



24 February 2014

Selwyn District Council
PO BOX 90
ROLLESTON 7643

Attention Craig Friedel
Facsimile Rolleston

Dear Craig

Consultation on the Draft Rural Residential Strategy
HG Ref: 1020-130103-02

Thank you for the opportunity to comment on the draft Rural Residential Strategy ('dRRS') for the Selwyn District on behalf of the Poultry Industry Association of New Zealand (Inc) ('PIANZ') and the Egg Producers Federation of New Zealand (Inc) ('EPFNZ'). PIANZ and EPFNZ have been involved in previous planning work in this area, including submitting on Plan Changes 17 and 32.

PIANZ and EPFNZ currently represent the following poultry operations in the Selwyn District:

- 5 meat chicken breeders;
- 23 meat chicken growers;
- 2 non-chicken meat breeders;
- 1 processing plant;
- 5 layer farms;
- 1 rearing farm; and
- 1 hatchery.

Aspects Supported by PIANZ and EPFNZ

PIANZ and EPFNZ are supportive of the following aspects of the dRRS:

- That the Living 3 zone is being used as a rural residential zone to accommodate demand for residential development on 1-2ha lots. This will reduce the pressure for residential development on 4ha sites in the Inner Plains zone;
- That intensive farming operations have been included on the constraint maps in Appendix 2 of the dRRS and all poultry farms adjacent to rural townships have been correctly mapped as part of this process;
- That the Rural Residential Criteria listed in Appendix 1 include criteria relating to avoiding reverse sensitivity effects with adjacent rural activities;

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- That all five preliminary rural residential areas identified in the dRRS are not located directly adjacent to any intensive poultry farming activities or within the buffer areas around those activities; and
- That the future timeframe that the dRRS will cover (10-15 years) provides the poultry industry with some medium term certainty that new Living 3 zones will not be approved in any locations adjacent to existing poultry farms.

Suggested Amendments to the dRRS

As mentioned by PIANZ and EPFNZ in previous feedback and submissions on rural residential development in Selwyn, there is still a concern that the introduction of more land zoned Living 3 will result in potential cumulative effects. This is because more rural residential development opportunity will be provided while still allowing 4ha rural lots to be used for residential purposes.

The dRRS identifies that the smallest rural lots allowed in the Inner Plains zone (4ha) are being used as a substitute for rural residential lots as opposed to being retained for productive purposes. The provision of more Living 3 zoned land will alleviate the pressure for smaller lots in rural areas to a certain degree, however the dRRS does not include any provisions to actively discourage the uptake of 4ha rural lots for residential purposes. PIANZ and EPFNZ are concerned that the dRRS has the potential to provide new opportunities for rural residential development in addition to the 4ha lots in rural areas, resulting in more rural residential development than was anticipated for or desired by the Council.

The dRRS should be an all encompassing rural residential strategy, which provides for rural residential development in appropriate places whilst discouraging it in inappropriate places in order to preserve the Inner Plains zone for productive rural activities. The dRRS should signal that a future plan change (either a reworked Plan Change 32 or a new plan change) will revisit the existing minimum lot size in the Inner Plains zone and consider increasing the standard from 4ha to a larger lot size. A larger minimum lot size would discourage further subdivision of productive rural land for purely residential purposes as it would be uneconomical to live on a larger lot without putting it to productive use.

PIANZ and EPFNZ look forward to the opportunity to provide comments on any future plan changes that may arise from the final Rural Residential Strategy that is adopted by Selwyn District Council

Yours sincerely

Harrison Grierson Consultants Limited

Melissa Douché
Senior Planner

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