

NZ PORK



SUBMISSION ON:

Proposed Lower Hutt District Plan

May 2025

SUBMITTER: New Zealand Pork Industry Board

Introduction

The New Zealand Pork Industry Board (NZ Pork) welcomes the opportunity to submit on the Proposed Lower Hutt District Plan.

NZ Pork could not gain an advantage in trade competition through this submission.

NZ Pork wishes to be heard in support of our submission and would be prepared to consider presenting our submission in a joint case with others making a similar submission at any hearing.

Contact for service:

Hannah Ritchie
Environment and Planning Manager
New Zealand Pork Industry Board
PO Box 20176
Bishopdale
Christchurch 8543

Email: Hannah.ritchie@pork.co.nz



The New Zealand Pork Industry

NZ Pork is a statutory Board funded by producer levies. It actively promotes “100% New Zealand Pork” to support a sustainable and profitable future for New Zealand grown pork. The Board’s statutory function is to act in the interests of pig farmers to help attain the best possible net on-going returns while farming sustainably into the future.

The New Zealand pig industry is a highly productive specialized livestock sector, well integrated within New Zealand’s primary production economic base. It draws on both downstream and upstream inputs and economic activity from New Zealand’s rural sector including feed inputs, equipment and animal health supply, transport, slaughterhouse facilities plus further processing.

Nationally, there are around about 65 commercial pig farmers, comprising a relatively small livestock sector that is uniquely domestically focused, with a farmgate value of \$186 million (2024 estimate).

Pigs’ needs are unique compared to other farmed animals. They need constant access to shelter, a balanced diet and regular care and supervision. To meet these needs, New Zealand’s commercial pig farmers have adopted a range of farming methods. Many farmers prefer indoor farming because they believe it allows them to provide the best care for the modern animal by allowing them to carefully manage their environment. Approximately 55% of New Zealand’s pigs are farmed in this way. The other 45% of New Zealand’s commercial breeding herd is farmed outdoors. Outdoor breeding (also called free-farmed pork) can only occur in a moderate climate with low rainfall and free-draining soil conditions. In New Zealand, these conditions are mostly found in North Otago and Canterbury. In most free-farmed systems, sows are farmed in groups in paddocks during gestation with huts for shelter and shade. When sows farrow, they are provided with individual, dry and draught-free huts with straw for warmth. A variety of housing systems are then used to house pigs after weaning, including indoor barns or open-air sheds. These may or may not have floors depending on the system and bedding used. They may be fixed or mobile, again dependent on the farming system employed and management practice.

Pig farming is closely integrated with other agricultural systems, with many indoor and outdoor farms operating within larger arable or pastoral enterprises. Outdoor farms commonly use rotational practices, moving pigs across different areas of the farm over several years. After the pigs, arable crops or grazing pasture are sown to make use of the nutrient-rich soil they leave behind. Indoor farming systems often include cropping or pasture areas where piggery effluent is applied as a natural fertiliser, supporting regenerative and circular economic practices.

New Zealand pork producers are facing several economic, social and environmental challenges in order to remain viable. The contribution of imported pork to New Zealand's total pork consumption has increased significantly in recent years, placing further demands on producers who have responded by developing increasingly efficient systems. The Waitaki District is an important district for pig farming, using a mixture of both indoor and outdoor farming systems that support New Zealand's food production system.

The New Zealand pork industry is dedicated to producing environmentally sustainable pork. NZPork is proactive in supporting farmers to reduce environmental impacts through investing producer funds into research, innovation and technologies in a range of environmental areas including nutrient management, greenhouse gas emission reductions and by-product reuse. Pig farmers in New Zealand have a firm grasp of environmental issues and demonstrate a high level of innovation and environmental stewardship. The New Zealand pork industry has committed significant time and resource to Sustainable Farming Fund projects centred on environmental initiatives, including development and implementation of Environmental Guidelines (attached) and Nutrient Management Guidelines. However, profit margins for the industry remain tight and dialogue with farmers has indicated that compliance costs and uncertainty into the future are key issues.

2. Information to support our submission

2.1 Definitions

A wide range of farming and housing systems are used to raise pigs. There are three main styles of commercial pig farming used in New Zealand:

Indoor: During pregnancy sows are housed indoors in groups. When they give birth, they are housed individually in specialist facilities that provide shelter, deliver necessary food and water, enable 24hr animal husbandry, are easy to keep clean, designed to protect piglets, and meet the different temperature requirements of the sow and her piglets.

A variety of housing systems are used to house pigs after weaning. Pigs can thrive in diverse environments which provide shelter from the elements, space, and have access to feed and water. As they grow, their feed and temperature requirements are adjusted to meet their needs. There can be a transition from fully indoor enclosures to more open structures as pigs grow and become accustomed to local environmental conditions.

Indoor pig farms meet the definition of Intensive Indoor Primary Production (IIPP) in the National Planning Standards, a definition developed by MfE in consultation with NZPork to assist with developing consistency in planning frameworks around NZ. The definition is as follows:

Intensive Indoor Primary Production means:

Primary production activities that principally occur within buildings and involve growing fungi, or keeping or rearing livestock (excluding calf-rearing for a specified time period) or poultry.



Image 1: Indoor group dry sows



Image 2: Sow and litter in indoor farrowing facility



Image 3: Indoor group housing for growing pigs on a fully slatted floor

Free farmed: means sows and boars live outdoors for their whole life and, are provided with shelter and protection from the elements. Sows give birth in individual huts, which they can move in and out of freely. After weaning, pigs are raised in barns on bedding.

The qualifier for an IIPP activity is whether the activity *principally* occurs within buildings. In a free-farmed situation, there is a mix of both outdoor and indoor activity such that there might not be clear alignment with the IIPP definition.



Image 4: Sow and litter in an outdoor farrowing paddock, with moveable farrowing huts visible in the background.



Image 5: indoor group housing for weaned pigs on straw bedding

Free range: This is similar to free-farmed systems, however weaned pigs are reared outdoors during the grower-finisher period, rather than in barns. Due to the challenges of raising growing pigs outdoors, less than 1% of commercial pig farms use free-range practices.

Defining the outdoor components of free-farmed and free-range operations in RMA planning is challenging due to the absence of a definition for Intensive Outdoor Primary Production (IOPP) in the National Planning Standards to complement the IIPP definition. This was raised with MfE at the time the National Planning Standards were being promulgated with the advice back being that the first set of National Planning Standard Definitions was primarily aimed at resolving urban issues in planning documents and that work on rural definitions would occur at another time. This has not advanced.

NZ Pork has therefore supported the inclusion of a definition for IOPP in district planning provision elsewhere in the country and has advocated for consistency in how it is applied. In a district plan context, our approach considers the system's potential to generate effects such as on amenity from odour and dust, cognisant also of regional planning responsibility for the management of discharges to land, air and water that can often overlap.

In systems where pigs are kept outdoors (either free-farmed or free-range), careful management of stocking rates is essential to mitigate environmental impacts. NZ Pork has developed Good Management Practices for Outdoor Pigs, appended to this submission, which outlines appropriate maximum stocking rates for different outdoor systems. This document also specifies minimum groundcover requirements for various farm areas, with the expectation that recommended stocking rates should support adequate groundcover maintenance under normal conditions (excluding extreme weather events). Good Management Practices for Outdoor Pigs is now recognised NZ wide and relevant in particular by a number of regional councils for achieving nutrient management outcomes.

In outdoor systems where groundcover is maintained, effects on the environment are comparable to other pastoral farming systems. However, where groundcover is absent or significantly lower than recommended, higher stocking densities can have effects (primarily dust, nutrient and erosion and sediment related).

Regarding odour, the primary sources are pigs housed in buildings and the collection and storage of manure from these operations. Pigs raised on pasture generally do not generate odour at the same scale and no more so than other grazing animals in pastoral systems. For indoor operations, mitigations for potential odour are well established.

Table 1 provides an overview of odour sources and mitigation measures in both indoor and outdoor pig farming systems.

	Indoor System	Outdoor System
Factor	Mitigation	
Diet composition	Feed composition is closely matched to pig's nutritional requirements, especially protein to minimise the amount of odour precursors subject to anaerobic decomposition of protein in the manure.	Feed composition is closely matched to pig's nutritional requirements, especially protein to minimise the amount of odour precursors subject to anaerobic decomposition of protein in the manure. This

	This means 2 or more and appropriate diets and feed levels for the physiological (reproductive) states of animal e.g. separate gestation diet and lactating diet and for growing pigs separate weaner, grower and finisher diets.	means 2 or more and appropriate diets and feed levels for the physiological (reproductive) states of animal e.g. separate gestation diet and lactating diet and for growing pigs separate weaner, grower and finisher diets.
Treatment ponds	Maintain consistent effluent flow and sufficient active treatment volume. Maintain pH of 6.8-8.0 for effectiveness of microbial decomposition. Covering ponds can significantly reduce odour emissions.	Does not occur
Solid Separation	Maintain equipment to ensure effectiveness. Capture separated solids within a controlled drainage area with an impermeable base. Regularly transfer wet solids to the manure storage area or re-use area.	Does not occur
Slurry storage	Only stir slurry when emptying sumps or ponds	Does not occur
Slurry drains/pipes	Where possible have covered sumps or pits and use pipes rather than open drains.	Does not occur
Cleanliness of yard and raceway areas	Manure on yards and raceways following stock handling and moving, hosed away directly on completion.	Does not occur in paddocks
Housing and Management	Ventilation systems designed for correct air flow to prevent build-up of odours. All pens and stock checked for cleanliness on a daily basis. All pens cleaned between batches. Potential odorous spillages such as feed and manure cleaned up immediately. Stocking density maintained at or below those in Welfare Code	Pigs rotated around clean paddocks. Ground cover maintained. Feed wastage removed. Stocking density is very light compared to Welfare Code requirements.
Under slats	Flush out regularly	Does not occur
Pull plug pits	Flushed at a time to minimise transfer of odorous emissions	Does not occur
Spreading manure to land	Spread at a time to incorporate into crops. Spread with a favourable wind direction	Does not occur. Pigs deposit dung and urine daily
Spreading of slurry to land	Spread at a time when plants utilise nutrients. Spread with a favourable wind direction. Use low trajectory splash plate or irrigator. Spreading at	Does not occur

	a time of favourable weather forecast.	
Feed storage	Dry feeds and feed ingredients all stored in covered bins and hoppers.	Dry feeds and feed ingredients all stored in covered bins and hoppers.

Table 1: Sources of odour and mitigations on indoor and outdoor pig farms.

NZ Pork supports definitions that distinguish between intensive and extensive farming based on actual environmental effects. However, the definition and rule structure for piggeries and Intensive Indoor Primary Production in the proposed district plan does not achieve this distinction. Instead, the requirement for resource consent as a discretionary activity for piggeries is based on an arbitrary number of adult animals and is confused by the lack of clear delineation between the rule for piggeries and the rule for Intensive Indoor Primary Production.

Instead, NZ Pork recommends including a definition and rule structure for intensive outdoor farming based on the ability to maintain groundcover, as this is a more appropriate indicator of environmental impact. When groundcover is maintained in line with industry standards, effects such as odour and dust are expected to be comparable to other pastoral farming systems. In contrast, excessive stocking densities that prevent groundcover maintenance are more likely to generate adverse effects.

NZ Pork therefore recommends the following definition:

Intensive Outdoor Primary Production:

Means primary production activities involving the keeping or rearing of livestock (excluding calf-rearing for a specified time period) that principally occurs outdoors and, by the nature of the activity, precludes the maintenance of pasture or ground cover.

It excludes:

- *Pig production for domestic use involving no more than 25 weaned pigs or six sows*
- *Intensive winter grazing, where livestock are grazed on an annual forage crop at any time between 1 May and 30 September*

This definition better aligns with the actual environmental effects of outdoor pig farming from a district planning perspective and provides a clearer distinction between extensive and intensive systems.

3. Specific submission points on the Proposed Lower Hutt District Plan

The specific provision of the Proposed Plan that my submission relates to		My submission is that (include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)		I seek the following decision by council
Chapter/Appendix/ Schedule/Maps	Objective/policy/rule Standard/overlay	Oppose/support (in full or part)	Reasons	
Part 1: Introduction – Definitions	Intensive indoor primary production	Support	Support as consistent with National Planning Standards	Retain as proposed.
Part 1: Introduction – Definitions	Intensive outdoor primary production		<p>Some intensive farming operations, including pig farms, can occur outdoors. There is a gap in the definition and associated plan provisions for such operations.</p> <p>In pig farming, an intensive outdoor operation can be defined by the presence or absence of groundcover, with higher stocking densities that preclude the maintenance of groundcover more likely to produce adverse effects.</p> <p>Outdoor pig farms in which groundcover can be maintained have lower stocking densities and effects that are expected to be similar in nature to other pastoral farming systems.</p>	<p>Insert new definition to account for intensive outdoor farming operations, as follows:</p> <p><i>Intensive outdoor primary production means:</i></p> <p><i>Primary production activities involving the keeping or rearing of livestock (excluding calf-rearing for a specified time period), that principally occurs outdoors, which by the nature of the activity, precludes the maintenance of pasture or ground cover.</i></p> <p><i>It excludes pig production for domestic use which involves no more than five sows and intensive winter grazing, where livestock are grazed on an annual forage crop at any time in the period that begins on 1 May and ends with the close of 30 September of the same year.</i></p>

Part 1: Introduction – Definitions	Reverse sensitivity	Oppose	The definition is overly prescriptive and reads more as a list of when reverse sensitivity can occur, rather than defining what reverse sensitivity actually is. The list provided in the definition could be useful for non-statutory material to guide plan interpretation with issues of reverse sensitivity.	Amend definition as follows: <i>Reverse sensitivity:</i> <i>means the potential for the operation of an existing lawfully established activity to be compromised, constrained, or curtailed by the more recent establishment or alteration of another activity which may be sensitive to the actual, potential or perceived adverse environmental effects generated by an existing activity.</i>
Part 1: Introduction – Definitions	Rural activity	Oppose in part	<p>Oppose the exclusion of Intensive Indoor Primary Production from the definition.</p> <p>The subsequent reliance on this term in the GRUZ then excludes IIPP from many of the enabling provisions within the zone.</p> <p>IIPP is a farming activity that requires a rural location to operate – ie, it is a rural activity. There is nowhere else that these operations can feasibly locate.</p> <p>The national planning standards explicitly recognise IIPP as a legitimate primary production activity within the GRUZ, as follows:</p> <p><i>General rural zone:</i> <i>Areas used predominantly for primary production activities, including intensive</i></p>	Remove IPP from the exclusion within the definition.

			<p><i>indoor primary production. The zone may also be used for a range of activities that support primary production activities, including associated rural industry, and other activities that require a rural location.</i></p> <p>The definition as proposed creates confusion by stating that a rural activity means the use of land and or buildings for agricultural [...] activities, then excludes an agricultural activity that uses land and buildings.</p> <p>There is no explanation within the S32 report as to the reasoning for excluding IPP from the definition.</p>	
Part 1: Introduction – Definitions	Sensitive activity	Oppose in part	<p>The definition is comprised of a series of sub-definitions relating to particular effects or circumstances. We appreciate that this is intended to provide greater control over the ‘type’ of activity that may be sensitive to particular issues, however in doing so this also excludes any scenario not listed in the sub-definitions. For example – activities sensitive to primary production are not listed. This has potential implications for any provisions relating to reverse sensitivity and sensitive activities in the GRUZ? There is also the potential for confusion where definitions that have different listed activities overlap, for example: activities sensitive to noise from industry.</p>	<p>Amend definition as follows: <i>Sensitive activity means:</i></p> <ol style="list-style-type: none"> 1. <i>residential activity, or</i> 2. <i>retirement village, or</i> 3. <i>supported residential care facility, or</i> 4. <i>marae, or</i> 5. <i>healthcare activity, or</i> 6. <i>educational facility, or</i> 7. <i>community facility, or</i> 8. <i>visitor accommodation activity, or</i> 9. <i>place of assembly, or</i> 10. <i>place of worship</i>

			Suggest that the list of sensitive activities should be contained to a single list of those that primarily relate to potential reverse sensitivity effects. Activities sensitive to other issues, such as hazardous substances or natural hazards should be independently defined as such.	
Part 2 – District Wide Matters: Strategic Directions			<p>UDSD-O8 is the only rural related strategic direction objective that talks to the rural area as a greenbelt within which primary production is enabled.</p> <p>The plan would benefit from strategic directions for the rural environment that clearly identify:</p> <ul style="list-style-type: none"> - The key priorities for the rural areas of the district - How primary production will be supported in the district – including protection from reverse sensitivity effects. - how the interface between the rural environment and other environments within the district will be managed. - The approach to highly productive land. <p>This would better support the objective, policy and an appropriate method framework to enable primary production.</p> <p>Rural environments adjacent to urban centres are critically important for food production. Diversity in the primary production system needs to be enabled and the ability to adapt to climate change encouraged. This may include</p>	Add strategic directions for the rural environment.

			intensifying the way rural resources are used to support human wellbeings and environmental oputcomes.	
Part 3 – Area Specific Matters: General rural zone	Introduction	Support in part/Oppose in part	<p>Support provided Intensive Primary Production is removed from the exclusion of the definition of Rural Activities.</p> <p>If definition is not amended, then do not support use of this definition as used throughtout the introduction. The continued reference to rural activities, which is a subset of primary production, narrows the legimiate and expected use of the zone compared to that intended by the GRUZ zone standards in the National Planning Standards.</p> <p>There is no explanation in the S32 report as to why this narrowing is appropriate across the GRUZ or how this is the most efficient and effective way to implement the requirements of the RMA.</p>	<p>Amend definition as requested above OR Change use of definition to Primary Production throughout.</p>
	Objs and Pols - general	N/A	<p>There is a lack of any meausres throughout the objective and policy structure to address reverse sensitivity issues that can arise when sensitive activities impact on the ongoing viability of primary production activities in rural areas.</p> <p>Reverse sensitivity is a significant issue in many rural areas, particularly where land has been fragmented by lifestyle developments.</p>	<p>Insert reference to reverse sensitivity risks and the need to manage these to protect primary production activities within the GRUZ in the objective and policy framework.</p>

			While some objectives and policies make the suggestion of managing incompatible activities, it should be more explicit that sensitive activities present a risk to primary production activities in the rural zone and that this risk needs to be managed through the provisions of the GRUZ chapter.	
	GRUZ-O1 – GRUZ-O2 GRUZ-O3	Support in part/Oppose in part	Support provided Intensive Primary Production is removed from the exclusion of the definition of Rural Activities	Amend definition as requested above OR Change use of definition to Primary Production throughout
	GRUZ-O4	Support in part	Support management of adverse effects within the zone. Objective should include the reverse sensitivity effects of sensitive activities on primary production.	Include reverse sensitivity effects in the objective.
	GRUZ-HPLO-O1	Support in part.	Support objective protecting HPL from subdivision land use and development. Objective should include protecting HPL from reverse sensitivity effects as per clause 3.8(2)(b)	Include reference to protecting HPL from reverse sensitivity effects in the objectives.
	GRUZ-P1	Support in part/Oppose in part	Support provided Intensive Primary Production is removed from the exclusion of the definition of Rural Activities	Amend definition as requested above OR Change use of definition to Primary Production throughout
	GRUZ-P2	Support in part/Oppose in part	Support in part provided Intensive Primary Production is removed from the exclusion of the definition of Rural Activities	Amend definition as requested above OR Change use of definition to Primary Production throughout

			<p>Oppose in part - listing potentially compatible activities in the policy prescribes an expectation of what is considered to be a compatible activity. The compatibility of an activity within the GRUZ should be based on an assessment of the individual activity. The activities are clearly sensitive to the effects of primary production as is evident through the manner in which other district plans have applied controls and an appropriate activity status regime.</p> <p>GRUZ-P2 does not achieve:</p> <ul style="list-style-type: none"> • GRUZ-HPLO-O1 • GRUZ-O2 • GRUZ-O1 • UDSD-O8 (as notified and suggested to be amended) <p>Note that Intensive Indoor Primary Production is excluded from the definition of rural activity and is not included in the list of potentially compatible activities. This makes it unclear whether the policy structure supports any IIPP in the zone.</p>	Delete clause 2.
	GRUZ-P3	Oppose	The policy provides no consideration of the potential for incompatibility with primary production.	Amend: <u>d. Do not conflict with or result in reverse sensitivity effects on existing or future primary production activities.</u>
	GRUZ-P4	Support	Support policy on built development	Retain as proposed
	GRUZ-HPLO-P1	Support	Support as giving effect to the NPS-HPL	Retain as proposed.
	GRUZ-HPLO-P2	Support in part	Support intent of HPL protection, however, the current wording does not recognise the overall intent of the NPS-HPL provided by Clause 3.9	Reword as follows:

			to protect only from <i>inappropriate</i> use and development. Not all of the scenarios listed in the proposed policy would be considered inappropriate.	<p>Avoid activities in the Highly Productive Land Overlay that:</p> <ol style="list-style-type: none"> 1. Reduce the area of highly productive land, or 2. Result in fragmentation of highly productive land, or 3. Restrict land-based primary production activities on highly productive land. <p><u>Avoid the inappropriate use or development of highly productive land that is not land-based primary production.</u></p>
	Rules – GRUZ- R1	Support	Support PA status for repair and maintenance of buildings and structures	Retain as proposed
	GRUZ – R2	Support	Support PA status for demolition or removal of buildings and structures.	Retain as proposed
	GRUZ-R3	Support	Support PA status for construction of new builds and structures. Setback standard should include setbacks to Intensive Indoor Primary Production.	<p>Add</p> <p>Setback GRUZ-SXX: Setback from intensive indoor and intensive outdoor primary production.</p>
	GRUZ-R4	Oppose	<p>The rule limits a maximum of five adult pigs at the piggery to meet the PA requirements. This is a very small number, and so we assume the rule is intended to capture ‘backyard operators’ rather than any commercial or paracommercial operation.</p> <p>However, the current wording of the rule – relating only to the number of adult pigs on site</p>	Delete rule.

			<p>- could also theoretically include any size of grower pig facilities, where piglets weaned at roughly 4 weeks old are grown until they are ready for processing at approximately 20-25 weeks. In such a situation there may be no adult pigs on site.</p> <p>We are unsure how the 5 adult pig limit was arrived at, or how the council have arrived at the conclusion that a number of adult pigs above this limit would exceed a PA threshold for anticipated effects.</p> <p>We also assume this is intended to cover only outdoor pigs, given the reference to grazing and shelter areas.</p> <p>There is a subsequent lack of clarity in the rule structure about whether less than adult 5 pigs kept indoors, or if many growing pigs kept indoors or outdoors, should be assessed against this rule or rule GRUZ-R14.</p> <p>We are unclear as to the need for a mandated buffer zone between the piggery and a residential unit on the same site. This seems to be an unnecessary control on landowners.</p> <p>We would prefer to see a rule structure that clearly defines intensive indoor and intensive outdoor primary production with appropriate rule structures to manage the potential effects.</p>	
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			Outdoor pig farms that do not meet the definition of an intensive outdoor farm (due to maintaining groundcover) should be permitted under Rule GRUZ-R5, as the anticipated effects would be similar to any other pastoral farming activity.	
	GRUZ-R5	Support	Support PA status for other rural activities not provided for.	Retain as proposed
	GRUZ-R6	Support in part	Support PA status for residential activities, however all residential activities in the GRUZ should be subject to setbacks from intensive primary production activities to prevent reverse sensitivity issues.	Add Setback GRUZ-SXX: Setback from intensive indoor and intensive outdoor primary production.
	GRUZ-R7	Support in part	Support RD activity status for Papakainga. Support matters of discretion including reverse sensitivity effects on rural activities, provided that Intensive Indoor Primary Production is not excluded from the definition.	Retain as proposed, subject to amendments to definition of Rural Activities.
	GRUZ-R11	Oppose in part	Oppose PA status for recreation activities not otherwise provided for. Recreational activities can constitute a sensitive activity that could restrict primary production activities from operating with the GRUZ. Potential effects of recreational activities should be assessed via a consenting pathway to allow for a full assessment of effects and the application of appropriate mitigations.	Amend activity status to RDIS. Matters for discretion should include reverse sensitivity effects on primary production activities.
	GRUZ-R12	Oppose in part	Oppose PA status for visitor accommodation. Visitor accommodation can constitute a sensitive activity that could restrict primary production activities from operating with the GRUZ. Potential effects of visitor accommodation should be assessed via a	Amend activity status to RDIS. Matters for discretion should include reverse sensitivity effects on primary production activities.

			consenting pathway to allow for a full assessment of effects and the application of appropriate mitigations.	
	GRUZ-R14	Oppose	<p>Oppose DIS activity status for Intensive Indoor Primary Production.</p> <p>The potential effects of IIPP are well known, as are appropriate mitigations. The GRUZ is the only zone that IIPP can locate and is an intended land use in the zone, as per the zone description in the National Planning Standards.</p> <p>The effects of IIPP can be appropriately assessed and managed via a restricted discretionary consenting pathway, that recognises that IIPP is a legitimate and anticipated activity in the GRUZ while still allowing for an assessment of potential effects and retaining the ability to decline the consent if necessary.</p> <p>Required setback distances within the rule framework are a good starting point for an RD activity status and provide reciprocity with setbacks from sensitive activities to IPP activities.</p> <p>Intensive Outdoor Primary Production activity should be added to this rule to capture outdoor pig farming that is considered intensive, and so may produce greater effects than extensive pig farming.</p>	<p>Amend rule as follows:</p> <p>Intensive indoor <u>and intensive outdoor</u> primary production.</p> <p>Activity status: Discretionary</p> <p><u>Restricted discretionary, where:</u></p> <p><u>All paddocks, structures, buildings and areas of paved or otherwise impervious material used to house stock, and any wastewater treatment systems associated with intensive primary production, shall be located a minimum distance of 300m from the notional boundary of any lawfully established existing sensitive activity on another site, and 1km from any residential zone.</u></p> <p><u>Matters of discretion are restricted to:</u></p> <ul style="list-style-type: none"> • <u>The extent to which the adverse effects of the activity can be avoided, remedied and mitigated.</u> • <u>Maintenance of rural character and amenity through the</u>

				<p><u>activity's nature, scale, and built form.</u></p> <ul style="list-style-type: none"> • <u>Design, location, and separation of animal housing (including buildings or compounds) to avoid adverse effects on sensitive uses, residential units, and residential zone boundaries.</u> • <u>Measures to internalise adverse effects and avoid conflicts or reverse sensitivity with other zone-anticipated activities.</u> • <u>Any benefits derived from the activity being undertaken on the site.</u>
	GRUZ-R18	Support	Support DIS activity status for Retirement villages	Retain as proposed
	GRUZ-R19	Support	Support DIS activity status for Community facilities	Retain as proposed
	GRUZ-R20	Support	Support DIS activity status for Educational facilities	Retain as proposed
	GRUZ-R21	Support	Support DIS activity status for Health care activities	Retain as proposed
	GRUZ-HPLO-R1	Support in part	<p>The rule references only land-based primary production, however the NPS-HPL recognises other activities that are not considered inappropriate on HPL (Clause 3.9). The rule should also recognise these activities as a PA.</p> <p>Any buildings or structures should be subject</p>	Amend rule to provide for non-land based primary production activities that are appropriate on HPL, as per the NPS-HPL. Add standard GRUZ-SXX: Setbacks to Intensive indoor and Intensive Outdoor primary production.

			to a setback from Intensive Indoor and Intensive Outdoor Primary Production.	
	GRUZ-HPLO-R2	Support in part	The rule provides for land based primary production as a permitted activity and all other activities as non-complying in the HPL overlay. However, the NPS-HPL provides for other activities that are not inappropriate on HPL (Clause 3.9). The rule should recognise these activities as permitted.	Amend rule to provide for non-land based primary production activities that are appropriate on HPL, as per the NPS-HPL
	GRUZ-SXX		Add setback standard to Intensive Indoor and Intensive Outdoor primary production to protect these activities from reverse sensitivity effects arising from new sensitive activities.	<p>Add standard as follows:</p> <p><u>1. Any newly established sensitive activity shall be set back 300m from the closest outer edge of any paddocks, structures, or buildings, and areas of paved or otherwise impervious material used to hold or house stock, and wastewater treatment systems used for intensive primary production.</u></p> <p><u>The establishment of residential units, seasonal worker accommodation, or minor residential units on the same site as the intensive primary production are exempt from this rule requirement.</u></p>