

Concerning intensive rural production:

In my original submission, in comments on SETZ I asked for a cap on rural herd intensity. My comment was probably more suited to GRUZ R1. GRUZ R1 does not address herd intensities but it should.

I said,

'Increasing intensity of farming produces increasingly more noise, odour, flies, traffic etc and these are issues district councils need to address and therefore needs addressing in this Plan'

GRUZ - R1.3 would be the place to address this:

1.3. *The minimum separation distance between buildings housing more than 10 animals or commercial livestock and a residential/settlement/rural lifestyle zone boundary shall be 30m and from any residential building on another site 50m, and from any other boundary 20m;*

i no detectable odour, or fly problem, beyond zone boundaries, for housed and freerange stock.

This would also address my issues with **buffer** zones.

Rules GRUZ - R1.3, RLZ - R1.6, SETZ - R5 need to be looked into in more depth and a consistent set of rules emerge that define animal number thresholds, more logical setback distances, and address the 3 main animal species - cattle, pigs, poultry - separately. (X-ref: RLZ 1.6) Species size, needs, and discharges are vastly different for the different commercial livestock species, and therefore a blanket intensity of 10 animals is inadequate.

Dairy sheds are also not addressed and R1 should be the place to consider dairy sheds. there needs to be setback distances from boundaries for dairy sheds due to noise, odour, flies, traffic etc.

GRUZ - R20 Intensive Indoor Primary Production

S42A@260 S552., S553.184

I requested R20 Discretion restricted to

k number and type of livestock

The S42A report says:

Number and type of livestock will principally impact on issues such as discharges (to air and water) from such a facility and are managed through the regional council framework.

However, adopting the same logic, both

d. Method of effluent management and disposal;

j. Methods of wastewater and stormwater treatment and disposal.

would surely be regional council matters also?

RLZ R1.6 Agricultural, Horticultural and Pastoral Activities and Buildings

S42A@337

BDC (S538.529)

X-ref: GRUZ - R1.3, GRUZ - R20

~~6. Performance standards for poultry farming and pig keeping apply as follows:~~

~~i. For poultry setbacks of 10m from any residential building on another site and 2m from the site boundary;~~

~~ii. For pig keeping setbacks of 50m from any residential building on another site and 100m for any shelter holding 4 or more pigs~~

~~Shelters and buildings used to house or feed poultry or pigs must be setback at least 30m from any boundary;~~

The S42A report says that the proposed amendment simplifies the clause.

I disagree, I consider that pigs and poultry need to be addressed separately as:

- their species size, needs, and discharges are vastly different.
- The amended clause does not distinguish between backyard and commercial keeping of the animals,
- A 30 metre setback on a smaller property may prevent the keeping of that species on the property, especially in relation to poultry.

The deleted amendment needed tweaking also. Intensive poultry farming can be a smelly, flyblown, noisy activity, so 10 metres from another property's residential building is woefully inadequate.

GRUZ R1.3 is much more sensible (although 10 indoor pigs could be an upscale noisy, smelly affair and should have its own clause in GRUZ - R1.3):

RLZ R1.6 needs more work on it to be a viable clause.

SETZ

S42A@43

S552 S553.185

X-ref: GRUZ - R1.3, GRUZ - R20, RLZ - R1.6

My original submission comment:

1 There needs to be a cap on dairy and other intense rural production. Increased nitrates in groundwater, phosphate and nitrate run-off into waterways, effluent run-off especially in the high rainfall of WC, as a result of intensifying dairy is a regional council

issue but also a district council issue when e.g. supplying drinking water and promoting swimmable rivers and beaches. Increasing intensity of farming produces increasingly more noise, odour, flies, traffic etc and these are issues district councils need to address and therefore needs addressing in this Plan.

The S42A report says

The rules already restrict intensive indoor primary production within this zone.

That would be SETZ - R5

This is more suited to RURZ/ GRUZ - R1, but that rule does not address this issue at all.

See my comments for GRUZ - R1

SETZ - R5 Agricultural, Horticultural and Pastoral Activities, Recreational Activities and Conservation Activities

X-ref: Definitions

1 Does this relate only to activities which are a main source of income, or does it include backyard activities that may produce a small income? The definition is not clear; it says

'means the use of land or buildings where the primary purpose is to produce livestock, crops and other agricultural produce that relies on the productive capacity of land, and includes:...'

If it includes backyard then a 30 metre clearance from boundaries would exclude a number of such backyard activities.

Either the definition or this rule needs to clarify this aspect.

Noted that for Residential Zones S42A@63 the planner says:

I also note that the average residential section would have a width of less than 20m

This sizing would also apply to the Settlement Zone.

Noted that the original rule has been changed, via BDC (S538.556) and S42A@104.

There is no explanation for changing the ruling around these setbacks, although no doubt it coincides with Rural Zones S42A: S42A@337 and BDC (S538.529)

To repeat: rules GRUZ - R1.3, RLZ - R1.6, SETZ - R5 need to be looked into in more depth and a consistent set of rules emerge that define animal number thresholds, more logical setback distances, and address the 3 main animal species - cattle, pigs, poultry - separately.

2 The keeping of livestock or pets in residential/ settlement areas is permitted as it is not disallowed. Shouldn't there be rules around the keeping of non-permanently-housed livestock in Settlement Areas? There is the possibility that someone stripfeeds a herd in a settlement zone and it appears no rule would forbid this yet neighbours would be

subjected to all the adverse effects that go along with such an activity. There needs to be a cap on herd/ animal numbers in settlement zones, even if it is to say that no adverse effects on neighbours from animal-keeping in this zone occurs.

R5.2.f no detectable odour, or fly problem, beyond property boundaries, for housed and freerange stock.

SETZ - R5.2

My original submission - no S42A comment, but buffering was addressed in the S42A report for Residential Zones. S42A@63 S552, S553.231

5.2 There should be a 20 m buffer from boundaries for any commercial dairy or other livestock enterprise, especially for intensive outdoor farming. This will buffer odour, contamination, dust, shading and noise from residential properties. This should apply also to other such rules in the plan.

S42A@63 says that other rules cover all aspects of segregating non-residential activities. However things such as cowraces and animal gates in rural zoning have not been addressed. Animal gates have high intensities of animal movement; they are also areas where especially dairy cows, congregate for large amounts of time (waiting to be moved) where high amounts of animal excrement can accumulate, bringing bad odours and flies.

There needs to be a buffer between cowraces and farm gates, and residential/ settlement zones.

This is a really important issue on the West Coast where rural activities are the dominant activity and residential areas are small and most often surrounded by rural zones.

See my Appendix 3 below for a copy of Residential Zones S42A@63 comment on buffer zones

Appendix 3

20m buffer zones - copy of Residential Zones S42A@63

Earlier references:

Residential Zones S42A@63

63. Frida Inta (S553.231) and Buller Conservation Group (S552.231) seek the addition of a new policy setting out that a 20m buffer zone should be provided around the periphery of residential zones to separate these from non-residential activities. I do not support this submission as it relates to non-residential activities within the zone. I consider that provided the non-residential activities meet the required Permitted Activity standards of

the Zone they should be able to establish without the need for a buffer. These standards and specifications for non-residential activities have been developed in order to ensure that a good level of residential amenity is maintained within these areas. I also note that the average residential section would have a width of less than 20m so such a buffer would be impractical. It may be that these submitters are seeking that there be a 20m buffer between a residential and non-residential zone. However I would not support this approach either. I note that all zones other than residential zones are “non-residential” therefore this would effectively restrict any activity within such a buffer. I consider that this matter is already dealt with within the non-residential zones through the requirement for setbacks from boundaries.

Residential-Zones-Final Report S42A@72 (S553.230) RESZ - P5 does not support buffer zones.