



**BAY OF PLENTY
REGIONAL COUNCIL
TOI MOANA**

Submission Form

Send your submission to reach us by 4.00 pm on Wednesday, 18 April 2018

Submission Number
Office use only

062

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|--|-----------------------------|------------------------------------|
| Post: The Chief Executive Bay of Plenty Regional Council PO Box 364 Whakatane 3158 | or Fax: 0800 884 882 | or email: air@boprc.govt.nz |
|--|-----------------------------|------------------------------------|

Submitter Name: Craddock Farms Ltd

This is a submission on Proposed Plan Change 13 (Air Quality) to the Regional Natural Resources Plan

I ~~could~~ could not gain an advantage in trade competition through this submission. [Delete as required.]

- (a) I ~~am~~ am not directly affected by an effect of the subject matter of the submission that adversely affects the environment; and
(b) My submission ~~does~~ does not relate to trade competition or the effects of trade competition. [Delete the entire paragraph if you could not gain an advantage in trade competition through this submission.]
- The details of my submission are in the attached table. ~~and~~ and ~~compendium~~ attached.
- I wish ~~do not~~ wish to be heard in support of my submission. [Delete as required.]
- If others make a similar submission, I will consider presenting a joint case with them at a hearing. [Delete if you would not consider presenting a joint case.]

Robt of Stratum Consultants Ltd
[Signature of person making submission or person authorised to sign on behalf of person making submission.]
[NOTE: A signature is not required if you make your submission by electronic means.]
Date 18/04/18

Address for Service of Submitter:

Stratum Consultants Ltd
PO Box 878, ROTORUA 3040

Telephone:

Daytime: 07 347 7840

After Hours:

Email:

keala.patt@stratum.nz

Fax:

Contact person: [Name and Designation if applicable]

Kavita Puth

SUBMISSION POINTS:

| Page No | Reference (e.g. Policy, Rule, Method or Objective number) | Support/Oppose | Decision Sought Say what changes to the plan you would like | Give Reasons |
|---------|--|----------------|--|--------------|
| 15 | AQR 21 (j) | Oppose | See attached correspondence. | |
| | | | | |
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227845-R-P-C009

18 April 2018

Bay of Plenty Regional Council
PO Box 364
WHAKATANE

Email: air@boprc.govt.nz

Dear Sir/Madam,

SUBMISSION TO PC13 AIR QUALITY TO THE REGIONAL NATURAL RESOURCES PLAN

Our Client, Craddock Farms Limited (Craddock) is a free range poultry operator. Craddock has reviewed PC13 Air Quality to the Regional Natural Resources Plan and provide the following submission points:

- a) PC13 does not provide recognition of the existing consented and established free range poultry activities. Rule AQ R21(j) requires that all existing and new free range farming activities would require a Discretionary consent.

The activity status is Opposed for the following reasons:

- i) Discretionary consent is opposed as it requires additional consenting and compliance costs;
- ii) There are limited assessment criteria in PC13 relating to free range poultry activities which results in the applicant having a limited understanding of how any potential consent will be assessed;
- iii) Established activities have known environmental effects and it is unfair to require resource consent for lawfully established activities to require a Discretionary consent that could potentially be refused; and
- iv) Significant infrastructure and investment has been made at this site, and this activity and commitment now becomes uncertain due to Discretionary status.

Decision Sought:

- a) Provide for existing free range activities established at time of PC13 notification as Permitted activities; and
- b) Provide for new free range activities established after PC13 notification as Controlled or Restricted Discretionary activities with appropriate assessment criteria.
- c) Provide robust assessment criteria within PC13 for free range activities to ensure that the relevant effects of free range poultry activities will be assessed.

We attach the PC13 submission form. We wish to be heard at any Hearing.

Please contact us if you wish to discuss further.

Yours faithfully
Stratum Consultants Ltd



Karla Putt
Senior Planner
Attached: PC13 submission form

CC: Craddock Farms Limited

Planners | Engineers | Surveyors



