

BEFORE THE

West Coast Regional
Council/Te Tai o Poutini
Plan Committee

IN THE MATTER OF

Resource Management Act
1991

AND

IN THE MATTER OF

Submissions and Further
Submissions on the Te Tai o
Poutini Plan

Hearing on Rural Zones

**STATEMENT OF EVIDENCE OF LIONEL JOHN HUME AND SIMON CAMERON ON
BEHALF OF THE WEST COAST PROVINCE OF FEDERATED FARMERS OF
NEW ZEALAND**

Dated 1 July 2024

Introduction

Qualifications and Experience

1. My name is Lionel John Hume. I hold B.Ag.Sc and M.Sc. (First Class Hons) degrees from Massey University and a Ph.D. (Plant Science) from Lincoln University. I am employed as a Senior Policy Advisor, by Federated Farmers, based in Canterbury.
2. I previously worked as a scientist for the Department of Scientific and Industrial Research (New Zealand Soil Bureau/DSIR Land Resources), for 16 years, working in the areas of plant nutrition and soil fertility.
3. I have been a board member of Irrigation New Zealand for over 10 years (2006 – 2018).
4. I am a member of the NZ Institute of Agricultural and Horticultural Science, the NZ Society of Soil Science and the Agronomy Society of NZ.
5. Currently I am a member of Federated Farmers' Regional Policy team and have twenty years experience of working with regional planning processes, including the Canterbury Natural Resources Regional Plan (from submission through to resolution of High Court appeals); development of the Resource Management (Measurement and Reporting of Water Takes) Regulations 2010 and membership of the implementation taskforce for those regulations; the development of catchment-based flow and allocation plans for several Canterbury catchments; the development of the Canterbury Water Management Strategy; the Canterbury Regional Policy Statement and Land and Water Regional Plan processes, including several catchment based limit-setting processes culminating in the establishment of sub-regional plans.
6. Simon Cameron is a beef farmer from Haast. He farms 890 ha of freehold land combined with leased Department of Conservation stewardship land.
7. Simon is currently the West Coast Provincial President of Federated Farmers of NZ. He is also Federated Farmers' National Meat and Wool Vice Chair, West Coast Meat and Wool Chair and the West Coast representative on the Federated Farmers High Country Committee.

8. Simon has considerable experience of balancing farming with caring for the environment. Of the 890 ha of freehold land farmed, 640 ha is in bush and wetland. The farmed land comprises four large river valley blocks (made up of freehold and leased land) which have been managed to maintain the high quality of water leaving those catchments over time.

Rural Zones

Relevant Definitions

Definitions of *Farm Quarry* and *Quarrying*

9. Federated Farmers sought amendment to the definition of *farm quarry* to remove the constraint that excavation and extraction must be for “farming activities on the same site”. We requested removal of the words “on the same site”. The s42A reporting officer supported our submission in part and recommended that the phrase “on the same site” be replaced with the phrase “on the same property”. Although this is not precisely what we requested, it is consistent with our submission which sought that extracted material could be used on the full property or operation from which it is extracted. Therefore, Federated Farmers supports the recommendation of the reporting officer.
10. Further, Federated Farmers requested a new definition of *quarrying*. The reporting officer did not support our submission, on the basis that quarrying is a sub-set of mineral extraction and that there are provisions and definitions that support this topic. Federated Farmers maintains that quarrying is sufficiently different from other forms of mineral extraction to justify its own definition. Therefore, we continue to request a new definition of *quarrying*, as per our submission.

Overview Section

11. Federated Farmers stated that on-farm accommodation for workers is often in close proximity to other dwellings. Therefore, we requested amendment of the description of rural residential environments, as follows:

Rural areas are also residential environments – characterised by lower levels of built development and ~~greater separation distance from neighbours~~.

12. The s42A reporting officer recommended rejection of our submission on the basis that the statement, as notified, is generally true. We maintain that the general truth of the statement is covered by the (notified) statement that there are “lower levels of built development” in rural areas. That statement is generally correct, unlike the statement referring to separation distances, which is incorrect in some instances. Therefore, Federated Farmers continues to seek the amendment requested in its submission.

Objectives

13. Federated Farmers requested a new objective (RURZ-O1 or GRUZ-O1) to explicitly provide for primary production activities and the range of activities that support primary production activities and activities that require a rural location. The s42A reporting officer accepted our submission in part (along with the similar submission from Horticulture New Zealand) and stated that her recommended new objective would partly address the relief sought. Presumably the new objective referred to is the recommended RURZ-O7, which states that the GRUZ is managed to maintain its availability for primary production purposes and to provide long term protection from being compromised by reverse sensitivity.
14. Federated Farmers appreciates that the recommended new objective RURZ-O7 is a step in the right direction but maintains that the objective needs to provide more actively for primary production and associated activities, given the importance of land-based primary production to the economy and social fabric of the West Coast Region and New Zealand as a whole. In this context, it should be noted that land-based primary production contributes about 80% of New Zealand’s merchandise exports¹.
15. Federated Farmers opposed RURZ-O1 in part because the primary focus of the objective was on amenity and rural character values. Maintaining a productive rural working environment appeared to be a secondary consideration. The s42A reporting officer again accepted our submission in part and stated that her recommended new objective RURZ-O7 would partly address the relief sought. Again, we appreciate that the recommended new objective RURZ-O7 is a step in the right direction but continue to maintain that the objective needs to provide more actively for primary production and associated activities. Further, we maintain that a highly productive rural working environment should be the first and foremost objective for the

¹ [international-trade-march-2024-quarter.xlsx \(live.com\)](#)

rural zone in a West Coast and New Zealand context. Therefore, Federated Farmers continues to stand by its submission requesting an amendment to RURZ-O1 or a new GRUZ-O1.

Policies

16. Federated Farmers sought a re-drafting of RURZ-P1 to better focus on the GRUZ and RLZ zones and provide more specific direction about the types of activities that are appropriate for those zones, consistent with the National Planning Standards. We appreciate the reporting officer's support for our proposed redrafted policy, expressing the view that it "is generally superior to that in the proposed plan and links better to the provisions in the rules". Therefore, Federated Farmers supports the recommended amendments to RURZ-P1.
17. Consistent with our own submissions on the RURZ objectives and policies, Federated Farmers supports the recommended new policy RURZ- PXXXX (in response to the submission of Grey District Council) as follows: *Within the General Rural Zone enable primary production activities as the predominant land use, alongside activities that support primary production.*
18. Federated Farmers submitted that RURZ-P2 and RURZ-P3 related to settlements and requested their relocation into the SETZ section. The reporting officer supported our submission in part. She did not recommend relocation of the policies, because it would not be consistent with the structure of the plan but recommended a change of wording to RURZ-P2, specifying that the policy provides specifically for the growth and change of settlements within the SETZ settlement Zone. Federated Farmers supports this recommendation.
19. Federated Farmers requested the amendment of RURZ-P10, to state that the support of tourism and visitor businesses that relate to rural environment should "not adversely effect rural production activities". The s42A reporting officer recommended the acceptance of our submission in part, recommending a slight change in wording (including the removal of a typographical error), as follows: "where these activities do not adversely affect primary production activities". Federated Farmers supports the recommended amendment.
20. Federated Farmers requested the amendment of RURZ-P15 (about reverse sensitivity) to refer to "lawfully established activities" rather than "existing rural uses and consented activities" because the term "lawfully established activities" is a defined term in the plan. Therefore, we support the recommendation of the reporting officer to make the amendment requested.

21. RURZ-P27, as notified, requires the location and operation of airfields and helicopter landing areas within the rural area to be managed to provide for the amenity values of the surrounding rural and settlement areas. Federated Farmers requested that primary production uses be excluded from this requirement (because primary production is the predominant land use within rural areas). Therefore, we support the reporting officer's recommendation to accept our submission with respect to rural areas but not with respect to settlement areas. We appreciate and support the recommendation with respect to rural areas.
22. With respect to settlement areas, the reporting officer recommended rejection of our submission, stating that, in some areas with multiple airfields and landing areas, managing adverse effects on settlement amenity is a significant issue. Federated Farmers appreciates this point but maintains that the operation of aircraft to support primary production is a key activity in rural areas. To address the issue in areas where there are, for example, many tourist flights, a distinction could be made between aircraft activity supporting primary production, and aircraft activity for other purposes. The numbers of flights for primary production purposes are likely to be substantially less overall and much less constant than flights for tourism purposes.

General Rural Zone

23. GRUZ-R3 covers residential activities and residential units in the GRUZ. GRUZ-R3(4) states that there should be no more than 3 minor residential units per 10 ha of net site area. Federated Farmers submitted that primary production farms (depending on size) may require multiple minor residential units for staff accommodation. Consequently, we requested that the permitted number of minor residential units be increased from 3 to 5. The s42A reporting officer did not support our submission, stating that it would result in significantly increased residential activity within the rural environment. She argued that farms are generally of sufficient size to allow sufficient accommodation to be developed. Taking this argument to its logical conclusion, the question arises about whether the development of minor residential units on 2 different blocks of 10 ha is preferable to more units on one block of 10 ha. Federated Farmers suggests that there would be little difference in effect and that there would potentially be greater convenience (e.g. shared infrastructure) if 5 minor residential units were permitted per 10 ha of area. Therefore, we continue to promote our original submission.
24. GRUZ-R21 covers Rural Industry (restricted discretionary activity) and GRUZ-R24 covers Non-rural Activities (also restricted discretionary). Federated Farmers asked that small scale rural industry (maximum floor and yard area 250 m²) be allowed to locate in the GRUZ as a permitted

activity. The s42A reporting officer did not support our submission, on the basis that the proliferation of industry into rural areas (in the absence of stormwater, transport and other infrastructure) is potentially problematic. We appreciate this viewpoint, and the need for adequate safeguards. However, we continue to believe that suitable safeguards could be applied via permitted activity requirements, conditions or permissions.

25. Federated Farmers opposed GRUZ-R24 (discretionary activity) because of its relatively generous provision for location in the GRUZ, particularly a lack of any requirement for a functional need to locate in that zone. We believe that the rule is too permissive given the policy direction that the GRUZ is a location for primary production ahead of other uses. Therefore, we support the recommendation from the reporting officer that GRUZ-R24 be deleted.

Rural Lifestyle Zone

26. RLZ-R1 is a permitted activity rule for agricultural, horticultural and pastoral activities and buildings. There is a list of exclusions which includes stock sale yards and farm quarries. Federated Farmers questioned the need for these two exclusions.
27. With respect to stock sale yards, Federated Farmers used the term “stock yards” in its submission in contrast to the term “stock sale yards” used in RLZ-R1 as notified. There may have been confusion about the distinction between these terms. (This distinction was also pointed out by the s42A reporting officer.) Rural lifestyle blocks definitely need stockyards, for handling stock (e.g. for veterinary care) and loading/unloading etc. We agree that a large sale yard could be problematic because of waste discharge issues, noise etc. Perhaps a definition of stock sale yard is needed. Stock yards will occasionally be used for sale processes (e.g. so that a potential buyer can view stock) without being a sale yard, the main purpose of which is to facilitate the sale of stock. Therefore, if “stock sale yards” are to be an exclusion in RLZ-R1, it must be made crystal-clear that this refers to sale yards specifically built for the purpose of selling stock, by agents on behalf of their clients, and does not include the stock yards used in normal farming operations.
28. With respect to farm quarries, the s42A reporting officer pointed out that the need for farm quarries would be less on lifestyle blocks because of less need for track maintenance etc. In response we argue that there are potential needs on lifestyle blocks, even if less than for large

farms. We continue to maintain that farm quarries should not be an exclusion in RLZ-R1 but should be subject to the requirements and constraints set out elsewhere in this plan.

Conclusion

Federated Farmers thanks the Hearing Panel for the opportunity to present this evidence statement.

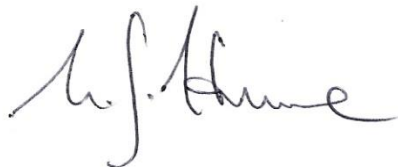
A handwritten signature in black ink, appearing to read 'Simon Cameron', written in a cursive style.

Simon Cameron

President

West Coast Province

Federated Farmers of NZ

A handwritten signature in black ink, appearing to read 'Lionel Hume', written in a cursive style.

Lionel Hume

Senior Policy Advisor

Federated Farmers of NZ