

## Memorandum

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**To** Selwyn District Council – Tim Hegarty

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**Copy** Eric Rutten

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**From** Christian McDean

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**Office** Hamilton

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**Date** 31/10/24

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**File** Lifestyle Chickens – RC245697

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**Subject** **Additional Information Addendum**

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This additional information is being provided to support the need for two additional dwellings on the property to support the poultry breeder unit proposed for the property.

It is my opinion that the objectives, policies and rules within the Operative and Partially Operative Selwyn District Plans that relate to the number of dwellings per rural site have not been prepared with an intensive poultry breeder operation in mind. Rather they require significant site area i.e. 80ha within the General Rural Zone (PODP) or 40ha within the Outer Plains (ODP) for two dwellings, which you would typically relate to an extensive farming operation e.g. dairying.

This is inconsistent with an intensive farming operation, which in this particular case only requires approximately 5ha to provide a key part of the supply chain for New Zealand's chicken meat industry. Purchasing a site of +80ha (or even +40ha) for a 5ha intensive farm is clearly not a practical solution, just to comply with a District Plan rule.

In both plans, failure to comply with these rules triggers a non complying activity, not a prohibited activity. Which means Council has the ability to consider this proposal from the perspective of an activity that has not been anticipated by the District Plan and is a unique circumstance that would not set a precedent beyond other poultry breeder operations seeking land use consent.

I note the PODP does provide for Intensive Farming provided a 300m setback can be provided to sensitive receptors, so clearly intensive farming has been considered on smaller areas of land. While I appreciate this proposal is unable to meet this requirement, I discuss below the differences in the more frequent broiler poultry farms within the region vs. the breeder farm being proposed here.

As stated above the typical intensive farming operations within the Canterbury Region are poultry broiler farms, which raise meat chickens for up to 40 days and have up to 8 cycles per year. The stocking rate of these sites typically sits at between 15-20 birds/m<sup>2</sup> and the sheds are far less complicated as they have no equipment within the sheds other than feed trays and drinker lines. These sites tend to employ only an owner operator or farm manager with occasional labour for specific tasks.

A poultry breeder farm such as what is being proposed at 227 Hunters Road has a stocking rate of approximately 6 birds/m<sup>2</sup> but does require a larger staff (5-6) due to the egg laying nature of these birds. These birds are in place for approximately 40 weeks where they lay fertilised eggs in specialised laying boxes within the sheds, these are then removed off site daily to a hatchery, where once hatched they are placed into a broiler farm for their <40 day cycle.



The proposal also provides for two separate farming units, with separate staff for each unit of 4 sheds. This is a biosecurity measure to reduce the risk to the supply chain, with the loss of breeder birds having a much larger impact on the supply chain of chicken products than the loss of meat chicken birds given their respective life cycles.

Both units require on site housing in close proximity to the respective 4 shed units. This allows for immediate action should there be a shed or equipment malfunction. This reduces the risk of unnecessary bird mortality or environmental conditions that could possibly result in offsite effects.

The information provided above will hopefully allow you to view this proposal as the unique circumstance it is. By allowing for both the poultry farm and the required on site dwellings no precedent will be set other than for any additional breeder units (of which none can exist within approximately 5km of another breeder farm). This would seem to be a situation that was not anticipated by the respective district plans, but this should not result in a recommendation to decline on the basis of district plan integrity.

