



**ADDERLEY  
HEAD**

ENVIRONMENTAL LAW SPECIALISTS

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## SUBMISSION ON THE PROPOSED WAIMAKARIRI DISTRICT PLAN

Clause 6, First Schedule of the Resource Management Act 1991

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**To:** The Waimakariri District Council  
Private Bag 1005  
Rangiora 7440

**Submitter:** **BRENDAN AND ANGELIQUE GLUBB**  
  
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**Proposal:** The Proposed Waimakariri District Plan

## SUBMISSION ON THE PROPOSED WAIMAKARIRI DISTRICT PLAN

### Name of submitter

- 1 The names of the joint submitters are Brendan and Angelique Glubb (the **Glubbs** or the **submitter**).

### Proposal to which submission relates

- 2 This submission relates to the following parts of the Proposed Waimakariri District Plan (pWDP):
- (a) the separation distances to and from intensive primary production; and
  - (b) the rules regulating the activity of intensive primary production.
- 3 The submitter could not gain an advantage in trade competition through this submission.

### Detail of submission

- 4 The submitter's underlying concerns are the environment effects of intensive primary production, such as poultry farms, on existing residential activities in the rural zones.

#### Separation distances to and from intensive primary production

- 5 The submitter supports the inclusion of a 300 m setback between residential units and intensive primary production.
- 6 However, Rule GRUZ-BFS5, as currently worded, seems to apply the setback of 300 m to establishment of new residential dwellings, but not to establishment of new intensive primary production (e.g. poultry farms).
- 7 Therefore submitter requests that Rule GRUZ-BFS5 be amended, so that it is clear that the setback of 300 m also applies to establishment of new intensive primary production.

#### Rules regulating the activity of intensive primary production

- 8 Rules GRUZ-R17 and GRUZ-R18 regulate intensive indoor primary production and intensive outdoor primary production, respectively. The Rules are worded in the exact same way, except that one regulates indoor activities (GRUZ-R17) and one regulates outdoor activities (GRUZ-R18).
- 9 The Rules require that indoor and outdoor intensive primary production activities obtain a restricted discretionary consent. There is no permitted activity pathway. Nor is there a stricter activity status that intensive primary production activities would default to if the activity did not meet the restricted discretionary requirements.

- 10 The submitter is generally supportive of Rules GRUZ-R17 and GRUZ-R18, which require all intensive primary production activities to obtain a resource consent.
- 11 However, the submitter seeks that Rules GRUZ-R17 and GRUZ-R18 be amended in the following way, to afford appropriate protection to neighbouring activities:
- (a) add an additional matter of discretion to Rules GRUZ-R17 and GRUZ-R18 so that decision makers can consider adverse odour effects and whether such adverse effects will be contained / internalised within the boundary of the subject site; and
  - (b) introduce a non-complying activity status and complementary rule for intensive primary production activities, if the activity:
    - (i) either breaches 300 m setback between residential units (or other sensitive receivers) and the intensive primary production activity; or
    - (ii) cannot internalise adverse effects.

#### **Decision sought**

- 12 The submitter seeks the following relief:
- (a) the proposed change to Rule GRUZ-BFS5, as outlined above in para 7;
  - (b) the proposed changes to Rules GRUZ-R17 and GRUZ-R18, and the addition of a new non-complying rule, as outlined above in para 11;
  - (c) amendment to relevant objectives and policies dealing with rural character and rural amenity, and reverse sensitivity effects as may be required to support amendment to the above rules; and
  - (d) such other alternative amendments, additional amendments, or consequential amendments, deletions, or additions that are necessary or appropriate to give effect to the intent of this submission, and the submitter's underlying concerns.

#### **Conclusion**

- 13 The submitter does wish to be heard in support of this submission.
- 14 Thank you for the opportunity to submit on the Proposed Waimakariri District Plan.

Dated 19 November 2021



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Chris Fowler

Counsel for Brendan and Angelique Glubb

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