

SUBMISSION ON FAR NORTH DISTRICT COUNCIL PROPOSED DISTRICT PLAN

TO: Far North District Council
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BY EMAIL: pdp@fndc.govt.nz

SUBMISSION TO: Far North District Council Proposed District Plan

NAME OF SUBMITTER: Ballance Agri-Nutrients Limited

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This is a submission by Ballance Agri-Nutrients Limited¹ on the proposed District Plan.

Ballance cannot gain a trade competition advantage through this submission.

This submission is divided into two parts as follows:

Part A: Introduces Ballance, its activities and shareholders; and

Part B: Sets out the specific submissions and relief sought by Ballance.

Ballance seeks the relief set out in this submission, including such other additional, alternative or consequential relief as may be necessary to give effect to the changes sought.

Ballance wishes to be heard in support of this submission.

Signed for and on behalf of Ballance by



Dominic Adams

Environmental Manager

18th October 2022

¹ Hereafter referred to as 'Ballance'

Part A: Ballance Agri-Nutrients Limited

Ballance Agri-Nutrients Limited is a farmer-owned co-operative with over 19,000 shareholders and approximately 800 staff throughout New Zealand. We own and operate super-phosphate manufacturing plants located in Tauranga and Invercargill, as well as New Zealand's only ammonia-urea manufacturing plant located at Kapuni, South Taranaki.

In addition to manufacturing and sales Ballance provides farm sustainability services including nutrient management advice. We place a strong emphasis on delivering value to our shareholders and on the use of the best science to inform sustainable nutrient management.

Reinforcing this, Ballance has extensive interest in the development of tools to manage nutrient losses on farms. Ballance, with Ag Research, has undertaken extensive research into 'MitAgator' which is a GIS-based water quality decision support tool that links with OVERSEER® to refine the latter models output. The use of management tools such as MitAgator, provides greater insight into the spatial variability of nutrient (as well as sediment and microbial) loss within a farm landscape and allows users to identify critical source areas (or 'hot spots') for nitrogen, phosphorus, sediment and microbial loss across their own farm. Targeted application of mitigation and management strategies to these critical source areas help to provide more cost-effective environmental management solutions for farmers, while ensuring that effective water quality outcomes can be achieved in timeframes that recognise the socio-economic impacts of changing farm management practices.

The Company also owns and operates 'SealesWinslow' (a high-performance compound feed manufacturer) and the agricultural aviation company 'Super Air'.

The majority of our concerns in relation to the proposed District Plan relate to our Super Air operation. Super Air is the largest topdressing company in New Zealand and runs state of the art aircraft utilising the SpreadSmart system which uses geospatial referencing and computer controlled hydraulics to deliver market leading product placement. Super Air has a growing clientele in the Far North area.

Ballance supports the intent of the proposed District Plan which has an overall aim to manage natural and physical resources that are important in the district and to ensure that environmental qualities and values are safeguarded for future generations to enjoy. Ballance recognises that safeguarding the environment and ensuring our interactions will enable a resilient economy that can thrive, is a priority for New Zealand and we also recognize that farmers support this - with a large number of them, whom we are involved with, already implementing measures and planning further mitigations to reduce nutrient and contaminant losses from their farms.

Our main points of concern are to ensure that the proposed District Plan does not lead to any unintended negative impacts on the area's environment, and economic and social aspirations. In particular we recommend clarifying the ability of agricultural aviation (including helicopters and fixed-wing aircraft) to continue to support the district's primary production without undue restriction. Overall we are very supportive of the proposed District Plan but highlight below the need for including adequate allowance for agricultural aviation activities. We support the proposed plan's recognition of the need to protect primary production and associated activities in the Rural Production Zone. We agree that primary production is central to the social, economic and cultural well-being of the Far North District. Food production systems need to be optimised and supported by suitable regional and district policies to help establish a resilient primary sector which will form an integral part of the success of any region in New Zealand.

Part B of this submission addresses the parts of the proposed District Plan that are relevant to the interests of Ballance.

Part B: Reasons for Submission and Decisions Sought by Ballance Agri-Nutrients Limited

Plan Section	Provision	Clause	Support/ Oppose	Reason	Decision sought	
S143.001	Definitions	AGRICULTURAL AVIATION ACTIVITIES	New definition	n/a	Ballance seeks to have agricultural aviation defined to include primary production, biosecurity, and conservation activities undertaken by agricultural aviation	Add a new definition: Agricultural aviation activities; means the intermittent operation of an aircraft (including fixed-wing aeroplanes and helicopters) from a rural airstrip or helicopter landing area for primary production activities, and; conservation activities for biosecurity, or biodiversity purposes; including stock management, and the application of fertiliser, agrichemicals, or vertebrate toxic agents (VTA's).
S143.002	District-wide matters Strategic Direction Rural environment	SD-RE-01	Primary production activities are able to operate efficiently and effectively and the contribution they make to the economic and social well-being and prosperity of the district is recognised.	Support	Ballance supports enabling strategies so that Primary production activities can continue to operate efficiently and effectively	Retain the strategy
S143.003	District-wide matters Strategic Direction Rural environment	SD-RE-02	Protection of highly productive land from inappropriate development to ensure its production potential for generations to come.	Support	Ballance supports the protection of highly productive land in the Far North District	Retain the strategy
S143.004	District-wide matters Strategic Direction Natural environment	SD-EP-03	Active management of ecosystems to protect, maintain and increase indigenous biodiversity for future generations.	Support	Ballance supports protecting ecosystems particularly via weed and pest control	Retain the strategy
S143.005	District-wide matters NATURAL ENVIRONMENT VALUES Ecosystems and indigenous biodiversity	IB-P5	Ensure that the management of land use and subdivision to protect Significant Natural Areas and maintain indigenous biodiversity is done in a way that: <ul style="list-style-type: none"> a. does not impose unreasonable restrictions on existing primary production activities, particularly on highly versatile soils; b. recognises the operational need and functional need of some activities, including regionally significant infrastructure, to be located within Significant Natural Areas in some circumstances; c. allows for maintenance, use and operation of existing structures, including infrastructure; and d. enables Māori land to be used and developed to support the social, economic and cultural well-being of tangata whenua, including the provision of papakāinga, marae and associated residential units and infrastructure. 	Support	Ballance supports policies that do not impose unreasonable restrictions on existing primary production activities	Retain the policy

	Plan Section	Provision	Clause	Support/ Oppose	Reason	Decision sought
S143.006	District-wide matters NATURAL ENVIRONMENT VALUES Ecosystems and indigenous biodiversity	IB-P7	Encourage and support active management of pest plants and pest animals.	Support	Ballance supports policies that actively support and provide for the management of pest plants and pest animals to enhance biodiversity values	Retain the policy
S143.007	General District Wide Matters Noise	NOISE-O1	Activities generate noise effects that are compatible with the role, function and character of each zone and do not compromise community health, safety and wellbeing.	Support	Ballance supports the recognition of noisy activities that are compatible with the role, function and character of the General Rural Zone such as agricultural aviation and the operation of rural airstrips.	Retain the objective
S143.008	General District Wide Matters Noise	NOISE-O2	New noise sensitive activities are designed and/or located to minimise conflict and reverse sensitivity effects.	Support	Ballance supports the recognition that existing noisy activities, especially in the General Rural Zone, should be protected from reverse sensitivity effects.	Retain the objective
S143.009	General District Wide Matters Noise	NOISE-RX	New rule	n/a	Ballance seeks to have a specific Permitted Activity rule for agricultural aviation to ensure these activities are adequately provided for in the District Plan. Agricultural aircraft landing and taking off from rural airstrips is a vital activity for support of agricultural production as well as conservation. Agricultural aircraft movements of fixed-wing aircraft spreading fertiliser for example, are governed by: the volume of product that can be safely held in the aircraft's hopper; weather conditions; and seasonal requirements (for fertiliser as well as pesticide spraying etc). It is important for the district's agricultural production that agricultural aviation is appropriately provided for within the District Plan.	Include a new rule: NOISE-RX Agricultural aviation activities Rural production zone Horticulture Zone Open Space and Recreation Zone Natural Open Space Zone Agricultural aviation activities for the purpose of farming, forestry or conservation on a seasonal, temporary or intermittent basis meets the relevant requirements of standard NOISE-S1.
S143.010	General District Wide Matters Temporary Activities	TA-R5 Aircraft and helicopter movements (landing and take-off)	Activity status: Permitted Where: PER-1 The movement is for emergency services (including civil defence), military or conservation activities.	Support in part	Ballance seeks to have agricultural aviation activities provided for under a new rule (NOISE-RX). It should be clear that TA-R5 does not apply to agricultural aviation.	Include a new rule (as above): NOISE-RX Agricultural aviation activities
S143.011	Area-specific matters General Rural Zone Rural Production	RPROZ-O1	The Rural Production zone is managed to ensure its availability for primary production activities and its long-term protection for current and future generations.	Support	Ballance supports recognising the importance of primary production and its long-term protection.	Retain the objective
S143.012	Area-specific matters General Rural Zone Rural Production	RPROZ-O2	The Rural Production zone is used for primary production activities, ancillary activities that support primary production and other compatible activities that have a functional need to be in a rural environment.	Support	Ballance supports recognising the importance of ancillary activities (such as agricultural aviation) that support primary production.	Retain the objective
S143.013	Area-specific matters General Rural Zone Rural Production	RPROZ-O3	Land use and subdivision in the Rural Production zone: a. protects highly productive land from sterilisation and enables it to be used for more productive forms of primary production; b. protects primary production activities from reverse sensitivity effects that may constrain their effective and efficient operation;	Support	Ballance supports the protection of highly productive land and the protection of primary production activities from reverse sensitivity effects	Retain the objective

Plan Section	Provision	Clause	Support/ Oppose	Reason	Decision sought	
		<ul style="list-style-type: none"> c. does not compromise the use of land for farming activities, particularly on highly productive land; d. does not exacerbate any natural hazards; and e. is able to be serviced by on-site infrastructure. 				
S143.014	Area-specific matters General Rural Zone Rural Production	RPROZ-P1	Enable primary production activities, provided they internalise adverse effects onsite where practicable, while recognising that typical adverse effects associated with primary production should be anticipated and accepted within the Rural Production zone.	Support	Ballance supports the enabling of primary production and recognition that typical adverse effects should be anticipated and expected within the Rural production Zone	Retain the policy
S143.015	Area-specific matters General Rural Zone Rural Production	RPROZ-P2	Ensure the Rural Production zone provides for activities that require a rural location by: <ul style="list-style-type: none"> a. enabling primary production activities as the predominant land use; b. enabling a range of compatible activities that support primary production activities, including ancillary activities, rural produce manufacturing, rural produce retail, visitor accommodation and home businesses. 	Support	Ballance supports the enabling and recognition of primary production as the predominant land use in the Rural Production Zone as well as the importance of enabling ancillary activities (such as agricultural aviation).	Retain the policy
S143.016	Area-specific matters General Rural Zone Rural Production	RPROZ-P3	Manage the establishment, design and location of new sensitive activities and other non-productive activities in the Rural Production Zone to avoid where possible, or otherwise mitigate, reverse sensitivity effects on primary production activities.	Support	Ballance supports ensuring that reverse sensitivities and non-productive activities do not impact on primary production and associated ancillary activities	Retain the policy
S143.017	Area-specific matters General Rural Zone Rural Production	RPROZ-P4	Land use and subdivision activities are undertaken in a manner that maintains or enhances the rural character and amenity of the Rural Production zone, which includes: <ul style="list-style-type: none"> a. a predominance of primary production activities; b. low density development with generally low site coverage of buildings or structures; c. typical adverse effects such as odour, noise and dust associated with a rural working environment; and d. a diverse range of rural environments, rural character and amenity values throughout the District. 	Support	Ballance supports ensuring that subdivision maintains or enhances the rural character of the Rural production Zone including noise and dust associated with the rural environment	Retain the policy

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