-O5 to include reference to intensive primary production As above, NZPork interprets the definition of Primary Production as including Intensive Indoor Primary Production, however as Intensive Indoor Primary Production is separately defined in the National Planning Standards and the proposed plan, a specific reference to it within this objective is supported. | Allow the submission |

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| <p>Federated Farmers Taranaki – Mark Hooper, Provincial President</p> | <p>564.227</p> | <p>Support</p> | <p>The submitter raises concerns that the reference to 'intensification of land use' could be interpreted to relate to farming intensification including increasing stocking rates. This is a relevant concern for pork production the district too, as it is defined as an intensive industry under the plan and any new farms or expansion of existing farms could be interpreted as an intensification of land use.</p> <p>NZPork agrees that the objective would be improved through clarification that 'land use' means residential and commercial uses inappropriate for the rural production zone</p> | <p>Allow the submission</p> |
| <p>Tegel Foods Limited – John Russell</p> | <p>467.20</p> | <p>Support</p> | <p>The submitter seeks amendment to objective RPROZ-O7 to include reference to intensive primary production</p> <p>As above, NZPork interprets the definition of Primary Production as including Intensive Indoor Primary Production, however as Intensive Indoor Primary Production is separately defined in the National Planning Standards and the proposed plan, a specific reference to it within this objective is supported.</p> | <p>Allow the submission</p> |
| <p>Airbnb – Louise Trevena-Downing</p> | <p>316.19</p> | <p>Oppose</p> | <p>The submitter seeks that RPROZ-P1 (compatible rural activities) include residential visitor accommodation and homestays</p> <p>NZPork does not agree that visitor accommodation and homestays are an appropriate or compatible land use within the rural production zone. The zone is a production-oriented working environment that is characterised by rural activities.</p> <p>There is a strong potential for reserve sensitivity effects arising from visitor accommodation adjacent to intensive farming activities, in which visitors may have unrealistic expectations of the character of a rural production environment, which includes the sights, sounds and smells associated with rural activities.</p> | <p>Disallow the submission</p> |

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| | | | <p>Home- owners renting rooms or properties as visitor accommodation may also be less tolerant of the effects of rural production activities affecting guest experience.</p> <p>This would not meet objective RPROZ-O3: The role, function and predominant character of the Rural Production Zone is not compromised by incompatible activities.</p> <p>Visitor accommodation should remain an incompatible activity under policy RPROZ-P3.</p> | |
| Tegel Foods Limited – John Russell | 467.21 | Support | <p>The submitter seeks that intensive indoor primary production be listed as a compatible rural activity within the RPROZ.</p> <p>This aligns with NZPork’s original submission on this policy. Indoor farming is an established activity in the NZ rural production system that requires a rural location to operate and should be expected to occur within the rural production zone. Intensive pig farming operations working to industry good management practice standards should not create environmental effects beyond what should typically be expected from a farming operation in the Rural Production Zone.</p> | Allow the submission |
| Fonterra Farm Source – Aaron Edwards (BTW Company Limited) | 583.23 | Support | <p>The submitter considers commercial service activities that support rural activities should be reasonably anticipated in the RPROZ.</p> <p>NZPork agrees that an activity in direct support of rural activity should be anticipated and acknowledged as appropriate within the rural production zone. However, appropriate standards may be required to avoid competition of rural resources and avoid reverse sensitivity.</p> | Allow the submission subject to appropriate standards |

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| Tegel Foods Limited – John Russell | 467.22 | Support | <p>This submission aligns with NZPork’s original submission, that intensive indoor primary production activities should not be a ‘potentially compatible activity’ within the rural production zone. Indoor farming is an established activity in the NZ rural production system that requires a rural location to operate. Intensive pig farming operations working to industry good management practice standards should not create environmental effects beyond what should typically be expected from a farming operation in the Rural Production Zone.</p> <p>NZPork supports the submission to delete the requirement to internalise effects within the site from this policy. Intensive farming activities, like many other rural production activities, produce sights, sounds and smells that are characteristic of the rural environment. The extent to which these characteristics will travel beyond the property boundary is difficult to predict and will vary due to climatic conditions, the time of year and activities occurring on site. It is unrealistic to expect that no effects will occur beyond the property boundary at all times, and unnecessary in a rural production environment which is characterised by the effects of rural production activities.</p> | Allow the submission |
| Climate Justice Taranaki Incorporated | 311.60 | Oppose | <p>The submitter seeks policy RPROZ-P3 be amended to include intensive indoor animal farming as incompatible activities within the rural production zone.</p> <p>NZPork does not agree that intensive indoor primary production is incompatible within the rural production zone. Indoor farming is an established activity in the NZ rural production system that requires a rural location to operate and should be expected to occur within the rural production zone.</p> | Disallow the submission in part |

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| | | | Intensive pig farming operations working to industry good management practice standards should not create environmental effects beyond what should typically be expected from a farming operation in the Rural Production Zone | |
| Horticulture New Zealand – Jordyn Landers | 457.60 | Support | The submitter supports policy RPROZ-P6 but considers it should include the word 'existing' to account for potential reverse sensitivity once rural activities are established. NZPork agrees that this is an important distinction to prevent constraints being placed on established agricultural activities from new sensitive activities. | Allow the submission |
| Te Kotahitanga o Te Atiawa Trust - Hemi Sundgren | 459.275 | Oppose | The submitter requests changes to Policy RPROZ-P6 to ensure tangata whenua are consulted on the design and location of all primary production activities, to identify if an activity may compromise cultural, spiritual and/or historic values and interests or associated of importance to tangata whenua. NZPork supports the wording of this policy as notified; that is that consultation should be undertaken if cultural, spiritual and/or historic values and interests or associated of importance to tangata whenua may be comprised. We do not believe a default consultation requirement in all circumstances is appropriate or necessary. | Disallow the submission in part |
| Tegel Foods Limited – John Russell | 467.25 | Support | NZPork agrees with the submitter to remove the reference to 'large-scale' from this policy as it has no reference point to determine when an activity falls into this category. | Allow the submission |
| Federated Farmers Taranaki – Mark Hooper, Provincial President | 564.230 | Support | NZPork agrees with the submitter to remove the reference to 'large-scale' from this policy as it has no reference point to determine when an activity falls into this category. | Allow the submission |

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| Tegel Foods Limited – John Russell | 467.23 | Support | <p>The submitter requests policy RPROZ-P7 (reverse sensitivity effects) be amended so that it applies to intensive primary production.</p> <p>As above, NZPork interprets the definition of Primary Production as including Intensive Indoor Primary Production, however as Intensive Indoor Primary Production is separately defined in the National Planning Standards and the proposed plan, a specific reference to it within this policy is supported.</p> | Allow the submission |
| Airbnb – Louise Trevena-Downing | 316.22 | Oppose | <p>The submitter requests the inclusion of a new rule that provides for Homestays as a permitted activity in the rural production zone.</p> <p>NZPork does not agree that visitor accommodation and homestays are an appropriate or compatible land use within the rural production zone. The zone is a production-oriented working environment that is characterised by rural activities.</p> <p>There is a strong potential for reserve sensitivity effects arising from visitor accommodation, in which visitors may have unrealistic expectations of the character of a rural production environment, which includes the sights, sounds and smells associated with rural activities. Home- owners renting rooms or properties as visitor accommodation may also be less tolerant of the effects of rural production activities affecting guest experience.</p> <p>This would not meet objective RPROZ-O3: The role, function and predominant character of the Rural Production Zone is not compromised by incompatible activities</p> | Disallow the submission |
| Nicki Smith | 21.1 | Oppose | The submitter opposes limits on residential visitor accommodation in the rural production zone. | Disallow the submission |

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| | | | <p>NZPork supports restrictions on residential visitor accommodation in the rural production zone. Visitor accommodation and homestays are not an appropriate or compatible land use within the rural production zone. The zone is a production-oriented working environment that is characterised by rural activities.</p> <p>There is a strong potential for reserve sensitivity effects arising from visitor accommodation adjacent to intensive farming activities, in which visitors may have unrealistic expectations of the character of a rural production environment, which includes the sights, sounds and smells associated with rural activities. Home- owners renting rooms or properties as visitor accommodation may also be less tolerant of the effects of rural production activities affecting guest experience.</p> <p>This would not meet objective RPROZ-O3: The role, function and predominant character of the Rural Production Zone is not compromised by incompatible activities</p> | |
| Horticulture New Zealand – Jordyn Landers | 457.55 | Support | <p>The submitter opposes standard RPROZ-S6 (maximum gross floor area) as the 250m² standard for all other buildings is too restrictive and should be deleted.</p> <p>This aligns with NZPork’s original submission. The Rural Production Zone is designed for rural production activities, which by their nature will generally include larger buildings. The character of the zone is described in the proposed plan as including “barns and sheds, or larger, more numerous buildings of industrial scale and appearance”.</p> | Allow the submission |

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| | | | This standard creates a conflict by providing zoning for rural production activities then creating provisions to restrict rural production activities within the zone. | |
| Tegel Foods Limited – John Russell | 467.51 | Support | <p>The submitter opposes standard RPROZ-S6 (maximum gross floor area) as they consider that intensive primary production now requires sites to have larger floor areas than 6000m² per site.</p> <p>NZPork agrees, as this is also the case for pork production activities, and notes that no justification has been provided as to how this limit has been arrived at or why it is necessary in the Rural Production Zone.</p> | Allow the submission |
| Tegel Foods Limited – John Russell | 467.2 | Support | <p>The submitter requests that free-range poultry farming be deleted from rural industry nesting table.</p> <p>NZPork requests that free-range pig farming also be deleted from the rural industry nesting table and be placed in the primary production nesting table as ‘outdoor pig farming’, as follows:</p> <p>Primary production:</p> <ul style="list-style-type: none"> • Aquaculture. • Agricultural, pastoral horticultural activities: <ul style="list-style-type: none"> ○ Agriculture, pastoral/livestock farming, <u>outdoor pig farming</u>, dairying and horticulture... <p>Indoor pig farming is separately defined under Intensive Indoor Primary Production.</p> <p>The definition of rural industry is an industry or business undertaken in a rural environment that directly supports, services, or is dependent on primary production. However,</p> | Allow the submission |

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| | | | <p>outdoor pig farming is a primary production activity, not a support activity.</p> <p>We request a change in definition from ‘free-range pig farming’ to ‘outdoor pig farming’ as this covers both ‘free-range’ and ‘free-farmed’ outdoor systems.</p> <p>Free range means the breeding sows and boars live outdoors for their whole life, provided with shelter and protection from the elements. The sows give birth in individual huts, which they can move in and out of freely. Newly weaned pigs may be kept for a short period in a fenced outdoor pen with a shelter, before they are fully transitioned for rearing outdoors during the grower-finisher period. There are less than 5 commercial free-range pig farms currently operating in New Zealand.</p> <p>Most outdoor farms operate a ‘free farmed system’, in which there is an outdoor-based breeding herd, and an indoor-based housing system for growing pigs. The breeding sows and boars live outdoors for their whole life, provided with shelter and protection from the elements. The sows give birth in individual huts, which they can move in and out of freely. After weaning, pigs are raised in barns on bedding.</p> | |
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End of submission.