

RPS

From: Graeme Mathieson <graeme.mathieson@mitchelldaysh.co.nz>
Sent: Friday, 3 September 2021 2:30 p.m.
To: RPS
Cc: John Coxhead (John.Coxhead@agresearch.co.nz)
Subject: AgResearch Submission - Proposed Otago Regional Policy Statement 2021
Attachments: AgResearch Submission Proposed Otago RPS (Final 090321).pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Submission - Sector stakeholder

Dear Sir/Madam

On behalf of my client AgResearch Limited, please find attached a submission in relation to the Proposed Otago Regional Policy Statement 2021.

Please do not hesitate to contact me if you wish to discuss any aspect of the submission, have any queries or require any further information.

Regards - Graeme

 **Graeme Mathieson**
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FORM 5

AGRESEARCH LIMITED SUBMISSION ON THE PROPOSED OTAGO REGIONAL POLICY STATEMENT 2021

Clause 6 of Schedule 1, Resource Management Act 1991

To: Otago Regional Council

Submitter: AgResearch Limited (“**AgResearch**”)

1. This is a submission on the Proposed Otago Regional Policy Statement 2021 (“**Proposed RPS**”).
2. AgResearch could not gain an advantage in trade competition through this submission.
3. AgResearch is directly affected by an effect of the subject matter of the submission that:
 - a) adversely affects the environment; and
 - b) does not relate to trade competition or the effects of trade competition
4. AgResearch’s general submission is summarised in section 7 below. It’s submissions on various provisions of the Proposed RPS, and the specific relief sought, are set out within the table in Attachment A.
5. AgResearch does wish to be heard in support of its submission.
6. If others make a similar submission, AgResearch will consider presenting a joint case with them at a hearing

Signature AGRESEARCH LIMITED
By its authorised agents Mitchell Daysh Limited



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Date 3 September 2021

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7 General Submission

- 7.1 AgResearch is New Zealand's largest Crown Research Institute with four Research Campuses (including Invermay) and nine Research Farms, employing approximately 750 staff nationwide. Formerly known as the New Zealand Pastoral Agriculture Research Institute Limited, it was created as a CRI in 1992 out of the research arm of the Ministry of Agriculture and Fisheries (MAF) and the agriculture section of the Department of Scientific and Industrial Research (DSIR).
- 7.2 AgResearch's purpose is to enhance the value, productivity and profitability of New Zealand's pastoral, agri-food and agri-technology sector value chains to contribute to economic growth and beneficial environmental and social outcomes for New Zealand. This sector is the backbone of New Zealand's economy and its continued success is essential to this country's living standards. AgResearch's research facilities are a significant contributor to this purpose, providing multi-decade information on long term impacts of farming practices, environmental changes and resulting farm system responses.
- 7.3 The Company works with stakeholders to develop leading-edge scientific solutions for a range of national and international customers, including government agencies, industry bodies and private companies. AgResearch is the lead CRI in the areas of pasture based animal production systems, new pasture plant varieties, agricultural-derived greenhouse gas mitigation and pastoral climate change adaption, agri-food and bio-based products and agri-technologies and integrated social and biophysical research to support pastoral sector development. The research undertaken by AgResearch is of national significance to the agricultural sector (including the research undertaken at Invermay as discussed further below).
- 7.4 Within the Otago Region, AgResearch owns and operates the Invermay Research Centre ("**Invermay**") which is located on Puddle Alley, on the eastern outskirts of Mosgiel. Invermay consists of a Research Campus and two research farms. The facility was originally established as a Regional Agricultural Research Station in 1949 by the Fields (Advisory) Division of Department of Agriculture to investigate local farming problems (sheep and dairy). In 1973, deer were introduced to Invermay and a comprehensive research programme was developed run in close cooperation with the deer farming community. The Campus was opened in 1986 and is located within a 25 hectare site. The primary research farm is located adjacent to the Campus and is approximately 510 hectares. A second smaller (50 hectare) research farm is located approximately 400m north of the main research farm, with access from Silverstream Valley Road.
- 7.5 While AgResearch owns the Invermay site, other research organisations who are tenants include Primary ITO, Gribbles Veterinary Pathology, Oritain, Asurequality, VetEquine and Deer Industry. In 2008, the Centre for Reproduction and Genomics was established at Invermay in conjunction with the University of Otago.
- 7.6 Research at Invermay has an emphasis on animal molecular biology (particularly genomics), deer, sheep, land management, biocontrol and biosecurity. The research undertaken is of regional and national significance to the agricultural sector. AgResearch is promoting the development of the Invermay Campus as an "*Agricultural Science Innovation Precinct*" to potential suitable tenants and partners (consistent with the Dunedin Economic Development Strategy ("**Dunedin EDS**")). For example, the Dunedin EDS includes the following specific initiative to achieve the key "*Action*" of "*Grow innovative and internationally competitive industries and clusters in Dunedin*" (under the overarching "*Alliances for Innovation*" Strategic Theme):

*Ensuring our innovation support mechanisms are appropriately structured and coordinated.
Create action plans to build scale in internationally competing industries (for example,
through clusters, precincts, improving connections to R&D expertise). This will include...*

- *...Developing an agricultural science innovation precinct at the Invermay Agricultural Research Campus, and better connecting businesses to the R&D expertise that exists at AgResearch.*

- 7.7 The Dunedin EDS policy direction of developing Invermay as an “*Agricultural Science Innovation Precinct*” is well supported by the planning provisions in the Proposed 2GP. The Invermay Campus is located within a site-specific Invermay and Hercus Major Facility Zone (approximately 25 hectares), while both the Invermay and Waiora Research Farms are zoned Rural Taieri Plain but each are specifically identified as “Invermay Farm” on the planning maps with additional site specific rules. A broad range of research, training, and education related activities are provided for as permitted activities within both the Campus and the research farms.
- 7.8 A key concern of AgResearch is the potential for reverse sensitivity effects on the Invermay Research Centre (Campus and research farms) arising from the establishment of incompatible activities in close proximity (e.g. urban expansion, new residential and rural residential areas and other “sensitive activities”). The key concern is the potential for reverse sensitivity effects on AgResearch’s existing and future activities which would not enable the efficient use of AgResearch’s core science capability, assets, operations and resources. For example, if a new residential area was to developed near the main research farm (e.g. as a result of expanding Mosgiel), the resultant influx of new residents could result in increased complaints or concerns about cross-boundary effects (e.g. noise, dust, odour) from AgResearch’s existing and future activities such as:
- (a) buildings housing research animals;
 - (b) commercial or industrial research activities;
 - (c) harvesting and cultivation of crops or forestry;
 - (d) application of fertilisers and agrichemicals;
 - (e) heavy farm machinery; and
 - (f) a change of land use (e.g. spray irrigation of water or effluent).
- 7.9 It is also noted that the Duncan New Zealand Venison Abattoir is located on the main research farm within the flat pastoral area closest to Mosgiel.
- 7.10 In addition, Otago Regional Council (or Dunedin City Council) could follow the example of some other Councils and introduce new planning rules requiring substantial setbacks from residential areas for some typical rural activities (e.g. wastewater treatment ponds, buildings housing farm animals, rural industry). By way of example, the Canterbury Air Regional Plan requires a 1000m setback for buildings housing 30 or more cattle from Residential Zones and a 500m setback from “sensitive activities” (e.g. houses, schools, community facilities), otherwise an air discharge permit is required. Allowing the establishment a new residential area in the vicinity of the Invermay Farm could result in AgResearch requiring resource consent for activities that are currently permitted (with residents within any setback requirement considered a “potentially affected party”).
- 7.11 AgResearch is concerned that changing the character of land near to the Invermay Campus or research farms to urban (e.g. residential) or rural residential could result in:

- (a) objections or complaints about the activities of AgResearch (or future tenants) on the basis that they are incompatible with a residential or rural residential area;
- (b) the need for resource consents for activities that do not currently require resource consent; and
- (c) opposition to any resource consent applications required by AgResearch (or future tenants) resulting in additional costs, delays and uncertainty.

7.12 Objections or complaints about AgResearch’s activities as a result of new incompatible neighbours can lead to constraints on existing operations and potential future development or expansion. The additional consenting risks associated with such reverse sensitivity effects can result in investment decisions being made by national organisations like AgResearch to focus growth elsewhere in New Zealand, where the planning framework provides greater certainty.

7.13 Another key concern of AgResearch relates to new planning provisions potentially restricting the ability to continue utilising rural areas of “highly productive land” for research purposes. As noted in SRMR-14 within the Proposed RPS, the rural land surrounding Mosgiel includes some of Otago’s most highly productive soil, and both the Invermay Campus and associated research farms are located on these soils. It is essential that AgResearch retains the ability to continue to utilise “highly productive land” for research purposes because of the eventual commercial application and economic benefits for the regional and national pastoral, agri-food and agri-technology sector.

7.14 AgResearch agrees with the key policy direction of the Proposed RPS to maintain existing rural areas (particularly areas of highly productive land) primarily for “primary production”. However, agricultural research activities do not fit neatly within the ambit of the definition of “primary production”. For example, while research farms appear similar to any other farm and can have a commercial farming component, they are predominantly utilised for research purposes and therefore can contain research related activities and facilities (e.g. offices, laboratories, buildings housing research animals, animal handling facilities, education facilities (e.g. for visiting students), commercial or industrial pilot plant research facilities). Similarly, the Research Campus is not a “primary production activity”. While the Proposed RPS includes some provision for activities which support, service or are dependent on primary production and have an operational need to locate in rural areas, AgResearch considers these provisions could be improved particularly in relation to ensuring that rural research activities are clearly contemplated and provided for in rural areas (including in areas of highly productive land).

7.15 In summary, AgResearch’s is seeking a number of changes to the Proposed RPS policy framework primarily to ensure that:

- a) Existing and future rural research activities are not constrained by reverse sensitivity effects arising from the establishment of nearby incompatible activities (e.g. urban expansion, new residential and rural residential areas and other “sensitive activities”).
- b) Rural research activities are clearly provided for as an essential and appropriate activity within rural areas (including areas of “highly productive land”).

8 SPECIFIC SUBMISSION POINTS

8.1 AgResearch’s specific submission points are provided in **Attachment A**.

8.2 In respect of all of those submission points in **Attachment A**, AgResearch seeks:

- Where specific wording has been proposed, words or provisions to similar effect;

- All necessary and consequential amendments, including any amendments to the provisions themselves or to other provisions linked to those provisions submitted on, and including any cross references in other chapters; and
- All further relief that are considered necessary to give effect to the concerns described above and in **Attachment A**.

ATTACHMENT A: AGRESEARCH'S SUBMISSION ON THE PROPOSED OTAGO REGIONAL POLICY STATEMENT 2021

REF	PROVISION	SUPPORT OPPOSE	AGRESEARCH'S REASONS	RELIEF SOUGHT
1	Definitions – introduction of definition for “ <i>rural research activities</i> ”	NA	<p>AgResearch is seeking a number of changes to the Proposed RPS policy framework to ensure that:</p> <ul style="list-style-type: none"> a) Existing and future rural research activities are not constrained by reverse sensitivity effects arising from the establishment of nearby incompatible activities (e.g. urban expansion, new residential and rural residential areas and other “sensitive activities”). b) Rural research activities are clearly provided for as an essential and appropriate activity within rural areas (including areas of “highly productive land”). <p>As the changes sought consistently refer to “<i>rural research activities</i>”, a definition is proposed for inclusion in the “Definitions” section.</p>	<p>In the “Definitions” section, add the following definition for “<i>Rural research activities</i>”:</p> <p><i>Land, buildings and facilities used for research and development associated with primary production activities, including (but not limited to) buildings and structures housing animals, field trials, education facilities, conference facilities, laboratories, pilot plants for research purposes, staff and administrative offices and facilities, visitor facilities, field days, and any ancillary activities and accessory buildings.</i></p>
2	SRMR-14, Impact Snapshot, Environmental	Support in part	<p>AgResearch seeks changes to better reflect the relevant supporting policy framework (including changes sought by AgResearch) so it is clearer that urban development can lead to reverse sensitivity effects on a full range of existing or potential primary production related activities, as well as on critical rural activities which support, service or are dependent on primary production and have an operational need to locate in rural areas (e.g. rural research activities, rural industry). It is essential that AgResearch retains the ability to continue to utilise rural areas for research purposes because of the eventual commercial application and economic benefits for the national pastoral, agri-food and agri-technology sector.</p>	<p>Amend the first sentence of the second paragraph in the “Environmental” subsection of the “Impact Snapshot” section of SRMS-14 as follows:</p> <p><i>Urban development can also lead to reverse-sensitivity effects on existing or potential whereby traditional methods of pest management or the undertaking of rural primary production activities in rural areas or supporting activities that have an operational need to locate in these areas (e.g. rural research, rural industry) cannot be deployed due to the proximity of new urban populations and the potential for adverse impacts on those populations.</i></p>

REF	PROVISION	SUPPORT OPPOSE	AGRESEARCH'S REASONS	RELIEF SOUGHT
3	Policy AIR-P5 – Managing certain discharges	Support	<p>Policy AIR-P5 states:</p> <p><i>Manage the effects of discharges to air beyond the boundary of the property of origin from activities that include but are not limited to:</i></p> <p>(1) <i>outdoor burning of organic material,</i> (2) <i>agrichemical and fertiliser spraying,</i> (3) <i>farming activities,</i> (4) <i>activities that produce dust, and</i> (5) <i>industrial and trade activities.</i></p> <p>AgResearch supports that supports that Policy AIR-P5 focuses on managing the effects of air discharges beyond the property of origin.</p>	Retain Policy AIR-P5.
4	Objective LF-LS-O11 (Land and Soil)	Support in part	<p>AgResearch supports Objective LF-LS-O11 on the basis that it is prudent to maintain the availability and productive capacity of highly productive land for primary production to sustain the significant farming industry in the Otago Region. AgResearch is seeking changes to Policy LF-LS-P19 to better recognise and provide for critical rural activities which support, service or are dependent on primary production and have an operational need to locate in rural areas including on highly productive land (e.g. rural research activities, rural industry). It is essential that AgResearch retains the ability to continue to utilise “highly productive land” for research purposes because of the eventual commercial application and economic benefits for the national pastoral, agri-food and agri-technology sector. Amendments are sought to Objective LF-LS-O11 to reflect these changes.</p>	<p>Amend Objective LF-LS-O11 as follows:</p> <p><i>The life-supporting capacity of Otago’s soil resources is safeguarded and the availability and productive capacity of highly productive land for primary production (and supporting activities) is maintained now and for future generations.</i></p>

REF	PROVISION	SUPPORT OPPOSE	AGRESEARCH'S REASONS	RELIEF SOUGHT
5	Policy LF-LS-P19 (Highly productive land)	Support in part	AgResearch supports Policy LF-LS-P19 on the basis that it is prudent to protect areas of highly productive land for primary production to sustain the significant farming industry in the Otago Region. However, AgResearch considers that the Policy also needs to recognise that critical rural activities which support, service or are dependent on primary production and have an operational need to locate in rural areas including on highly productive land (e.g. rural research activities, rural industry). It is essential that AgResearch retains the ability to continue to utilise “highly productive land” for research purposes because of the eventual commercial application and economic benefits for the national pastoral, agri-food and agri-technology sector. The amendments sought would result in greater consistency with parallel provisions in Objective UFD–O4 and Policy UFD-P7.	Amend Policy LF-LS-P19 as follows: <i>Maintain the availability and productive capacity of high productive land by:</i> 1. <i>identifying highly productive land based on the following criteria:</i> a. <i>the capability and versatility of the land to support primary production based on the Land Use Capability classification system,</i> b. <i>the suitability of the climate for primary production, particularly crop production, and</i> c. <i>the size and cohesiveness of the area of land for use for primary production, and</i> 2. <i>prioritising the use of highly productive land for primary production ahead of other land uses (unless required for activities that support, service or are dependent on “primary production” and have an operational need to be located in rural areas (e.g. rural research activities, rural industry)), and</i> 3. <i>managing urban development in rural areas, including rural lifestyle and rural residential areas, in accordance with UFD–P4, UFD–P7 and UFD–P8.</i>
6	LF–LS–E4 (Explanation)	Support in part	AgResearch seeks that Explanation LF-LS-E4 be amended consistent with the changes sought to the policy framework to better recognise and provide for activities that directly, support, service or are dependent on primary production and have an operational need to be located in rural areas (including within areas of highly productive land) such as rural research activities and rural industry. It is essential that AgResearch retains the ability to continue to utilise “highly productive land” for research purposes because of the eventual commercial application and economic benefits for the national pastoral, agri-food and agri-technology sector.	Amend LF–LS–E4 – Explanation as follows: <i>Highly productive land is land used predominantly for primary production that provides economic and employment benefits. Providing for and managing such land types is essential to ensure its sustainability. The policies seek to:</i> <i>(a) identify and prioritise land used for primary productionve purposes and supporting activities that directly, support, service or are dependent on primary production and have an operational need to be located in rural areas (such as rural research activities, rural industry); and</i> <i>(b) managing urban encroachment into rural areas environments where appropriate.</i>

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			The Explanation also needs to be amended so there is consistent reference to primary production.	
7	Objective UFD–O4 (Development in rural areas)	Support in part	AgResearch supports Objective UFD-04, particularly on the basis that development in rural areas should primarily be directed away from those areas identified as highly productive land so it is retained predominantly for primary production purposes. AgResearch supports that clause (2) recognises that some development may have an operational need to locate in rural areas (including on highly productive land), but consistent with other changes sought to the policy framework, considers that any such development should also have a clear linkage to primary production (e.g. such as rural research activities undertaken at the Invermay Research Centre, rural industry). It is essential that AgResearch retains the ability to continue to utilise “highly productive land” for research purposes because of the eventual commercial application and economic benefits for the national pastoral, agri-food and agri-technology sector.	Amend Objective UFD–O4 as follows: <i>Development in Otago’s rural areas occurs in a way that:</i> 1. <i>avoids impacts on significant values and features identified in this RPS,</i> 2. <i>avoids as the first priority, land and soils identified as highly productive by LF-LS-P19 unless it directly supports, services or is dependent on “primary production” and there is an operational need for the development to be located in rural areas.</i> 3. <i>only provides for urban expansion, rural lifestyle and rural residential development and the establishment of sensitive activities, in locations identified through strategic planning or zoned within district plans as suitable for such development, and</i> 4. <i>outside of areas identified in (3), maintains and enhances the natural and physical resources that support the productive capacity, rural character, and long-term viability of the rural sector and rural communities.</i>
8	Policy UFD–P4 (Urban expansion)	Support in part	AgResearch generally supports Policy UFD-P4, in particular that clause (6) provides clear direction that urban expansion avoids (as a first priority) highly productive land. In terms of any new urban/rural interface, clause (7) requires consideration of reverse sensitivity effects on rural areas and existing or potential productive rural activities. AgResearch considers that Clause (7) should be amended to refer to reverse sensitivity effects on “primary production activities” (instead of “productive rural activities”) consistent with the National Planning Standards (and the terminology used throughout the Proposed RPS). AgResearch also considers that consideration of	Amend Policy UFD-P4 as follows: <i>Expansion of existing urban areas is facilitated where the expansion:...</i> 1. <i>contributes to establishing or maintaining the qualities of a well-functioning urban environment,</i> 2. <i>will not result in inefficient or sporadic patterns of settlement and residential growth,</i> 3. <i>is integrated efficiently and effectively with development infrastructure and additional infrastructure in a strategic, timely and co-ordinated way,</i> 4. <i>addresses issues of concern to iwi and hapū, including those identified in any relevant iwi planning documents,</i>

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			reverse sensitivity effects should not just apply to primary production activities, but should also apply to activities that directly support, service or are dependent on primary production, and have an operational need to be located in rural areas (e.g. rural research activities undertaken at the Invermay Research Centre, rural industry). It is essential that AgResearch retains the ability to continue to utilise rural areas for research purposes because of the eventual commercial application and economic benefits for the national pastoral, agri-food and agri-technology sector.	<p>5. <i>manages adverse effects on other values or resources identified by this RPS that require specific management or protection,</i></p> <p>6. <i>avoids, as the first priority, highly productive land identified in accordance with LF-LS-P19,</i></p> <p>7. <i>locates the new urban/rural zone boundary interface by considering:</i></p> <p>a) <i>adverse effects, particularly reverse sensitivity, on rural areas and existing or potential <u>primary production productive-rural activities or activities that directly support, service or are dependent on primary production and have an operational need to be located in rural areas (e.g. rural research activities, rural industry) beyond the new boundary, and</u></i></p> <p>b) <i>key natural or built barriers or physical features, significant values or features identified in this RPS, or cadastral boundaries that will result in a permanent, logical and defensible long-term limit beyond which further urban expansion is demonstrably inappropriate and unlikely, such that provision for future development infrastructure expansion and connectivity beyond the new boundary does not need to be provided for; or</i></p> <p>c) <i>reflects a short or medium term, intermediate or temporary zoning or infrastructure servicing boundary where provision for future development infrastructure expansion and connectivity should not be foreclosed, even if further expansion is not currently anticipated.</i></p>
9	Policy UFD-P7 (Rural areas)	Support in part	AgResearch supports Policy UFD-P7 on the basis that it is prudent to protect Otago's rural areas primarily for primary production, particularly those areas identified as "highly productive land". AgResearch supports that clause (4) recognises the need to facilitate "rural industry and supporting activities" within rural areas. However, there needs to be a clearer linkage to Objective UFD-04 which provides for development	<p>Amend Policy UFD-P7 as follows:</p> <p><i>The management of rural areas:</i></p> <p>1. <i>provides for the maintenance and, wherever possible, enhancement of important features and values identified by this RPS,</i></p> <p>2. <i>outside areas identified in (1), maintains the productive capacity, amenity and character of rural areas,</i></p>

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			<p>that has an “operational need” to locate in rural areas (including on highly productive land). Consistent with other changes sought to the policy framework, AgResearch considers that any such development should also have a clear linkage to primary production (e.g. activities which support, service or are dependent on primary production, such as rural research activities and rural industry). In addition, any such development should be “enabled” not “facilitated”.</p> <p>AgResearch supports the clause (6) requirement to restrict the establishment of residential activities, sensitive activities and non-rural businesses which could adversely affect (including by way of reverse sensitivity) the productive capacity of highly productive land, primary production and rural industry. However, for completeness, and consistent with other changes sought in the policy framework, in addition to protecting primary production and rural industry, clause (6) should also protect any activities that directly support, service or are dependent on primary production, and have an operational need to be located in rural areas (e.g. rural research activities undertaken at the Invermay Research Centre). It is essential that AgResearch retains the ability to continue to utilise rural areas for research purposes because of the eventual commercial application and economic benefits for the national pastoral, agri-food and agri-technology sector.</p>	<p>3. <i>enables primary production particularly on land or soils identified as highly productive in accordance with LF–LS–P19,</i></p> <p>4. <i>facilitates enables activities that directly, support, service or are dependent on primary production and have an operational need to be located in rural areas (e.g. rural research activities, rural industry and supporting activities),</i></p> <p>5. <i>directs rural residential and rural lifestyle development to areas zoned for that purpose in accordance with UFD–P8,</i></p> <p>6. <i>restricts the establishment of residential activities, sensitive activities, and non-rural businesses and activities which could adversely affect, including by way of reverse sensitivity, the productive capacity of highly productive land, primary production and activities that directly, support, service or are dependent on primary production and have an operational need to be located in rural areas (e.g. rural research activities, rural industry activities),– and</i></p> <p>7. <i>otherwise limits the establishment of residential activities, sensitive activities, and non-rural businesses to those that can demonstrate an operational need to be located in rural areas.–</i></p>
10	Amend Policy UFD-P8 (Rural lifestyle and rural residential zones)	Support in part	<p>AgResearch supports Policy UFD-P8 on the basis that it is prudent to protect Otago’s rural areas primarily for primary production, particularly those areas identified as “highly productive land”. AgResearch supports that clause (3) addresses potential reverse sensitivity</p>	<p>Amend Policy UFD-P8 as follows:</p> <p><i>The establishment, development or expansion of rural lifestyle and rural residential zones only occurs where:</i></p> <p>1. <i>the land is adjacent to existing or planned urban areas and ready access to employment and services is available,</i></p>

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			<p>effects arising from new or expanded rural lifestyle and rural residential zones. However, AgResearch considers that there needs to be a clearer linkage to Policy UFD—P7 (Rural Areas) where there is a clear priority placed on reserving rural areas for primary production activities and activities that have an operational need to locate in rural areas. Clause 6 of Policy UFD-P7 requires that rural areas are managed so that residential activities, sensitive activities and non rural businesses are restricted if they could have reverse sensitivity effects on primary production activities and rural industry. Consistent with other changes sought to the policy framework, AgResearch considers that new or expanded rural lifestyle and rural residential zones should be required to minimise reverse sensitivity effects on primary production activities and activities that directly, support, service or are dependent on primary production and have an operational need to be located in rural areas (e.g. rural research activities, rural industry). It is essential that AgResearch retains the ability to continue to utilise rural areas for research purposes because of the eventual commercial application and economic benefits for the national pastoral, agri-food and agri-technology sector.</p>	<ol style="list-style-type: none"> 2. <i>despite the direction in (1), also avoids land identified for future urban development in a relevant plan or land reasonably likely to be required for its future urban development potential, where the rural lifestyle or rural residential development would foreclose or reduce efficient realisation of that urban development potential,</i> 3. <i>minimises impacts on rural production potential, amenity values and the potential for reverse sensitivity effects to arise on primary production activities and activities that directly, support, service or are dependent on primary production and have an operational need to be located in rural areas (e.g. rural research activities, rural industry),</i> 4. <i>avoids, as the first priority, highly productive land identified in accordance with LF-LS-P16,</i> 5. <i>the suitability of the area to accommodate the proposed development is demonstrated, including:</i> <ol style="list-style-type: none"> a. <i>capacity for servicing by existing or planned development infrastructure (including self-servicing requirements),</i> b. <i>particular regard is given to the individual and cumulative impacts of domestic water supply, wastewater disposal, and stormwater management including self-servicing, on the receiving or supplying environment and impacts on capacity of development infrastructure, if provided, to meet other planned urban area demand, and</i> c. <i>likely future demands or implications for publicly funded services and additional infrastructure, and</i> 6. <i>provides for the maintenance and wherever possible, enhancement, of important features and values identified by this RPS.</i>