BEFORE THE HEARING PANEL

UNDER THE	Resource Management Act 1991
IN THE MATTER OF	Submissions on the Exemptions Version of the Proposed Waitaki District Plan
BETWEEN	**WAITAKI DISTRICT COUNCIL** Local authority
AND	**FEDERATED FARMERS OF NEW ZEALAND INC** Submitter number 246 Further submitter number FS246

EXEMPTIONS VERSION OF THE PROPOSED WAITAKI DISTRICT PLAN

PLANNING EVIDENCE OF KATE SANNAZZARO ON BEHALF OF NORTH OTAGO FEDERATED FARMERS OF NEW ZEALAND (INCORPORATED) – HEARING STREAM 4

3 NOVEMBER 2026

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INTRODUCTION

1. My name is Karen (Kate) Lisa Sannazzaro. I am currently employed by Federated Farmers of New Zealand (Incorporated) as a Principal Planner. I am authorised to speak on behalf of Federated Farmers, including North Otago Federated Farmers of New Zealand (Incorporated) (**Federated Farmers**).

2. My qualifications and experience are detailed in my evidence for Hearing Stream 1.

3. I have read and agree to comply with the Expert Witness Code of Conduct set out in section 9 the Environment Court's Practice Note 2023.

4. I have read and reviewed the following documents:

   (a) Hearing Minutes 1 through 10.

   (b) The Exemptions Version of the Proposed Waitaki District Plan dated 15 January 2026 (**PDP**).

   (c) The evaluation report prepared under section 32 of the Resource Management Act 1991 (**RMA**) for Industrial Zones (undated).

   (d) The report prepared under section 42A of the RMA, by Ms Katrina Clark for the Industrial Zone (dated 19 October 2026).

   (e) Federated Farmers submission dated 16 May 2025.

   (f) Industry and rural provisions of the Canterbury Regional Policy Statement 2013 and the Otago Regional Policy Statement 2021.

FEDERATED FARMERS SUBMISSION

5. Federated Farmers requested amendment of the definition of "*potentially high-impact industrial activities"* to exclude smaller scale operations for meat and fish processing, such as rural butchers that process recreational catches or farmkill, or offer custom-processing, or provide retail service to the local community.

6. My evidence addresses the drafting and application of the definition of potentially high-impact industrial activities and responds to the analysis and recommendations in the officers' report prepared by Ms Clark.

EXPERT PLANNING EVIDENCE

7. The definition of potentially high-impact industrial activities is as follows:

> *"means industrial activities that because of their nature or scale has a greater potential to impact on the receiving environment than other industrial activities and are those listed below:*
> *…*
> *2. meat processing, or any associated processing of meat and meat by-products, or co-products;*
> *3. fish curing, cleaning, treatment, preserving and storage;*
> *…"*

8. While the introductory wording recognises that an activity may have greater potential to impact on the receiving environment because of its nature or scale, the subsequent list identifies 15 categories of activities by reference to their nature, without any further qualification based on scale.

9. In my opinion, this creates uncertainty as to whether an activity is captured simply because it falls within a listed category, irrespective of scale, or whether its scale is also relevant to its classification.

10. Several submitters raised similar concerns about the breadth and application of the definition, including Federated Farmers. In her response,[1] Ms Clark addresses examples raised by other submitters, being home kill, hunting, and disposal of dead animals. She considers that:

    (a) these activities are generally more appropriately characterised as primary production, rural or domestic activities, rather than industrial activities;

    (b) the listed activities are directed at commercial or industrial-scale operations; and

    (c) the definition now only applies to exempted zones and would not apply to activities in the withdrawn GRUZ.

11. I generally agree with Ms Clark's assessment in relation to processing hunting and home kill and to the disposal of dead animals, where no trade is involved. However, I do not consider that her response adequately addresses the concern raised by Federated Farmers: that small-scale trade enterprises, such as butcheries and fish-processors, may also be captured by the definition.

[1] At paragraphs 67-73 of the s42A Report for Industrial Zones.

12. This concern needs to be considered alongside the definition of *industrial activity*:

> *means an activity that manufactures, fabricates, processes, packages, distributes, repairs, stores, or disposes of materials (including raw, processed, or partly processed materials) or goods. It includes any ancillary activity to the industrial activity.*

13. In my opinion, small-scale trade enterprises such as butcheries and fish-processors are capable of meeting this definition through the processing, preparation, packaging and storage of meat or fish products. They may therefore fall within the listed categories of potentially high-impact industrial activities, irrespective of their relatively small scale.

14. Scale is relevant to the potential environmental effects of an activity. A small butchery processing modest quantities of meat is likely to have materially different effects from a large commercial meat-processing facility. The same distinction may apply to small-scale fish-processing operations and large industrial operations.

15. Whether an industrial activity is potentially high-impact has material implications across several zones:

    (a) In the Settlement Zone, small-scale industrial activities are permitted subject to standards, whereas potentially high-impact industrial activities are discretionary.

    (b) In the Town Centre Zone, certain industrial activities, including food processing and manufacturing, are permitted subject to standards, whereas potentially high-impact industrial activities are non-complying.

    (c) In the Mixed-Use Zone, compliant industrial activities are restricted discretionary, whereas potentially high-impact industrial activities are non-complying.

    (d) In the Light Industrial Zone and the General Industrial Zone, industrial activities are permitted subject to standards, whereas potentially high-impact industrial activities are non-complying.

16. Capturing all small-scale enterprises within the definition could unnecessarily restrict their ability to establish or operate, including in zones where other small-scale industrial activities are anticipated and provided for.

17. I recommend amending the definition to more clearly recognise how the scale of an activity is relevant when determining whether it has the potential to give rise to

greater adverse effects. I consider that improving clarity regarding scale appears to align with Ms Clark's position that the activities in the definition are "directed at industrial-scale operations."[2]

18. A relatively straightforward refinement is to clarify which listed activities are only captured where their scale, having regard to their nature, gives rise to that greater potential. This would provide a more proportionate basis for applying the definition than the current approach, which could capture activities irrespective of scale.

19. I acknowledge that this approach would retain some subjectivity, with the potential effects and classification of an activity still requiring consideration on a case-by-case basis. Greater certainty could potentially be achieved through more specific qualifications, thresholds or exclusions. However, these would need to be informed by an appropriate evidential basis, which may not be readily available. In the absence of such evidence, I consider that an overarching qualification recognising the relevance of scale would be a worthwhile improvement.

20. I have also considered the Section 32 Industrial Zones Evaluation Report. While it evaluates the proposed industrial zone framework at a broad level, I have not identified specific consideration of the implications of the definition for smaller-scale enterprises. I consider this is an aspect that warrants further consideration by the reporting officer.

[2] At paragraph 70 of the s42A Report for Industrial Zones.