

BEFORE TAUPŌ DISTRICT PLAN HEARINGS PANEL

Under

The Resource Management Act
1991 ('the Act')

In the matter of

Plan Change 42 to the Taupō
District Plan: General Rural and
Rural Lifestyle Environments

Statement of Planning Evidence of Sarah Hunt

On behalf of Wairarapa Moana ki Pouakani Incorporation Limited (Submitter no. 47)

9 August 2023

INTRODUCTION

1. My name is Sarah Hunt. I am a Senior Planner employed by Cheal Consultants Ltd based in Taupō for the last seven years. I have worked as a planner for twelve years in both New Zealand and Scotland in both public and private sectors. I am a Full Member of the New Zealand Planning Institute. I have a Bachelor of Environmental Management (majoring in Policy and Planning) and a Master of Applied Science from Lincoln University. I was certified as a commissioner under the Ministry for the Environment's Making Good Decisions programme in 2022. In my role at Cheal Consultants, I have prepared numerous resource consent applications to District and Regional Councils, submitted on plan changes and attended hearings as an expert planning witness.
2. I am representing submitter Wairarapa Moana ki Pouakani Incorporation Ltd ("**Wairarapa Moana**"), owner of large land holdings of some 10,705 hectares both in, and surrounding Mangakino. Wairarapa Moana operates large dairy and forestry enterprises on the land.
3. My colleague Catriona Eagles prepared the original submission on behalf of Wairarapa Moana.

CODE OF CONDUCT

4. I confirm I have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. I confirm this evidence is within my area of expertise except where I state that I am relying on facts or information provided by another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express. Unless otherwise specified, all statements in this evidence are my own opinion.

SCOPE OF EVIDENCE

5. I have reviewed the Plan Change documents including the Section 32, all the submissions, and further submissions, and the Section 42A report and attachments.

6. I have prepared this statement based on my knowledge of the Resource Management Act 1991, the Taupō District Plan, and my knowledge of the locality.
7. My evidence covers the following topics:
 - (a) Buildings for the management of farmed animals definition
 - (b) Buildings for the management of farmed animals setback
 - (c) Conclusion

BUILDINGS FOR THE MANAGEMENT OF FARMED ANIMALS - DEFINITION

8. I support the consideration of amenity issues that can arise from buildings used for the management of farmed animals relating to visual amenity and odour. This matter can particularly be an issue when located near to residential dwellings, namely near Rural Lifestyle or Residential, less of an issue in the General Rural Environment where stock and stock activities are known to occur and thus expected.
9. I support the inclusion of the note *Building with floor area of 50m² or less are exempt from this definition* as this exempt provides clarity for the minor rural buildings required for kennels, stables, poultry. However its placement at the bottom of Rule 4b.2.6 is likely to be confusing as it appears that the exemption relates to all clauses (i) to (v)ii above, not just to clause (iv). In my opinion the note needs to be located immediately under clause (iv) or it is better located in the definition itself ie

Buildings for the management of farmed animals – includes, but is not limited to, buildings used for accommodating livestock or farmed animals, either overnight or for a period during the day, and includes cow milking sheds, calf sheds, buildings used to house intensive farming activities, poultry farming buildings, feed pads, pet boarding facilities and stables. Buildings housing animals do not include a residential unit accommodating household pets such as cats and dogs. Buildings with floor area of 50m² or less are exempt from this definition.

BUILDINGS FOR THE MANAGEMENT OF FARMED ANIMALS – RULE 4B.2.6(IV)

10. Rule 4b.2.6(iv) incurs a significant inefficiency and cost to existing farming operations. Recent development of housing stock provides significant benefits to animal health, feed and water management and the capture of stock effluent. These buildings are

best placed in close proximity to existing farm buildings such as milking sheds and yards for reasons such as existing internal road accesses, existing water supply, existing effluent ponds, efficiencies for staff movement and movement of stock. Use of existing infrastructure benefits the environment reducing the need for more infrastructure (such as additional effluent ponds), construction and compliance costs.

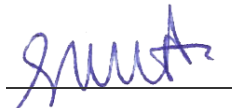
11. Rule 4b.2.6(iv) requires such buildings to be placed 200m from all boundaries which requires properties to be at least 450m wide in any direction. No evidence can be found in S32 report for the use of 200m measurement in this rule. Many existing farm buildings and yards are not located 200m from boundaries.
12. This rule will require such buildings to be located in isolation from existing buildings and infrastructure. In my opinion this is not consistent with the objective of the General Rural Environment. Yet where such buildings are placed in close proximity to existing buildings, the visual amenity is maintained through the clustering of such buildings in one location, as well as existing infrastructure being used, and existing farm pasture not taken out of production. An existing cluster of farm buildings with existing farm operations is known to its neighbours. The placement of new buildings adjoining these is efficient and centres activities in one location meeting the objectives of protecting the availability of rural land, not compromising the efficient function of infrastructure and maintaining large open space between built structures. This approach is consistent with NPS-HPL and the General Rural zone objective.
13. In my opinion, the matter of amenity issues arising from building for management of farmed animals are primarily visual amenity, odour and noise. The use of existing infrastructure and existing areas of occupation is an efficient use of existing resource. The addition of an exemption to Rule 4b.2.6(iv) for buildings located within 50m of existing farm buildings in existence at the date of the plan change would be an effective manner of addressing this matter.

CONCLUDING COMMENTS

14. In my opinion, clarity can be provided in relation to exemption for 50m² buildings in the definition for buildings for the management of farmed animals. The consolidation of building for farmed animals with existing farm buildings meets the

objectives sought by the General Rural zone, enables use of existing infrastructure to the benefit of the environment and make for a more efficient planning framework.

DATED 9 AUGUST 2023



Sarah Hunt

Attachment A - RMA s32AA evaluation template

S32 (1) – Evaluation of objectives

Providing for clustering of buildings for management of farmed animals next to existing farm buildings achieves objectives 3b.2.1, 3b.2.2 and 3b.2.5.

- 3b.2.1 - Primary production is enabled by protecting the availability of rural land and their productive capability. Clustering buildings reduces the loss of productive land as existing roading and infrastructure could be used.
- 3b.2.2 – The character of the General Rural Environment is maintained by clustering buildings resulting in less built form scattered across the rural environment, maintaining large open spaces.
- 3b.2.5 – Reverse sensitivity effects would be avoided, as the buildings for management of farmed animals would be next to existing farm buildings eg dairy sheds that are already lawfully established, and generally already have large setbacks (although less than 200m, particularly from road boundaries).

S32(2) – Benefits and Costs

Benefits and Costs of Effects (s32(2)(a) of providing exemption for 200m setback	
Benefits	Costs
Environmental	
<ul style="list-style-type: none"> • Protects the availability of rural land and their productive capability. • Protects the rural character by clustering buildings, rather than having them dispersed. • Doesn't discourage new farming practices which can improve on farm environmental performance 	<ul style="list-style-type: none"> • None identified
Economic	
<ul style="list-style-type: none"> • Reduces cost as existing infrastructure can be used (power, water, access, effluent ponds, reduced loss of productive land) • Removes consenting costs for 	<ul style="list-style-type: none"> • None identified
Social	
<ul style="list-style-type: none"> • None identified 	<ul style="list-style-type: none"> • None identified
Cultural	
<ul style="list-style-type: none"> • None identified 	<ul style="list-style-type: none"> • None identified

32 (2)(c) Risk of acting or not acting if there is uncertain or insufficient information

The risk is low for both acting or not acting. If the provision was amended to enable buildings for farm animal management to be located within 50m of existing farm buildings (albeit within 200m of a boundary) there are existing provisions that provide building setbacks from boundaries.

Attachment B : Amendments Version

4b.2.6 Minimum building setbacks

- i. 30 metre setback for dwellings and minor residential units and other buildings¹⁰⁴ from the front boundary.
- ii. 15 metres setback for dwellings, and minor residential units and other buildings¹⁰⁵ from all other boundaries.
- iii. 25 metres in Outstanding Landscape Areas from all boundaries.
- iv. 200 metres for buildings for the management of farmed animals from all boundaries:
 - Exception: Buildings for the management of farmed animals located less than 50m from existing farm buildings (existing as of (date))
 - NOTE: Buildings with a floor area of 50m² or less are exempt from this definition¹⁰⁷
- v. There shall be no front boundary setback for buildings and activities associated with Electricity Generation and Renewable Energy Generation Activities on land identified as Geothermal Area in Section O within an Electricity Generation Core Site where the road extends over any power generation Building or Structure.
- vi. There shall be no boundary setback for buildings and activities associated with Electricity Generation on land identified as Geothermal Area in Section O within an Electricity Generation Core Site.
- vii. All new buildings must be setback at least 30m from the legal boundary of an existing plantation forest.¹⁰⁶

EXCEPTION: For the purpose of this performance standard water tanks are not required to comply with the setback requirements in this standard.

NOTE: Buildings with a floor area of 50m² or less are exempt from this definition¹⁰⁷