

**BEFORE THE HEARINGS PANEL AT TAUPŌ**

**IN THE MATTER** of the Resource Management Act  
1991 ("**the Act**")

**AND**

**IN THE MATTER** of the hearing of submissions on  
Proposed Plan Change 38 to the Taupō  
District Plan

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**STATEMENT OF EVIDENCE OF LYNDA MARION WEASTELL MURCHISON**

**FOR THE NEW ZEALAND PORK INDUSTRY BOARD**

**10 AUGUST 2023**

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## **SUMMARY STATEMENT**

1. This planning evidence addresses matters raised in the New Zealand Pork Industry Board ("**NZPork**") submission on Proposed Plan Change 38 to the Taupō District Plan ("**the plan change**"). The plan change deals with strategic objectives and policies.
2. The scope of my evidence focuses on submissions made by NZPork on Strategic Direction 2 - Freshwater Quality/Te Mana o Te Wai; Strategic Direction 4 - Climate Change; and a request for a new strategic objective and policy for rural environments.
3. In my opinion, the plan change would be enhanced if the provisions for Freshwater Quality/Te Mana o Te Wai were clearer, in particular around matters to be addressed in the Taupō District Plan versus a regional freshwater plan as directed under the National Policy Statement for Freshwater Management 2020 as amended in 2022 (NPS-FM). I do not agree with the assessment in the s42A Report that the matter is already addressed through use of the term 'land use' in the plan change.
4. In my opinion, the plan change would benefit from greater clarity in the strategic objective and policy for climate change. However, I do not believe the relief sought in the NZPork submission provides sufficient scope to amend the provisions.
5. Finally, I suggest the plan change ought to provide a strategic objective and policy for rural areas. The amendments proposed in the S42A Report partially address the issue as it relates to the rural-urban interface. However, in my view, the plan change should provide strategic direction for the management of rural areas, activities and communities as well.

## **QUALIFICATIONS AND EXPERIENCE**

6. My name is Lynda Marion Weastell Murchison (Dr).
7. I currently work part-time as a Senior Advisor for NZPork and the remainder of my time as an adjunct lecturer at Lincoln University and a planning consultant for Hokonui Rūnanga and the Te Wai Parera Trust. Both these organisations are based in Murihiku/Southland and have no land or activities

in the Taupō District, or interest in the Taupō District Plan or this plan change.

8. I hold the following relevant qualifications:
  - A PhD in Environmental Policy and Planning and a MA degree (First Class honours) in Geophagy from Canterbury University
  - Post-graduate qualifications in Advanced Regional, Urban and Resource Planning and Natural Resource Law from Lincoln and Canterbury universities respectively
  - New Zealand Certificate in Agriculture from the Open Polytechnic
  - Full membership of the New Zealand Planning Institute.
9. I have worked as a planner or planning manager for over 25 years, including as the District Planner for Selwyn District Council, Principal Planning and Consents Advisor for Environment Canterbury (Canterbury Regional Council), Environmental Planning lead for Te Rūnanga o Ngāi Tahu (the iwi authority over most of Te Wai Pounamu/South Island) and in private practice. I also lecture in environmental planning and agriculture.
10. I have worked extensively in both plan drafting and resource consent processing across a wide range of environmental topics including urban planning, rural land uses, freshwater, indigenous biodiversity, coastal environments, natural hazards and climate change. I drafted the operative Selwyn District Plan, the Freshwater Chapter of the Canterbury Regional Policy Statement, the first draft of the Canterbury Land and Water Regional Plan, several catchment plans and many plan changes to both regional and district plans.
11. I am familiar with the Act, the NPS-FM, the plan change, the Section 32 Report, the S42A Report and the submission of NZPork.
12. While these are not proceedings in the Environment Court, I have prepared my evidence in accordance with the Environment Court's Code of Conduct for Expert Witnesses, and I agree to comply with it. My qualifications as an expert witness are set out above. I confirm that the issues addressed

in this brief of evidence are within my area of expertise, except where I state I am relying on other information.

13. While I am employed by NZPork, the opinions expressed in this evidence are my own professional opinions. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.
14. I did not prepare the submission lodged by NZPork.

### **SCOPE OF EVIDENCE**

15. My evidence addresses the following matters:
  - (i) Introductory material on NZPork and the pork sector
  - (ii) Strategic Direction 2 – Freshwater Quality/Te Mana o Te Wai Objective 2.2.2 and Policy 2.2.3
  - (iii) Strategic Direction 4 – Climate Change Objective 2.4.2 and Policy 2.4.3
  - (iv) A new Strategic Direction – Rural Environments.
16. The plan change and the broader planning framework within which it sits are described in both the relevant S32 Report and the s42A Report provided by Taupō District Council. Therefore, I have not repeated that analysis in my evidence, except for particular matters which are relevant to the NZPork submissions.
17. My evidence includes recommended amendments to the plan change provisions, where appropriate.

### **THE NEW ZEALAND PORK SECTOR**

#### NZ Pork Industry Board

18. The New Zealand Pork Industry Board is a statutory board established under the Pork Industry Board Act 1997. The Board is funded by compulsory levies paid by pig farmers.
19. The object of the Board is to help attain the best possible net ongoing returns for New Zealand pigs, pork products and co-products, and to support the pork industry to make the best possible on-going contribution to the New Zealand economy.

20. An essential part of attaining these objectives is ensuring pig farming meets or exceeds expectations around environmental and social responsibility, which includes contributing to the collective goal to reduce greenhouse gas (GHG) emissions, while ensuring people have access to high quality and affordable animal protein.

#### Commercial Pig Farming in New Zealand

21. The commercial pig farming industry in New Zealand is small by international standards, with 93 registered commercial pork producers nationally in 2021. These farmers produce approximately 632153 pigs annually, with a rolling four-year average value of \$178m (2018-2021) ([www.pork.co.nz](http://www.pork.co.nz)). Ninety-five percent of pig farmers have NZPork Pigcare Accreditation.
22. In New Zealand, pigs are farmed using a spectrum of models from intensive indoor farming systems to outdoor free-farmed and free-range systems. Outdoor production relies on flat land, low rainfall and free draining soils, so most outdoor farms are situated in Canterbury. Some pig farmers specialise in pork production only, while others farm pigs in conjunction with other activities, including sheep and beef, arable and dairy farming.
23. Pigs are monogastric animals, so do not produce biogenic methane emissions on the same scale as ruminant livestock. However, they require concentrated, highly specialised diets for optimal nutrition. Therefore, pig farmers rely on a combination of grains, grazing (in outdoor situations) and supplementary feeds, including [human] food waste.
24. Annual pork consumption per capita in New Zealand is around 23kg and is projected to increase by 0.8kg per capita year on year to 2031. Currently, only 40% of pork products consumed in New Zealand are sourced domestically; the balance is imported pork product mostly as cured meats (bacon and ham) ([www.pork.co.nz](http://www.pork.co.nz)).
25. However, New Zealand pork producers form an integral part of the rural economy: they utilise other farming resources such as grains for feed; provide a source of organic fertiliser which is high in nitrogen; and provide employment. As the focus on reducing biogenic methane emissions increases, pig farming may play an increasing role in allowing livestock farmers to diversify and reduce methane emissions,

providing a source of organic nitrogen fertiliser, and potentially as a sink for food waste.

26. Traditionally, dairy farmers often kept pigs as part of a complimentary farming system, feeding them on milk by-products. While that practice no longer occurs, the principle of synthesized or mixed farming to efficiently utilise feed and minimise waste (including GHG emissions) remains valid.
27. The potential of pig farming in the reduction of food waste has been recognised by the Office of the Prime Minister's Chief Science Advisor in the project, 'Food resource, food waste' ([www.pmsca.ac.nz](http://www.pmsca.ac.nz)). This project started in April 2022 and to date two reports have been produced. Reports 3 and 4 are due this year. Report 3 is exploring options for capturing value from food waste which isn't prevented or rescued, such as upcycling, conversion to animal feed, composting, and anaerobic digestion.
28. From the NZPork register of piggeries, I understand there are currently very few piggeries operating in Taupō District. However, the potential role of pig farming in a low emission farming economy means NZPork is keen to ensure all regional and district plans recognise and enable both indoor and outdoor pig farming, and the spreading of pig effluent, within rural environments.

## **STRATEGIC DIRECTION 2 – FRESHWATER QUALITY/TE MANA O TE WAI**

### Objective 2.2.2

29. Strategic Direction 2 addresses freshwater and in particular the obligations of district councils under the NPS-FM.
30. The concept of te mana o te wai is identified in section 1.3 of the NPS-FM as a fundamental concept in freshwater management. The concept is described in section 1.3 and includes six principles listed in clause 1.3(4).
31. Clause 1.3(2) states that "Te Mana o Te Wai is relevant to all freshwater management and not just to the specific aspects of freshwater management referred to in this National Policy Statement/
32. Policy 1 reads, "Freshwater is managed in a way that gives effect to Te Mana o Te Wai."

33. Strategic Direction 2 of the plan change applies Te Mana o Te Wai to Taupō District using Objective 2.2.2 and Policy 2.2.3. Objective 2.2.2 reads:
- “Subdivision and land use is managed in a way that promotes the positive effects, while avoiding, remedying or mitigating adverse effects (including cumulative effects) of that development on the mauri, health and well-being of water bodies, freshwater ecosystems and receiving environments within Taupō District.”
34. NZPork has submitted opposing Objective 2.2.2 in part on the basis that it goes beyond the direction to territorial authorities in the NPS-FM and potentially overlaps with the functions of regional councils in relation to effects of rural land uses on freshwater.
35. The relief requested is “Amend Objective 2.2.1(1) to an objective that corresponds to the function, powers and duties of the territorial authority.”
36. The S42A Report addresses this matter in section 4.4, paragraph 87. The report notes that district councils have a function to manage effects of land uses under s31 of the Act and quotes the direction to territorial authorities in clause 3.5(4) of the NPS-FM. That clause states:
- “Every territorial authority must include objectives, policies and methods in its district plan to promote positive effects and avoid, remedy or mitigate adverse effects (including cumulative effects) of **urban development** on the health and well-being of water bodies, freshwater ecosystems and receiving environments” [emphasis added].
37. The S42A Report states that the term ‘land use’ in Objective 2.2.2(1) means the objective only applies to district council functions, and does not recommend any change.
38. In short, both the submitter and the s42A Reporting officer are relying on the same provisions in the NPS-FM to argue contrary positions. I do not agree wholly with either position, for the following reasons.
39. Firstly, I do not agree that the terms ‘urban development’ and ‘land use’ are synonymous. Rather, urban development is a form of land use. Use (of land) is defined in s2 of the Act as



“(i) alter, demolish, erect, extend, place, reconstruct, remove, or use a structure or part of a structure in, on, under, or over land; and

(ii) drill, excavate, or disturb land in a similar way; and

(iii) damage, destroy, or disturb the habitats of plants or animals in, on or under land; and

(iv) deposit a substance in, on, or under land; and

(v) any other use of land....”

40. Therefore, in my view, plan provisions that refer to land use to apply to more activities than urban development.

41. Secondly, the purpose of a district plan is set out in s72 of the Act as, “to assist a territorial authority to carry out its functions to achieve the purpose of the Act.”

42. Therefore, the provisions in a district plan cannot apply to matters which are not the function of the territorial authority under the Act. To my mind this means one can read the provisions of a district plan knowing they cannot apply to matters that are not the function of a territorial authority under the Act.

43. However, regional councils and district councils have overlapping functions under the Act. This occurs because regional councils have a specific function to control land uses which affect water quality or quantity (among other things) under s30(1)(c) of the Act. Under s75(4)(b), a district plan cannot be inconsistent with a regional plan for any matter specified in s30(1).

44. Thirdly, under s75(3)(a) of the Act, a district plan must give effect to any relevant national policy statement. In this case the NPS-FM is relevant.

45. As noted in paragraph 35 above, Clause 3.5(4) of NPS-FM directs territorial authorities to include objectives, policies and methods in the district plan in relation to managing the effects of **urban development** on water bodies, freshwater ecosystems and receiving environments [emphasis added].

46. Clause 3.2(3) of the NPS-FM states that “Every regional council must include an objective in its regional policy statement that describes how the management of freshwater in the region will give effect to Te Mana o Te Wai.”

47. Section 3.3 requires regional councils to adopt long term visions for the management of freshwater in the region and include objectives to give effect to that vision in the regional policy statement. Regional councils are also directed to implement the national objectives framework for freshwater under section 3.7 of the NPS-FM.
48. I understand that Waikato Regional Council [like most regional councils] has begun the process of preparing the changes to the Waikato Regional Policy Statement (RPS) required under the NPS-FM by December 2024.
49. Within this context, I believe, there is merit in ensuring Objective 2.2.2(1) aligns with the wording in s3.5(4) of the NPS-FM at least until an amended Waikato RPS includes any additional requirements for district plans.
50. Finally, under s32 of the Act a council must be satisfied that every objective in the plan is necessary to achieve the purpose the Act and that the provisions are the most appropriate having evaluated them against the main alternatives.
51. In my view, duplication between regional and district plans in relation to managing the effect of any activity, including the effects of land uses on freshwater, would not be an efficient and effective option under s32 of the Act.
52. Unfortunately, the relief sought in the NZPork submission does not include any suggested amendments to the wording of Objective 2.2.2 (1). However, given a district plan must give effect to the NPS-FM in my view it would be reasonable for any party reading the submission to anticipate that Objective 2.2.2(1) may be amended to reflect the direction in clause 3.5(4) of the NPS-FM.
53. Therefore, my recommendation is to amend Objective 2.2.2(1) by striking out and adding in the underlined text below, so it reads:
- “~~Subdivisional No land use~~ Urban development is managed in a way that promotes the positive effects, while avoiding, remedying or mitigating adverse effects (including cumulative effects) ....”
54. Also, I note Strategic Direction 2 is called Freshwater Quality/Te Mana o Te Wai. The concept of te mana o te wai,

the direction in clause 3.5(4) of the NPS–FM and Objective 2.2.2(1), all applying more broadly than to freshwater quality. I recommend amending the heading to reflect that broader focus. In my view this could be done as a minor amendment under clause 16 of Schedule 1 to the Act.

Policy 2.2.3 (4)

55. Objective 2.2.2 is achieved by Policy 2.2.3. This policy includes 6 clauses. NZPork has submitted opposing clause 4 in part, stating that without a comprehensive planning response the policy cannot be understood.
56. Clause 4 reads: *“Recognise the benefits of subdivision, land use and development activities which will directly contribute to the enhancement of freshwater quality.”*
57. The S42A Report does not discuss this submission point separately.
58. I read the policy meaning the Council will encourage and support land use activities that restore or enhance freshwater quality, presumably using various methods. However, I do agree, the policy would be clearer if part of a comprehensive plan review.
59. Unfortunately, the submission does not seek any specific amendments or changes to the wording of the policy and I am not sure anyone reading the NZPork submission would be able to anticipate how the policy may be altered by accepting the submission.

Policy 2.2.3 (5)

60. Policy 2.2.3(5) reads: *“Manage subdivision, use and development of land in a manner that restores, protects and enhances mana, mauri, health and well-being of the district's lakes, rivers and all other waterways.”*
61. NZPork has opposed this clause in part, again asking for clarity around how the policy may apply to land uses in rural areas, relative to regional rules.
62. The S42A Report has not addressed this specific submission point.
63. I do not agree there is an issue with the policy being outside of the Council's functions under the Act. However, it is potentially beyond the directions given to territorial

authorities in clause 3.5(4) of the NPS – FM and, depending on the methods used to implement the policy, could duplicate provisions in regional plans.

#### **STRATEGIC DIRECTION 4 – CLIMATE CHANGE**

64. Strategic Direction 4 deals with climate change. Objective 2.4.2 has three clauses, and Policy 2.4.3 has four clauses.

##### Objective 2.4.2

65. NZPork has submitted supporting Objective 2.2.4 in part, asking to keep clauses 2 and 3 as written and requesting clarification of how clause 1 will relate to land use activities in the district which produce greenhouse gases.
66. Clause 1 reads: "*Subdivision, use and development of land in the Taupō District will result in positive climate change outcomes.*"
67. The S42A Report addresses the submissions on this strategic direction at paragraphs 179-182. It notes that the objective and policy are intended to provide high level guidance to inform plan development and resource consent decision-making and suggests application of the provisions will be on a case-by-case nature.
68. The S42A Report states that while Policy 2.4.3(1) is to support and encourage land uses which will result in positive climate change outcomes, there is no policy to oppose or discourage activities which do not.
69. The effects of climate change is a matter to have regard to in achieving the purpose of the Act under s7(i), however there is not a lot of guidance around how that duty translates into regional and district plan provisions.
70. In my opinion, there are several matters that need to be considered in drafting provisions to address the effects of climate change.
71. Firstly, New Zealand contributes 0.017% of global greenhouse gas emissions ([www.mfe.govt.nz](http://www.mfe.govt.nz)). Therefore, no land use in New Zealand is going to result in positive (or negative) climate change outcomes per se. Rather it will contribute positively, neutrally or negatively to New Zealand's greenhouse gas emissions profile.
72. Secondly, policy to reduce climate change emissions in New Zealand needs to result in fewer emissions per se, not result in

transference of and increased emissions elsewhere as this will have an overall adverse effect on climate change.

73. Thirdly, resilience and adaption to climate change are key aspects as well as greenhouse gas emissions. This is recognised in Objective 2.4.2 (2) and (3) but the focus in policy 2.4.3 is on emissions, with only one clause relating to adaptation and resilience and then only as it applies to subdivision and development of land. There is no policy around modelling and understanding potential impacts of climate change on existing communities, transport and infrastructure networks, ecosystems or rural land uses.
74. Climate change needs to be managed 'cradle to grave' and alongside other environment effects. For example, under Policy 2.4.3(1) monocultural planting of areas in exotic forestry to absorb carbon, or development of renewable energy generation infrastructure is supported and encouraged. However, depending on where the activity occurs, it may have potentially significant adverse effects. In my view, these effects need to be addressed to achieve the purpose of the Act.
75. In my opinion, Objective 2.4.2 would be clearer if it was replaced with two objectives: one around understanding greenhouse gas emission footprints and minimising them; and a second objective around understanding the potential impacts of climate change and focusing on resilience and adaption.
76. My suggestion would be to replace Objective 2.4.2(1) with a clause that reads: "The contribution of new land uses and developments in Taupō District to greenhouse gas emissions and potential climate change are understood and minimised."
77. Unfortunately, I do not think there is scope in the NZPork submission to make an amendment of this type.

#### Policy 2.4.3(2)

78. NZPork also opposed Policy 2.4.3(2) in part and asked for clarification on how it will apply to individual land-based activities. Policy 2.4.3(2) reads: "Land use activities which will unduly accelerate the effects of climate change will be discouraged."
79. The S42A Report posits that 'unduly' in this context means that some land use activities may not have options to do otherwise than contribute to climate change due to the nature of the development or its location. However, that is not stated in the policy.

80. I would also suggest that these qualifiers of 'unduly' negate the efficacy of policy. There are only two ways an activity contributes to climate change: by its nature, its location (or both). If these matters are excluded from Policy 2.4.3(2) then, in my opinion, the policy will not achieve Objective 2.4.2(1).
81. The S42A Report also argues that the policy will not affect lawfully established activities which have an existing use right. No amendments are recommended to the policy.
82. In my view, the meaning and application of Policy 2.4.3(2) needs clarifying. As written, it begs the question how 'unduly accelerating the effects of climate change' will be determined. For example, is a new airport or heliport, or a new motorway, accelerating the effects of climate change? What about a new retail precinct or tourist facility that people fly or drive to? Does this position change if they are driving EVs? What if the EVs are refuelled using electricity from a thermal power station?
83. Similarly, does a new abattoir or dairy factory that results in an increase in pastoral farming in the district? What if the location of that abattoir or dairy factory reduced the number of kilometres product had to travel to be processed? What if the abattoir kills pigs and poultry as well as red meat?
84. My point is that beyond the most obvious activities, trying to determine the impact on any land use on climate change can become complex, quickly.
85. That is not to say there is no place in land use planning to consider and reduce high emitting activities. There is clearly a role in considering land uses and transport demand; in planning for renewable energy generation; and in allowing land use change. However, without knowing the policies, and methods, including rules, that will implement these strategic directions, it is hard to underestimate what the implications of this provision will be.
86. In addition, GHG Emission Budgets are prepared under the Climate Change Response (0-Carbon) Amendment Act 2019. These budgets include targets for reducing greenhouse gas emissions from various sectors, and methods to achieve those reductions, including levies or taxes, offsets and research and development.
87. I do not agree with the S42A Report that the policy will not impact on existing lawfully established land uses. Under s10 of the Act, a land use may occur that contravenes a rule in a plan or proposed plan if it was lawfully established before

the plan was notified and the effects are the same or similar in character, intensity and scale. Uncertainty arises if one expands the existing use, e.g., increasing the number of flights to an airport or the number of ruminant animals on a farm.

88. Therefore, my suggestion would be to focus on increasing people's awareness of GHG footprints from new land use developments in the District and encouraging or requiring all activities to minimise their GHG emissions. Unfortunately, there is not scope within the relief sought in the NZPork submission to make amendments of this type.

### **NEW STRATEGIC DIRECTION – RURAL ENVIRONMENTS**

89. NZPork has requested a new strategic direction, objective and policies to address significant resource management issues in rural areas, including provisions relating to well-being, productive capacity and reverse sensitivity.
90. The S42A Report addresses this submission in section 4.2.1, paragraphs 33-36. The S42A Report refers to the Council's strategic document TD2050 2018, which seeks to protect the effective functioning of the rural environment and is referenced in Objective 2.3.2(2).
91. The S42A Report recommends amendments to Objective 2.3.2(2) to add a reference "to protect the effective functioning of the rural environment," and Policy 2.3.3(3) to read: "Avoid fragmented urban development that results in inefficient:
- a. Use of land
  - b. provision and functioning of infrastructure; and
  - c. functioning of the General Rural Environment."
92. I agree with the amendments to Strategic Objective 2.3.2(2) and Policy 2.3.3(3) in the S42A Report. These provisions address Urban Form and Development, and such activities do not occur on a blank canvass. Rather they often occur in and adjoining rural areas, and potentially affect rural land uses and communities.
93. However, I believe the submission from NZPork raises a broader issues than managing conflict from urban expansion. The submission requesting strategic planning for rural areas per se: recognising the needs of rural

communities and activities to not only continue, but to be able expand, develop and change.

94. Under the Act, rural areas are often managed as the 'default' zone for land that isn't residential, commercial or industrial. Within the rural area, specific places may be managed for particular values, e.g., ecology or landscape, but, in my view, we do not plan well for rural areas per se.
95. Most of Taupō District is rural ([www.taupodc.govt.nz](http://www.taupodc.govt.nz)) covering a range of geographies from mountain ranges and the central plateau to hills, lakes and rivers. Plan Change 42 notes that 70% of Taupō District's land area is rural.
96. The Council's website also acknowledges that the rural environment is a working environment hosting a range of activities from farming and forestry to industry and conservation. Yet there is no Strategic Directions in plan change 38 pertaining to planning for the rural area, rural activities or rural communities.
97. In my view, the management of conflict at the interface of urban expansion and rural land uses is not the sum of strategic direction required for rural environments. Nor, do I agree that Strategic Directions for the Natural Environment is sufficient to direct the management of the rural area. They both address issues which form subsets within the broader context of planning for the rural environment.
98. NZPork's submission includes suggested provisions for this new Strategic Direction, though it is not clear from the submission if they are intended to form an objective, policy or both. The requested provisions are:
  - "Taupō's rural environment contributes positively to the district's economic and social well-being."
  - "Rural land remains available for primary production activities and productive capacity is protected."
  - "Reverse sensitivity effects are managed so as not to constrain primary production activities."
  - "Rural lifestyle opportunities for rural lifestyle subdivision and development are only provided in parts of the rural environment where they do not conflict with enabling primary production and protecting the productive potential of land."



99. While not a comprehensive strategic direction for rural environments, in my view they provide a good starting point.
100. My recommendation is to add a new Strategic Direction 7 Rural Environments with an objective and policy based on the additions requested in the submission from NZPork.
101. I also support retaining the amendments to Strategic Objective 2.3.3(2) and Policy 2.3.3(3) recommend in the S42A Report. I do not regard these amendments as alternatives to those requested in the NZPork submission, but as complementary provisions. They provide an appropriate link between the Strategic Direction for Urban Form and Development and a new Strategic Direction for Rural Environments.

### **CONCLUSIONS**

102. NZPork has requested amendments to Objective 2.2.2(1) and Policy 2.2.3(4) and 2.2.3(5) relating to Freshwater Quality/Te Mana o Te Wai; and to Objective 2.4.2(1) and Policy 2.4.3(2) pertaining to Climate Change, and support for Objective 2.4.2(2) and (3).
103. The reasons for the amendments sought were to improve clarity, avoid duplication with regional rules, and align with the NPS-FM.
104. I agree that these provisions could be clearer but, in most cases, the ability to redraft them is limited by the scope of the relief sought in the NZPork submission. However, I do believe Objective 2.2.2(1) can and ought to be amended to align with the direction in clause 3.5(4) of the NPS-FM.
105. NZPork also requests a new Strategic Direction for rural environments. The S42A Report suggests an amendment to Objective 2.3.3(2) and Policy 2.3.3(3). I agree with the amendments recommended in the S42A Report but, in my view, they are insufficient on their own.
106. In my opinion it is appropriate that the plan includes strategic directions for the rural environment, which comprises the majority of the District. In my view, planning for a rural area involves more than managing conflict with urban development and protection of natural values. While my preference is for a more robust set of provisions, those requested in the NZPork submission better achieves the

purpose of the Act than the alternative option of not including them.

A handwritten signature in blue ink, appearing to read 'Lynda Murchison', with a long horizontal flourish extending to the right.

Lynda Murchison

10 August 2023

