

AgResearch Limited Submission
Draft National Planning Standards

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I confirm that I am authorised on behalf of AgResearch Limited to make this submission.

1 OVERVIEW

- 1.1 AgResearch Limited (“AgResearch”) generally supports the direction of the Draft National Planning Standards subject to the amendments which are outlined in this submission.
- 1.2 In this submission we have provided:
 - General submissions on the Draft National Planning Standards (**Section 2**); and
 - Specific submission points on the Draft National Planning Standards, including relief requested (**Attachment A**).

2 GENERAL SUBMISSION

- 2.1 AgResearch is New Zealand’s largest Crown Research Institute (“CRI”) with four Agricultural Research Campuses and 11 Agricultural Research Farms, employing about 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).
- 2.2 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 our economy and its continued success is essential to this country's living standards.

- 2.3 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.
- 2.4 Historically, the majority of AgResearch's research facilities (e.g. Research Campuses and Research Farms) were provided for by way of designations (for "research purposes" or similar) in relevant District Plans (as a result of MAF and the DSIR having requiring authority status by being a government department). The effect of the designations was to enable agricultural research activities to be undertaken without the need for land use consent. When AgResearch was created as a CRI in 1992, it was no longer part of a government department, so did not have requiring authority status and the ability to designate.
- 2.5 To replace the use of designations, AgResearch has been actively seeking suitable zoning provisions that adequately recognise and provide for research related activities at the various Research Campuses and Research Farms (either during District Plan reviews or by way of private plan change applications).
- 2.6 The following table summarises the current zoning provisions relevant to each of AgResearch's research facilities:

Research Facility	District	District Plan Zoning Provisions
Ruakura Research Campus (and Research Farm)	Hamilton City	Knowledge Zone
Tokanui Dairy Research Farm	Waipa District	Scheduled site provisions in the Rural Zone
Grasslands Research Campus (and Research Farm) and Hopkirk Research Institute	Palmerston North City	Institutional Zone
Aorangi Research Farm	Manawatu District	Currently Rural Zone but in the process of seeking scheduled site provisions in an upcoming Rural Zone review.
Ballantrae Research Farm	Tararua District	Rural Zone
Woolfords Block	Rangitikei District	Scheduled site provisions in the Rural Zone (originally part of the Flockhouse Research Farm)
Kaitoke Research Farm	Upper Hutt City	Scheduled site provisions in the Rural Zone
Lincoln Research Campus	Selwyn District	Business 3 Zone
Lincoln Research Farms	Selwyn District	Outer Plains Zone
Winchmore Research Farm	Ashburton District	Scheduled site provisions in the Rural B Zone

Research Facility	District	District Plan Zoning Provisions
Invermay Research Campus	Dunedin City (in the Proposed Dunedin City District Plan (Proposed 2GP))	Major Facilities (Invermay and Hercus) Zone
Invermay Research Farms	Dunedin City (in the Proposed Dunedin City District Plan (Proposed 2GP))	Scheduled site provisions in the Rural Taieri Plains Zone
Woodlands Research Farm	Southland District	Scheduled site provisions in the Rural Zone

2.7 In terms of AgResearch's core Research Campuses (n.b. Ruakura, Grasslands, Lincoln and Invermay), all four are provided for by way of Special Purpose Zone (n.b. Knowledge Zone (for Ruakura), Institution Zone (for Grasslands), Business 3 Zone (for Lincoln) and Major Facilities (Invermay & Hercus) Zone for Invermay).

2.8 Each Special Purpose Zone not only provides for AgResearch's activities within the respective Research Campus, but also typically provides for a range of other research, innovation, education and other compatible activities either within the same Campus or located nearby in the general area.

2.9 For example, AgResearch's Grasslands Research Centre is located within the Institutional Zone in the Palmerston North City District Plan. However, the Institutional Zone also covers a range of other research, education and health institutions (and the New Zealand Fire Service) in the general area, including (but not limited to):

- (i) Massey University;
- (ii) Hokowhitu Campus;
- (iii) Plant and Food Research;
- (iv) Landcare Research;
- (v) Fonterra Research and Development Centre;
- (vi) New Zealand Agricultural Greenhouse Gas Research Centre;
- (vii) New Zealand Leather and Shoe Research Association; and
- (viii) Ministry of Primary Industries;
- (ix) Palmerston North, Ashhurst and Bunnythorpe Fire Stations;
- (x) Mid-Central Health Palmerston North Hospital and Crest on Carroll Street and Crest on Grey Street Private Hospitals.

2.10 Similarly, AgResearch's Ruakura Research Centre Campus is located within the Knowledge Zone within the Hamilton City District Plan which primarily provides for research, innovation and education related activities. A range of other research organisations are also located within the Ruakura Research Centre Campus, and the Tai Wananga Secondary School was established within existing Campus buildings in 2012. The Waikato Innovation Park and the University of Waikato are located near the Ruakura Research Campus and are also provided for within the Knowledge Zone. AgResearch is increasingly providing educational opportunities for visitors, school and tertiary students in relation to research and innovation activities undertaken.

- 2.11 A range of other research, innovation and education organisations are also located in or nearby AgResearch’s Lincoln and Invermay Research Campuses. The Lincoln Research Campus has the same Business 3 zoning as the nearby Lincoln University, and the two organisations undertake joint research ventures together. The Invermay Campus has the same Major Facilities zoning as the nearby University of Otago Hercus Taieri Resource Unit, and also undertakes research ventures with the University of Otago.
- 2.12 In terms of AgResearch’s Research Farms, two of the eleven Research Farms (n.b. Ruakura and Grasslands) have the same zoning as the corresponding Research Campus due to their relatively small size and close proximity. In terms of the remaining nine Research Farms, six are provided for by way of “scheduled site” provisions (within a Rural Zone), and the other three are zoned Rural with no scheduled site provisions (although it is noted that AgResearch is in the process of seeking scheduled site provisions for the Aorangi Research Farm as part of an upcoming review of the Rural Zone provisions in the Manawatu District Plan). Accordingly, the majority of AgResearch’s Research Farms are provided for by way of “scheduled site” provisions within a Rural Zone (similar to the Precinct approach referred to in Mandatory Directions 9-12 of the Draft National Planning Standards).
- 2.13 In the Draft National Planning Standards, Chapter S-ASM (Draft Area Specific Matters Standard), Discretionary Direction 8 specifies the different zones that a Council can choose to use in a District Plan. Mandatory Direction 6 states that a local authority may include additional special purpose zones in accordance with Direction 7. Mandatory Directions 9-12 provide for the use of “Precincts” within a zone, while Mandatory Directions 13-17 provide for the use of “Development Areas”.
- 2.14 AgResearch’s activities would not be adequately provided for within the Purpose Statement for any of the listed zones within Discretionary Direction 8. Accordingly, there would appear to be the following three options available in terms of ensuring that there are appropriate zoning provisions in place for research facilities:
- (i) As part of the review of the Draft National Planning Standards, introduce a new listed zone within Discretionary Direction 8 that adequately provides for research, innovation and education facilities.
 - (ii) Rely on Mandatory Direction 6 for District Councils to introduce a new Special Purpose Zone in their respective District Plan that adequately provides for research, innovation and education facilities within their District; or
 - (iii) Rely on Mandatory Directions 9-12 to introduce a Precinct within an existing zone.
- 2.15 It is considered that either Options (i) or (ii) above would be more appropriate for a Research Campus, and Options (ii) or (iii) would be more appropriate for a Research Farm.
- 2.16 AgResearch’s submission primarily seeks to ensure that the National Planning Standards would adequately provide for AgResearch’s existing and future activities consistent with the approaches taken in existing District Plans.

3 SPECIFIC SUBMISSION POINTS

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

3.2 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.

Signature:

AGRESEARCH LIMITED

by its authorised agents Mitchell Daysh Limited

A handwritten signature in black ink, appearing to read 'G.J. Mathieson', written in a cursive style.

G.J. Mathieson

Date:

17 August 2018

ATTACHMENT A: AGRESEARCH LIMITED'S SUBMISSIONS ON THE DRAFT NATIONAL PLANNING STANDARDS

REF	PROVISION	PAGE	SUPPORT OPPOSE	AGRESEARCH'S COMMENTS	RELIEF SOUGHT
1	S-ASM: Draft Area Specific Matters Standard Zone chapters (S-ZONES) Mandatory directions 6 & 7	43	Support	<p>In the Zone chapters (S-ZONES), Mandatory Directions 6 and 7 state:</p> <p>6. <i>A local authority may include additional special purpose zones in accordance with Direction 7 below but must not include any other additional zones.</i></p> <p>7. <i>An additional special purpose zone must only be created when the proposed land use activities and anticipated development within the defined area:</i></p> <p><i>a. are significant to the district or region</i></p> <p><i>b. could not be enabled by any other zone</i></p> <p><i>c. could not be enabled by the introduction of an overlay, precinct, designation, development area, or specific control</i></p> <p>AgResearch's activities would not be adequately provided for within the Purpose Statement for any of the listed zones within Discretionary Direction 8. Because of their significance to the relevant district and regions (and nationally), it is considered that AgResearch's Research Campuses and Farms would qualify for a Special Purpose Zone under Mandatory Direction 7. Accordingly, AgResearch supports the retention of this approach as a viable zoning option for it's research facilities (including in the event that the MfE decides to not introduce a new 'Research or Innovation Zone' (or similar) for research, innovation and education related activities undertaken at or nearby its core Research Campuses (as sought by AgResearch under submission point 2 below)).</p>	Retain Mandatory Directions 6 and 7.

REF	PROVISION	PAGE	SUPPORT OPPOSE	AGRESEARCH'S COMMENTS	RELIEF SOUGHT
2	S-ASM: Draft Area Specific Matters Standard Zone chapters (S-ZONES) Discretionary Direction 8	43-44	Support in part	AgResearch's activities would not be adequately provided for within the Purpose Statement of any of the zones listed in Discretionary Direction 8. AgResearch seeks that consideration be given to introducing a new listed zone that adequately provides for research, innovation and education related activities undertaken at or nearby its core Research Campuses (consistent with the existing approach taken in relation to AgResearch's Invermay, Grasslands, Lincoln and Invermay Research Campuses).	Add a new listed "Research and Innovation Zone" (or similar) within Discretionary Direction 8 with the following (or similar) "Purpose Statement": <i>The purpose of the Research and Innovation Zone is to provide primarily for the ongoing operation of locally or regionally important research, innovation and education facilities and associated activities.</i>
3	S-ASM: Draft Area Specific Matters Standard Zone chapters (S-ZONES) Discretionary Direction 8 Rural Zone and Rural Production Zone	43-44	Support in part	Discretionary Direction 8 states that the local authority must choose at least one of the zones listed in a following table to use in their Plans, and that each zone contains a Purpose Statement which the zone provisions must fulfil. However, it is noted that the relevant table includes both a "Rural Zone" and a "Rural Production Zone". The "Purpose Statement" for the Rural Zone is as follows: <i>The purpose of the Rural Zone is to provide primarily for primary production activities. The zone may also provide for a limited range of activities which support rural production.</i> The "Purpose Statement" for the Rural Production Zone is as follows: <i>The purpose of the Rural Production Zone is to prioritise primary production activities that rely on the productive nature of the soils, intensive primary production, and also providing for associated rural industry.</i> It is not clear why there needs to be both a Rural Zone and a Rural Production Zone. The Purpose Statement for each zone provides for primary production activities, however the Rural Zone also provides for "a limited range of activities which support rural production" while the	Within the table in Discretionary Direction 8 delete the Rural Production Zone and retain the Rural Zone with the following amendments to the "Purpose Statement": <i>The purpose of the Rural Zone is to provide primarily for primary production activities and intensive primary production, and also to provide for associated rural industry and. The zone may also provide for a limited range of activities which support rural production or have a functional need to locate in the rural area.</i> Alternatively , if it can be demonstrated that there are legitimate resource management reasons for retaining both the Rural Production Zone and Rural Zone, make the following amendments to the respective "Purpose Statements". Rural Production Zone <i>The purpose of the Rural Production Zone is to prioritise primary production activities that rely on the productive nature of the soils, intensive primary production, and also providing for associated rural</i>

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				<p>Rural Production Zone also provides for “intensive primary production” and “associated rural industry”. It is not clear why it is considered appropriate to provide for “intensive primary production” and “associated rural industry” within the Rural Production Zone and not within the Rural Zone. Similarly, it is not clear why it is considered appropriate to provide for “a limited range of activities which support rural production” in the Rural Zone but not the Rural Production Zone.</p> <p>Intensive primary production, rural industry and other activities which support rural production could have a functional need to locate throughout the rural area. For example, AgResearch’s Research Farms are primarily focused on agricultural research activities so may not fit neatly within the ambit of the definition of “primary production” which is:</p> <ul style="list-style-type: none"> a) means any agricultural, pastoral, horticultural, forestry or aquaculture activities for the purpose of commercial gain or exchange; and b) includes any land and auxiliary buildings used for the production of the products that result from the listed activities; but c) does not include processing of those products. <p>Accordingly, AgResearch seeks greater certainty that it’s Research Farms are adequately contemplated and provided for within the Purpose Statement of any Rural Production Zone or Rural Zone. Further, it is considered that there should not be a separate Rural Production Zone and Rural Zone, but instead a single overarching Rural Zone which provides for a full range of typical and appropriate rural activities (via the Purpose Statement). This would avoid potential confusion and a situation where a Council selects either one of the two zones</p>	<p><u>industry and activities which support rural production or have a functional need to locate in the rural area.</u></p> <p>Rural Zone <i>The purpose of the Rural Zone is to provide primarily for primary production activities.. The zone may also provide for a limited range of activities which support rural production or have a functional need to locate in the rural area.</i></p>

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				<p>(which would then potentially exclude the subsidiary activities specified in the other Rural Zone), or both of the zones (where the location of the specified activities would be potentially restricted to one or the other of the zones for no apparent reason).</p> <p>Further, it is considered that the Purpose Statement should include activities which have a “<i>functional need</i>” to locate in rural areas. This would provide greater certainty to AgResearch in terms of ensuring there is provision for Research Farms (which could then be established by way of a Precinct under Mandatory Directions 9-12). It is also noted that while the term “<i>functional need</i>” is defined within the Definitions Standard, it is not used anywhere in the Draft National Planning Standards (despite being a commonly used term in the policy frameworks of Regional Policy Statements, and Regional and District Plans in terms of providing direction on the sort of activities that can establish in rural areas).</p>	
4	S-ASM: Draft Area Specific Matters Standard Precincts chapters (S-PREC) Mandatory directions 9-12	45	Support	AgResearch’s activities would not be adequately provided for within the Purpose Statement for any of the listed zones within Discretionary Direction 8. The majority of AgResearch’s Research Farms are provided for by way of “scheduled site” provisions within a Rural Zone (similar to the Precinct approach referred to in Mandatory Directions 9-12). Accordingly, AgResearch supports the retention of the Precinct approach as a viable zoning option for its research facilities (particularly in relation to its Research Farms).	Retain Mandatory Directions 9-12.
5	F-2: Draft Mapping Standard D. Provisions	54-55	Support in part	Under submission point 2 above, AgResearch is seeking that MfE consider introducing a new listed “Research and Innovation Zone” (or similar) that adequately provides for research, innovation and education related activities	If MfE accepts the relief sought in AgResearch’s submission point 2, add a new “Research and Innovation Zone (or similar) to Table 21: Zone colour palette table.

REF	PROVISION	PAGE	SUPPORT OPPOSE	AGRESEARCH'S COMMENTS	RELIEF SOUGHT
	Mandatory Directions Table 21: Zone colour palette table			undertaken at (and nearby) its core Research Campuses. If MfE accepts the relief sought in this submission point, the new zone would need to be added to Table 21: Zone colour palette table as a consequential change.	
6	CM-1: Draft Definitions Standard Table 29: Definitions Table Definition of "functional need"	82	Support in part	<p>In the Draft Definitions Standard, the definition for "functional need" is:</p> <p><i>"means the need for a proposal or activity to traverse, locate or operate in a particular environment because the activity can only occur in that environment"</i></p> <p>The definition is potentially overly restrictive because it may still be <u>possible</u> for a proposal or activity to traverse, locate or operate within other environments, however there is typically an environment (or environments) that are best suited. For example, there is a functional need for an agricultural research farm to locate in a rural area. While a Research Farm may include a Research Campus area with research related facilities (e.g. offices, laboratories etc) that could be located in an urban area, it is logical and cost effective that it be located on the same property as the research farm.</p>	<p>Amend the definition for "functional need" as follows:</p> <p><i>"means the need for a proposal or activity to traverse, locate or operate in a particular environment because the activity <u>has specific requirements to locate can only occur in that environment</u>"</i></p>