

**BEFORE THE HEARINGS PANEL APPOINTED BY WAIMAKARIRI DISTRICT  
COUNCIL**

**IN THE MATTER** of the Resource Management Act 1991  
**(the Act)**

AND

**IN THE MATTER** of hearing of submissions on The Proposed  
Waimakariri District Plan

Hearing Stream 6: Rural

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**INDUSTRY STATEMENT OF SARAH CAMERON FOR HORTICULTURE NEW  
ZEALAND**

**25 September 2023**

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## PURPOSE AND SCOPE OF EVIDENCE

1. This statement responds to the Section 42A report recommendations in regard to the Horticulture NZ submission and further submissions to be considered at hearing 6 rural, specifically horticultural activities, reverse sensitivity, the interface with sensitive activities in the General Rural and Rural Lifestyle Zone, workers accommodation and the benefits horticulture can bring as a low emissions land use such that planning should enable changes in land use and adaptation.

## INTRODUCTION

2. HortNZ is the industry body for the horticulture sector, representing growers who pay levies on fruit and vegetables sold either directly or through a post-harvest operator, as set out in the Commodity Levies (Vegetables and Fruit) Order 2013.
3. On behalf of growers, HortNZ takes a detailed involvement in resource management planning processes as part of its national and regional environmental policy response.
4. My name is Sarah Cameron. I am a Senior Environmental Policy Advisor at Horticulture New Zealand (HortNZ). I am involved in HortNZ's national, regional, and district planning processes across New Zealand. I have been in this role since 2 May 2022.

## RESPONSE TO SECTION 42A REPORT

5. **Appendix 1** includes a summary table setting out HortNZ's submissions, the recommendations of the s42A report on these submissions and HortNZ response.

## GENERAL COMMENTS

6. Council is proposing to rezone a significant area of its rural environment to Rural Lifestyle Zone (RLZ) which is predominantly highly productive land (HPL) and comprises a large part of the existing horticultural food production activity in the district. There are over 100 hectares of horticulture grown on HPL in the proposed RLZ.
7. The area of horticultural food production has fluctuated over time and the industry takes a long-term view of food production needs such that we do not support a planning framework that might curtail primary production opportunities for the future that assist with responding to climate change and the production of food for domestic supply and export.
8. HortNZ opposes the proposed rezoning but realises the difficulty in overturning this decision of council. Therefore our attention turns to seeking

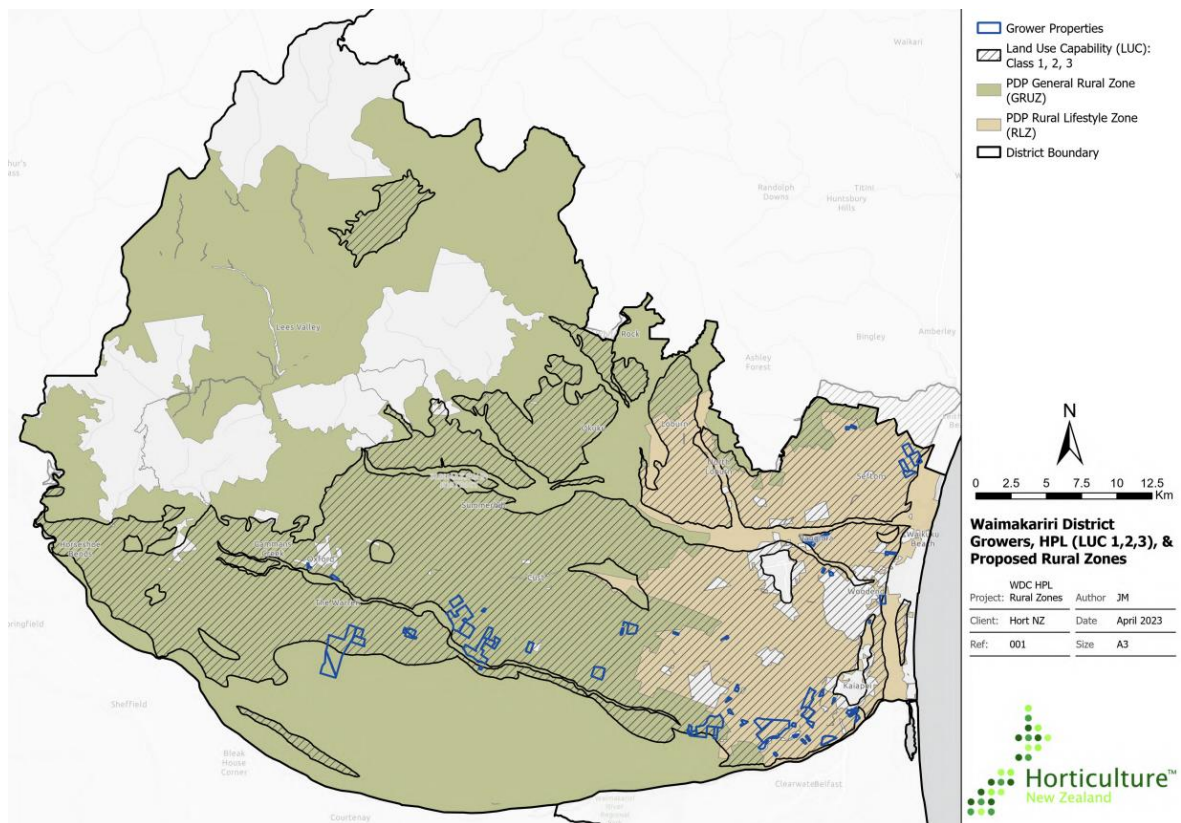
the appropriate objectives, policies and rules to support existing lawfully established horticultural operations in the proposed RLZ and enabling new activities.

9. This view is supported by the National Planning Standard description of the RLZ:

*Areas used predominantly for a residential lifestyle within a rural environment on lots smaller than those of the General rural and Rural production zones, while still enabling primary production to occur<sup>1</sup>.*

10. Supporting a planning framework that enables the supply of fresh fruit and vegetables has been directed in the National Built and Environment Act (NBEA).
11. Section 58 (g) directs that the national planning framework must provide direction on certain matters, including enabling the supply of fresh fruit and vegetables.
12. This is an explicit recognition of the importance of food security for New Zealanders. This recognition will ensure that the growing of fruit and vegetables is a key focus in planning decisions across New Zealand for the future.

Picture one: HPL, proposed zones and horticulture locations in the Waimakariri district

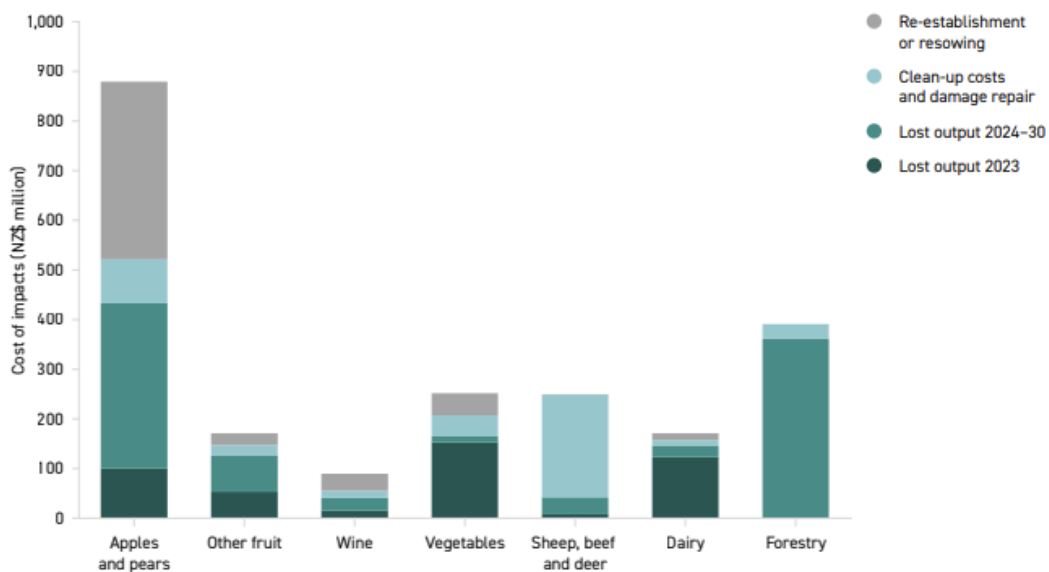


<sup>1</sup> <https://environment.govt.nz/assets/publications/national-planning-standards-november-2019-updated-2022.pdf>

## HORTICULTURE GROWTH

13. New Zealand is already seeing the impacts of climate change with severe weather events including droughts, cyclones and hail affecting food production.
14. In February 2023, Cyclone Gabrielle struck New Zealand causing loss of life and catastrophic damage to parts of New Zealand with Hawkes Bay and Gisborne being the worst hit regions.
15. The financial impacts to the horticulture industry were significant and some growers have been displaced. For instance, 70% of outdoor tomatoes were destroyed by Cyclone Gabrielle.

Graph one: Estimated impacts from Cyclone Gabrielle



16. Extreme weather events are predicted to become more widespread which will continue to interrupt and displace fresh fruit and vegetable growing which is essential for New Zealand domestic food supply.
17. As temperatures change and more intense weather patterns occur, plant hardiness zones may shift, impacting the suitability of certain crops for specific regions. Growers may need to select different crop varieties or species that are better adapted to new climate conditions or adopt new ways of growing for example covered cropping.
18. As the climate warms, areas in New Zealand where there is sufficient winter chill will become less accessible.
19. Appropriate winter chill is classified as 500 winter chill hours of 7°C or below between May and September<sup>2</sup>. Winter chilling is important for flowering

<sup>2</sup> Taranaki Land and Climate Assessment, Plant and Food

crops as they need to be dormant for a sufficient period over winter to induce flowering in spring.

20. Many fruit trees require a period of winter chill to break dormancy and produce fruit in the spring and summer. Winter chill helps fruit trees undergo the physiological changes needed for bud development and flowering. Here are some common fruit trees that require winter chill that could be considered to be grown in the Waimakariri district:

Apples	Currently grown in the district. Apple trees typically require a significant amount of winter chill, depending on the variety.
Peach	Peach trees have varying chilling requirements based on the specific cultivar
Pear	Pear trees generally need a moderate amount of winter chill
Cherry	Currently grown in the district. Sweet cherry trees ( <i>Prunus avium</i> ) and sour cherry trees ( <i>Prunus cerasus</i> ) have varying chilling requirements, with some varieties suited for low-chill climates.
Plum	Currently grown in the district. Plum trees typically have moderate chilling requirements
Nectarines	Currently grown in the district.

21. Many vegetables require a period of winter chill and over time as the climate changes, we could see the expansion of these crops into the Waimakariri district:

Broccoli	Currently grown in the district. Broccoli requires a period of cold temperatures to promote the development of broccoli heads
Cabbage	Adequate cold exposure promotes head formation in cabbage plants
Cauliflower	Similar to broccoli, cauliflower requires winter chill to trigger flowering and the development of the edible curd
Kale	Kale can withstand frost and actually becomes sweeter after exposure to cold temperatures
Carrots	Carrots are perfect cold weather veggies. Not only do they thrive in cold temperatures, but they actually taste sweeter
Parsnips	Similar to carrots. Parsnips and carrots can also be overwintered in a garden bed that is covered with sufficient mulch in late autumn
Leeks	Currently grown in the district. Leeks are known for their ability to withstand cold temperatures and can continue growing during the winter months
Garlic	Garlic cloves planted in autumn require a period of winter chill to develop properly. Adequate cold exposure is essential for bulb formation

Onion	Currently grown in the district. Onions planted as sets or seeds in autumn also benefit from winter chill.
Spinach	Spinach is a cool-season leafy green that can tolerate frost and benefits from winter chill. Cold temperatures can enhance the flavour and texture of spinach leaves.

22. The rural chapter plan changes need to provide for growth in a changing climate and provide flexibility in the planning framework to support primary production.
23. I note the s42A report writers opinion that water availability is a constraint to horticulture such that growth in the district is not expected. I see that as shortsighted in light of the significant research and development that is being put into the consideration of alternatives nationally including water supply, water storage and advancing crop varieties that require less water but continue to achieve food production outputs.

#### **COVERED CROPPING**

24. HortNZ's submission set out the importance of recognising covered cropping in the district. Covered cropping refers to glasshouse and/or greenhouse.
25. With changing practice, crop types and diversification in the horticultural sector, growers have become increasingly reliant on a variety of covered cropping methods.
26. Growing within a greenhouse produces a more consistent yield and consistent quality of product for longer periods of the year in comparison to outdoor growing.
27. Cover cropping is also likely to be increasingly relied on as an adaptation to climate change and maintain food production outputs to meet domestic need and exports.
28. Mr Lindsay's evidence sets out how covered cropping can be profitable on smaller sites.

#### **REVERSE SENSITIVITY AND SENSITIVE ACTIVITIES**

29. The GRUZ and RLZ are characterised by the presence of primary production activities and the associated sights, sounds and smells which accompany these activities.
30. Horticultural operations rely on the use of machinery, structures to support and protect crops, agrichemical and fertiliser application, heavy vehicles to transport produce, and many other activities that may generate a range of effects. Not all effects can be internalised but best practice is done to do so. These effects are characteristic and part of the landscape and amenity of rural environments.

31. Reverse sensitivity" effects growers when occupants of a new activity or use complain about the effects of an existing, lawfully established horticultural activity or use. This can place significant economic burden and operational limitations on the grower reducing their economic viability and social licence to operate.
32. The supply and use of land suitable for quality horticultural production is under pressure from urban development and lifestyle subdivision and use across New Zealand. Land fragmentation and reverse sensitivity issues are inhibiting horticultural operations.
33. The National Policy Statement for Highly Productive Land 2022 (NPSHPL) protects HPL for inappropriate subdivision and urban development thereby limiting reverse sensitivity effects. It is unfortunate that the NPSHPL doesn't have affect in the RLZ situation of the proposed Waimakariri District Plan due to notification of the proposed zone change prior to notification of the NPSHPL.
34. HortNZ is concerned that lawfully established horticultural activities will face reverse sensitivity issues and new activities potentially constrained because of the permitted activity status of the following activities that may be sensitive to the effects of primary production:
  - Conservation activities
  - Recreation activities
  - Rural tourism
35. The activity status and setbacks insufficient to provide an appropriate level of control or assessment for these activities. HortNZ supports the evidence of Mr Hodgson in this regard.

#### **ACTIVITIES THAT SUPPORT HORTICULTURE**

36. HortNZ sought a number of activities that support horticulture be provided for in the GRUZ and RLZ:
  - Artificial Crop Protection Structures
  - Crop Support Structures
  - Frost Fans (NOISE chapter)
  - Audible Bird Scaring Devices (NOISE chapter)
  - Seasonal Accommodation
37. Horticulture accepts the S42a author recommendation to not include a specific definition and supporting rule framework for Artificial Crop Protection Structures and Crop Support Structures. As the S42a author points out, the HortNZ suggestion that has been adopted from other plans does not in this plan provide any greater degree of efficiency. The point HortNZ wishes to make is that these structures are typical of horticultural production and future land use could see their adoption to aid food production. They should not be considered as buildings subject to coverage or impervious surface limitations.

38. One activity that HortNZ seeks a definition and supporting planning framework for is seasonal worker accommodation.
39. Seasonal worker accommodation provides for temporary and often communal living arrangements; it is quite distinct from permanent worker accommodation which might support a full-time employee and their family. Both are used in the horticultural sector.
40. It is a definable activity that requires a specific resource management response to reflect the nature of the activity. Accommodating workers in appropriate accommodation near their places of employment is more efficient for the horticulture industry than accommodation that will need to be found further afield and workers will be required to commute. This also alleviates pressure on the private rental market.
41. To assist in housing seasonal workers, the New Zealand Government's Recognised Seasonal Employer (RSE) scheme has been in place since 2007.
42. Government-run, the scheme allows employers within the horticulture and viticulture industries to recruit a capped number of workers from overseas – predominantly from the Pacific – for seasonal work in New Zealand.
43. The RSE scheme is a mutually beneficial partnership supporting the economies and communities of both Pacific nations and New Zealand. Pacific workers receive training, mentoring and develop skills they can take home to begin their own business ventures, while earning an income that is sent back to their families and the wider community.
44. At the same time, the RSE scheme supports New Zealand growing businesses during peak harvest times and enables the horticulture and viticulture industries to employ New Zealanders in skilled, full-time positions.
45. The scheme has been recognised by the World Bank as one of the best migrant labour schemes in the world.
46. Employers must meet a stringent set of government criteria to be granted RSE status (accreditation).
47. RSE status is only granted where employers meet the specific standards set out by Immigration New Zealand (INZ) such as evidence of their financial position, a demonstration of good employment practices, as well as a commitment to training and employing New Zealanders.
48. Once granted RSE status, employers must apply for an Agreement to Recruit (ATR) to bring Pacific workers into the country for seasonal work.
49. Under this ATR, employers must meet further obligations set out by INZ, including but not limited to: satisfactory pastoral care, fulfilment of health and safety requirements and suitable accommodation and onsite facilities.
50. There have been recognised labour shortages in horticulture over the last few years and the RSE scheme has been instrumental in supplying labour however the scheme needs to be supported by district plan rules.
51. Several district plans have taken the approach of providing for seasonal workers accommodation based on a concept of shared kitchen and



ablution facilities and separate sleeping quarters. This type of facility is cost efficient and adequately provides for seasonal accommodation.

52. The performance standards for minor residential units are not appropriate for permanent or seasonal worker accommodation. Primarily 90m<sup>2</sup> is too small to support a typical arrangement that might attract and support a worker and associated family in a more permanent activity or seasonal workers.
53. HortNZ has sought a definition and provisions for seasonal worker accommodation which have been rejected based on:
  - The small scale of land parcels (4ha)
  - Minimum land size requirements as identified in the Macfarlane report<sup>3</sup> (10-15ha for horticulture and 15-20ha for vegetable crops).
54. The minimum land size requirements mentioned in the MacFarlane report and referenced in the S42a report as a part reason to decline a planning framework for seasonal accommodation, were assumed after speaking to two growers (a potato grower and a seed marketer and grower) in 2018.

Table one: Minimum are by land use to be profitable (MacFarlane report)

Production System	Minimum Productive Area (Hectares)
Speciality Small Seeds (e.g. Carrot)	10 - 15
Horticulture (e.g. Apples)	10 - 15
Vegetables (e.g. Potatoes)	15 - 20
Dairy Support and Dairy	20 - 40
Mixed Cropping/Livestock	20 - 40
Intensive Breeding Finishing	40
Extensive Breeding and Finishing	100

55. HortNZ provided feedback on this report:
 

*The Waimakariri District is becoming a more desirable location for horticulture. Of particular appeal to vegetable growers are the large land parcels (20 – 50ha) that remain in the Waimakariri District. However, some crops, and in particular covered crops, are economically viable when grown on smaller land parcels (2ha – 10ha).*
56. The S42a author and the MacFarlane report failed to consider the productive nature of covered cropping. Covered cropping refers to glasshouse and/or greenhouse.
57. With changing practice, crop types and diversification in the horticultural sector, growers have become increasingly reliant on a variety of covered cropping methods.

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<sup>3</sup> [https://www.waimakariri.govt.nz/\\_data/assets/pdf\\_file/0020/136145/26.-Waimakariri-District-Plan-Review-v2.pdf](https://www.waimakariri.govt.nz/_data/assets/pdf_file/0020/136145/26.-Waimakariri-District-Plan-Review-v2.pdf)

58. Growing within a greenhouse produces a more consistent yield and consistent quality of product for longer periods of the year in comparison to outdoor growing.
59. Smaller sites that don't have covered cropping can also be productive. Particularly those that are not contiguous eg – multiple sites in the same ownership spread out over multiple four hectares blocks. Vegetable rotations are a good example of this.
60. An example of a horticulture crop being productive on smaller sites is the kiwifruit industry. The average size of a green orchard is 3.3 ha while gold is 3.9ha<sup>4</sup>. Gold kiwifruit has the highest return of the horticulture sector.
61. The MacFarlane report was published five years ago. Since that time food security and climatic events have elevated food security issues in our planning decision making. HortNZ does not consider it reasonable to rely on this report and the findings at that point in time to then determine the planning response for the district.

#### **HORTICULTURE AS A LOW EMISSION LAND USE**

62. Diversification to horticulture presents an opportunity to reduce emissions while increasing food production.
63. This has been identified by the Climate Change Commission. *'Ināia tonu nei: a low emissions future for Aotearoa'*<sup>5</sup>.
64. It includes the assumption (in the Demonstration Path) that nationally, 2,000 ha of land will be converted to horticulture per year from 2025 and notes that the Commission expect this could increase if "barriers – such as water availability, labour, supply chains and path to market – are addressed".
65. Opening up more opportunities for conversion to lower emissions production systems and land uses, including horticulture, is listed as a critical outcome.
66. The advice also notes that further land use change from livestock agriculture into horticulture and forestry (from 2021, additional 3,500 ha per year converted from dairy) would be required to meet the more ambitious end of the 2050 methane target if new technology does not come through.
67. To enable horticulture growth to continue and increase, a regulatory/policy environment that enables the market to respond is required.
68. There is a national food producing system that relies on growing vegetables and fruit in pockets of HPL, with good climate and access to freshwater.

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<sup>4</sup> <https://www.zespri.com/content/dam/zespri/nz/publications/annual-reports/Zespri-Annual-Report-2022-2023.pdf>

<sup>5</sup> <https://www.climatecommission.govt.nz/our-work/advice-to-government-topic/in-ia-tonu-nei-a-low-emissions-future-for-aotearoa/>

69. New Zealand's existing food production systems are coming under increased pressure from population growth (and competing land use demands reducing availability of HPL), climate change, water concerns, ETS costs and the cost of energy, and the need to improve environmental outcomes.
70. Horticulture can bring several efficiencies to food production, making it a valuable component of a sustainable and productive food system.

Type	Efficiency
Water	Horticultural practices often allow for precise control of water usage through techniques like drip irrigation, hydroponics, and soil moisture monitoring. This reduces water wastage and helps address water scarcity issues.
Land use	Horticulture typically requires less land compared to traditional agriculture, making it possible to produce high-value crops in smaller areas.
Energy	Greenhouses and other horticultural systems can optimise energy utilisation for heating, cooling, and lighting, resulting in decreased energy consumption per unit of crop produced
Crop yields	Compared to agriculture, horticulture can provide better yields per unit of land since it frequently concentrates on high-value crops. This may result in greater food production with less harm to the environment.
Erosion	Horticulture can assist in reducing soil erosion and enhancing soil health by employing strategies like mulching and cover crops.
Climate resilient	Horticulture research can lead to the development of crop varieties that are more resilient to climate change, helping to ensure food security in changing conditions.
Water and Soil Quality	Horticultural practices that focus on organic farming and reduced chemical use can improve water quality by minimising runoff of pollutants and enhance soil health through the addition of organic matter.

72. Recognising horticulture as a low emissions land use option that can produce high yields on less land can bring several economic benefits to a region:

Type	Benefit
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Increased Productivity	Horticultural practices often result in higher yields per unit of land compared to traditional agriculture. For example, intensive cultivation methods like greenhouse farming or vertical farming can produce crops year-round, optimising land use and maximising productivity. Increased yields can lead to higher incomes for growers which in turn supports local supply chains.
Diversification	Recognising horticulture's potential encourages diversification. Diversification can reduce a district's reliance on a single industry which can be vulnerable to price fluctuations and market volatility. A more diverse horticultural portfolio can enhance economic resilience.
Job creation	Horticulture often requires more labour-intensive practices, especially in smaller-scale or specialty crop production. This can lead to the creation of more jobs which can help reduce unemployment rates and stimulate local economies.
Innovation and Technology	Recognizing horticulture's importance can drive investments in research, innovation, and technology adoption within the sector. This can lead to the development of advanced farming techniques, improved crop varieties, and more efficient resource management, which can enhance productivity and competitiveness.
Rural Development	By promoting horticulture as a sustainable land use option, regions can encourage rural development. This includes investments in rural infrastructure, such as irrigation systems, cold storage facilities, and transportation networks, which not only benefit horticulture but also

	support other sectors of the economy.
Improved Resilience to Climate Change	Horticultural practices can be adapted to changing climate conditions more easily than some other forms of agriculture. Regions that recognize this can build resilience to climate change, reducing the economic risks associated with extreme weather events and shifting growing seasons.

73. Overall, horticulture is essential to the production of sustainable food and low emissions land use because it minimises environmental effects while producing a variety of nutrient-dense foods to support New Zealand domestic food supply and meeting overseas market demands.

## CONCLUSION

59. I support the evidence of Mr Hodgson and Mr Lindsay.
74. It is important the district plan is future-proofed so that it is fit-for-purpose and responsive to change over its lifetime. The review of the rural provisions of the district plan is occurring in a dynamic space of change – including freshwater regulations, climate change mitigation and adaptation and national policy context in terms of matters such as food security, highly productive land, biodiversity and urban development. This highlights the importance of future-proofing the availability of resources to supply the district's growing horticulture population.
75. I support an approach that allows for horticulture growth and activities that support horticulture production.

**Sarah Cameron**

**25 September 2023**



## Appendix 1

Provision	Support/oppose	Reason	Decision sought	S42 Recommendation	HortNZ Decision
<b>Definitions</b>					
Accessory building	Support	Consistent with National Planning Standards	Retain as notified	Accept	Support
Audible bird scaring device	Support	Provides clarity	Retain as notified	Accept	Support
Childcare facility	Support	Provides clarity. Support recognition that it is 'paid care' and a minimum of four unrelated children. Larger childcare facilities within rural areas can create reverse sensitivity impacts on growing operations.	Retain as notified	Accept	Support
Cleanfill area	Support	Consistent with National Planning Standards	Retain as notified	Accept	Support
Cleanfill material	Support	Consistent with National Planning Standards	Retain as notified	Accept	Support
Community facility	Support	Consistent with National Planning Standards	Retain as notified	Accept	Support

Conference facility	Support	Provides clarity. Support acknowledgement of irregular nature of events.	Retain as notified	Accept	Support
Conservation activities	Oppose in Part	<p>The proposed definition limits Conservation activities to parks, reserves, beach areas and open space and recreation zones. Therefore, on farm activities are excluded from the definition. This conflicts with the policy direction to enable conservation activities throughout the Rural Zones (RURZ-P4).</p> <p>Including plant nurseries, research and educational activities in the definition may cause tension when administering the plan as they have different and more permanent effects compared to the other activities listed. This is scale dependant. Also being open to the public (such as with a retail component) will have greater impacts on neighbours. This should be managed.</p> <p>Oppose carbon sequestration until the plan adequately safeguards the life supporting capacity of soils because carbon sequestering forests are to remain in perpetuity, preventing the use of highly productive land for productive purposes. It is also</p>	<p>Amend as follows: means the management, maintenance and enhancement of ecological values of <del>parks and reserves, beach areas and open space and recreation zones.</del></p> <p>This includes:</p> <ul style="list-style-type: none"> <li>a) pest control;</li> <li>b) fencing;</li> <li>c) <del>plant nurseries;</del></li> <li>d) conservation and restoration planting;</li> <li>e) planting for stormwater treatment, erosion and coastal protection; <del>and carbon</del></li> </ul>	Not mentioned in plan	



		<p>questioned if carbon sequestration is a conservation activity.</p> <p>Cause (f) is about activities while the rest of the clauses are largely about structures or temporary activities (e.g. pest control).</p>	<p>sequestration ;</p> <p>f) ancillary environmental research and education activities;</p> <p>g) ancillary access tracks and ancillary structures;</p> <p>h) the ancillary use of vehicles, machinery or equipment.</p>		
Contaminant	Support	Consisted with RMA and National Planning Standards	Retain as notified	Accept	Support
Contaminated Land	Support	Consisted with RMA and National Planning Standards	Retain as notified	Accept	Support
Cultivation	Support	Consistent with National Planning Standards	Retain as notified	Accept	Support
Discharge	Support	Consistent with RMA	Retain as notified	Accept	Support

Earthworks	Support	Consistent with National Planning Standards	Retain as notified	Accept	Support
Environment	Support	Consistent with National Planning Standards	Retain as notified	Accept	Support
Farm quarry	Oppose in part	The reference to 'farming and horticulture' is inconsistent with reference to various other similar terms across the plan - agriculture, plantation forestry, forestry, primary production, and rural production used in the plan. Also noting that Intensive Primary Production (indoor and outdoor) are also a subset of farming and could require a farm quarry provision.	Amend as follows:  means the extraction of minerals taken for use ancillary to farming, <del>forestry and horticulture</del> <u>and other rural activities</u> , and only used within the property of extraction. It <del>includes the extraction of material for farm and forestry tracks, accessways and hardstand areas on the property of origin.</del> It does not include the exportation or removal of extracted material (including any aggregate) from the property of origin <del>or for retail or</del>	Reject	Support

			other sales of such material.		
Farming and agricultural suppliers	Oppose	The definition does not describe farming and agricultural suppliers. It is potentially more akin to Garden and Landscape Supplies.	Delete definition in its entirety or rename to Garden and Landscape supplies or similar.	Accept	Support
Intensive indoor primary production	Support	Consistent with National Planning Standards	Retain as notified	Accept	Support
Intensive outdoor primary production	Support	Does not relate to growing fruits and vegetables	Retain as notified	Accept	Support
Minor residential unit	Support	Consistent with National Planning Standards	Retain as notified	Accept	Support
Noise sensitive activities	Support	The activities listed can be sensitive to noise, causing reverse sensitivity impacts on primary production.	Retain as notified	Accept	Support
Primary Production	Support	Consistent with National Planning Standards	Retain as notified	Accept	Support
Residential unit	Support	Consistent with National Planning Standards	Retain as notified	Accept	Support
Reverse sensitivity	Support	Reverse sensitivity is a considerable issue for primary production activities, especially when they have multiple rural	Retain as notified	Accept	Support

		'lifestyle' neighbours who do not appreciate that the rural environment is a working environment.			
Rural industry	Support	Consistent with National Planning Standards	Retain as notified	Accept	Support
Rural produce retail	Oppose in part	Often crops are grown by a horticultural operation across multiple 'sites' (as per the proposed district plan's definition of "Site"). Growers rotate land to avoid soil borne diseases. The land parcels they grow on may not be adjacent to one another or even in the same ownership as leasing land is coming for vegetable growing. It is more efficient and would have less impact to have a rural produce retail on one site to cater for the entire horticultural operation.	Amend as follows: means the use of land or building on, or within which, rural produce <del>grown or produced on the site</del> and products manufactured from <del>it</del> <u>the rural produce</u> are offered for sale.	Accept	Support
Rural production	Support	The definition proposed is a subset of Primary Production, removing activities that can have more intensive effects on the surrounding environment. This is the approach that has been taken in other District Plans.	Retain as notified	Accept	Support
Rural zones	Support	Provides clarity both the RLZ and GRUZ are rural zones.	Retain as notified		
Sensitivity activities	Oppose in part	The definition is too open and will result in confusion.	Amend as follows: means activities and facilities including;	Reject	Do not support recommendation

			<p>but is not limited to, educational facilities, community facility, healthcare facility, childcare facilities, residential units, minor residential units, retirement village, visitor accommodation, community facility, offices and hospitals.</p> <p>Alternatively, include the full list of sensitive activities within the definition.</p>		
New definition - Artificial crop protection structures	New Definition	A definition should be included for artificial crop protection structures	<p>Insert new definition as follows:</p> <p><u>Artificial crop protection structure means structures to protect crops and/or enhance growth (excluding greenhouses).</u></p>	Reject	Support
New definition - Crop support structures	New Definition	A definition should be included for crop support structures	<p>Insert new definition as follows:</p>	Reject	Support

			<p><u>Crop Support Structure</u>: means an <u>open structure on which plants are grown.</u></p>		
New definition - Horticultural Greenhouse	New Definition	A definition should be included for Horticultural greenhouses as it is referenced in plan provisions.	<p>Insert new definition as follows:</p> <p><b><u>Horticultural Greenhouse</u></b> means <u>a structure enclosed by glass or other transparent material and used for the cultivation or protection of plants in a controlled environment.</u></p>	Reject	Support
New definition - Seasonal worker accommodation	New Definition	For the reasons explained above HortNZ seeks that the plan specifically provides for Seasonal Worker Accommodation.	<p>Insert new definition as follows:</p> <p><b><u>Seasonal worker accommodation</u></b> means <u>the use of land and buildings for the sole purpose of accommodating the short-term labour requirement of a farming activity.</u></p>	Reject	Do not support recommendation

			<u>rural industry or post-harvest facility.</u>		
<b>GRUZ - General Rural Zone</b>					
RURZ - Introduction	Oppose in part	<p>The majority of horticultural operations in the Waimakariri District are within the RLZ. The introduction specifically lists farming types for the GRUZ, but not the RLZ. This should be acknowledged in the paragraph on RLZ.</p> <p>The introduction also does not acknowledge Highly Productive Land or the significant resource of the LUC 1,2 and 3 soils in the district that are important for primary production.</p>	<p>Amend the 4<sup>th</sup> paragraph of the RURZ Introduction as follow:</p> <p>...</p> <p>The Rural Lifestyle Zone, recognises that this area comprises the densest rural settlement pattern in the District. This rural area is defined by its fine grained pattern of settlement and human induced characteristics. The zone provisions retain the focus of the zone by providing for primary production activities and other rural activities, while recognising that the predominant character is derived</p>	Part accepted	Do not support recommendation

from smaller sites. While the sites are smaller than the GRUZ, they are still productive and the majority of the District's horticultural operations are within the RLZ.

....

Primary production, particularly vegetable growing, depend on the availability of highly productive land to produce food. Land Use Class 1, 2 and 3 soils are significant resource within the District. However, the availability of this land is gradually and irreversibly being reduced as a result of urban expansion and fragmentation by rural lifestyle developments. These developments are also causing reverse sensitivity



			<p><u>effects and result in existing primary production being vulnerable to complaints. It is important to recognise the value and benefits associated with the use of Highly Productive Land, and to maintain the availability of Highly Productive Land for primary production for future generations. Highly Productive Land must be protected from inappropriate subdivision, use and development.</u></p>		
RURZ-O1 – Rural Environment	Support	It is appropriate to have an objective that stated primary production is the predominant land use in rural zones.	Retain as notified	Accept	Support
RURZ O2 – Activities in Rural Zones	Oppose in part	The activities listed should be enabled in the rural zone, not just supported, as this is the only location in the district that they can occur.	Amend RURZ O2 as follows: Rural Zones <del>support</del> enable primary production	Reject	Support

		<p>Particularly agree with the confined list of activities that are included in this objective, being:</p> <ul style="list-style-type: none"> <li>• primary production activities,</li> <li>• activities that directly support primary production, and</li> <li>• activities with a functional need.</li> </ul>	<p>activities, activities which directly support primary production, and activities with a functional need to be located within Rural Zones.</p>		
RURZ - P1	Oppose in part	<p>This policy does not support O1 or O2. It should focus on ensuring recognition of the potential effects and not their scale or whether they are temporary or not</p>	<p>Amend RURZ - P1 as follows:</p> <p>Recognise the contribution of amenity values to maintaining the character of the zones, and maintain amenity values in Rural Zones by:</p> <p>...</p> <p>2. <u>recognising that the rural environment is a working environment with retaining generally low levels of signs, noise, traffic, odour, dust, outdoor lighting, large buildings and structures and other built form while</u></p>	Reject	Do not support recommendation

			<p>recognising that in association associated with primary production and rural industry, <u>and that these features form which are</u> part of the character of each rural zone <u>and</u> that:</p> <p>a) there may be seasonal, short term or intermittent odour, noise, dust, traffic and outdoor lighting effects; and</p> <p>b) large buildings may have a functional need.</p> <p>...</p>		
RURZ - P2	Support in part	<p>Support the intent of the policy, however, primary production should be enabled, not just provided for.</p> <p>Also, there is not a proposed definition of highly productive land. In addition, the lack of recognition of the importance of the versatile soils has also been discussed above.</p>	<p>Amend RURZ - P2 as follows:</p> <p>Maintain the availability and life supporting capacity of land in recognition of its importance for undertaking primary production, and to maintain or enhance</p>	Accept	Support

			<p>natural environment values in Rural Zones, including by:</p> <ol style="list-style-type: none"> <li>1. <del>providing</del> <u>enabling</u> for primary production activities;</li> <li>2. <del>providing for</del> <u>enabling</u> those activities that directly support primary production, or those activities with a functional need to be located within Rural Zones, where: ...</li> </ol>		
RURZ - P3	Oppose in part	This policy as proposed is inconsistent with SD-04, RURZ O1 and RURZ O2. Local support activities are not defined by the proposed plan and the policy describes them very widely as <i>activities that directly support, the health, safety</i>	Amend RURZ - P3 as follows: Local support activities	Reject	Do not support recommendation

*and well-being of people living within the rural community.*

This policy could therefore support a wide range of activities that are not primary production, do not support primary production or do not have a functional need to locate in the rural environment. These activities should be located on land that is appropriately zoned or designated, and as a last resort locate in Rural Zones. Therefore, the policy should be strengthened to be clear that locating such activities in the rural zones should only occur in limited circumstances where the need and benefits to the rural community are demonstrated.

Activities that directly support the health, safety and well-being of people living within the rural community are provided for in limited circumstances where they:

1. will not limit or constrain the operation of primary production activities or result in adverse effects on sensitive activities;
2. have a design, scale, intensity, and built form consistent with the character and amenity values of the zone;

3. can manage actual or potential adverse effects including visual, traffic, dust, noise, odour, or lighting consistent with the amenity values of the zone; and
4. to the extent practicable, internalises any adverse effects of the activity within the site; and
5. There is a demonstrated need to locate in the rural environment and a demonstrated benefit to the rural community.

RURZ - P4	Oppose in part	<p>HortNZ supports the enablement of conservation activities but notes that the definition of conservation activities is very wide and includes retail. HortNZ is of the view that while conservation activities such as riparian planting and wetland enhancement should be enabled, other activities that fall under the definition should be managed.</p>	<p>Either constrain the definition of Conservation Activities or amend RURZ - P4 as follows:</p> <p><del>Enable</del> <u>Provide for</u> conservation activities, including soil conservation and pest control, throughout Rural Zones.</p>	Reject	Do not support recommendation
RURZ-P6	Oppose in part	<p>Industrial activities should be appropriately located in an Industrial Zone. Industrial activities in the Rural Zones should be limited to those that support primary production.</p> <p>Existing Industrial activities in the Rural Zones can rely on existing use rights.</p>	<p>Amend RURZ-P6 as follows:</p> <p><del>Industrial</del> <u>Rural</u> Industry activity</p> <p>In relation to <del>industrial a rural</del> <u>industry</u> activity:</p> <ol style="list-style-type: none"> <li>1. provide for rural industry where the scale of the activity is</li> </ol>	Reject	Do not support recommendation

compatible with the character and amenity values of the rural zone;

2. ~~limit~~avoid the establishment of industrial activity (other than rural industry) ~~to~~ circumstances where:

a) ~~there is no reasonable and available site for the activity within any Industrial Zones;~~

b) ~~amenity values and character of the Rural Zones can be maintained;~~

c) ~~the scale of the industrial activity is such that it will not affect the~~



availability of highly productive land within the zone to be used for primary production; to the extent that the productive potential of rural land to meet the reasonably foreseeable needs to future generations is undermined; and

d) the nature, scale and degree of permanent changes that will occur on the land and soil resources on the site where the activity is

located is  
minimised:

3. ensure that any rural industry or other industrial activity does not limit or constrain the operation of any existing primary production activity in the zone, and does not have adverse effects on any sensitive activity;
4. provide for existing large-scale industrial activities outside of urban environments where these are well established and have been in

			<p>continuous industrial use, in order to recognise their existing environmental effects; and</p> <p>5. to the extent practicable, manage adverse effects of rural industry or other industrial activities so that they are internalised within the site and any adverse effects not internalised are minimised.</p>		
RURZ-P7	Support	Provides guidance for appropriate retail in rural zones	Retain as notified	Accept	Support
RURZ-P8	Support	Reverse sensitivity is a key issue for growers. It impacts the efficient use of land in the rural zones for primary production.	Retain as notified	Accept	Support

<p>New policy RURZ-PX Farm workers accommodation</p>	<p>New Policy</p>	<p>The plan does not provide for farm workers accommodation or seasonal workers accommodation. This will be especially difficult to provide in the GRUZ with the proposed 20ha residential unit density.</p>	<p>Insert as follows:</p> <p><b><u>Farm workers and seasonal workers accommodation</u></b></p> <p><u>Provide for farm workers and seasonal workers accommodation on a site of a rural production activity.</u></p>	<p>Reject</p>	<p>Do not support recommendation</p>
<p>GRUZ- Introduction</p>	<p>Support in part</p>	<p>Does not acknowledge the Class 1, 2 or 3 soils that are a significant resource for the District.</p>	<p>....</p> <p>The General Rural Zone makes up the majority of the rural area within the District. The focus of the zone is on retaining the productive potential of land to be able to be used for primary production activity and rural activities. <u>Primary production, particularly vegetable growing, depend on the availability of highly</u></p>	<p>Reject</p>	<p>Do not support recommendation</p>

productive land to produce food. Land Use Class 1, 2 and 3 soils are significant resource within the District. It is important to recognise the value and benefits associated with the use of Highly Productive Land, and to maintain the availability of Highly Productive Land for primary production for future generations. Highly Productive Land must be protected from inappropriate subdivision, use and development.

Built character is focused on residential units supporting primary production activities, activities that support rural activities and farming infrastructure,

			including sheds and farm tracks. The zone provisions seek to retain the focus of this zone, while retaining the current open rural character. ...		
GRUZ - O1	Oppose	<p>The Objective reads as if the economic benefits of primary production are the only consideration. This is inappropriate. There are many social, environmental and economic aspects to primary production that should be recognised.</p> <p>The objective is confused with reference to natural and physical resources as well as primary production activities.</p> <p>Overall, this objective will not provide the overarching supported needed as the objective for the GRUZ.</p>	<p>Delete GRUZ-O1 entirely and replace with:</p> <p><u>Subdivision, use, and development in rural areas that:</u></p> <ol style="list-style-type: none"> <li>1. <u>supports, maintains, or enhances the function and form, character, and amenity value of rural areas;</u></li> <li>2. <u>prioritises primary production, over other</u></li> </ol>	Reject	Do not support recommendation

			<p><u>activities to recognise its importance to the economy and wellbeing of the district;</u></p> <p>3. <u>allows primary production to operate without being compromised by reverse sensitivity and incompatible activities; and</u></p> <p>4. <u>retains a contrast in character to urban areas.</u></p>		
GRUZ - P1 Character of the General Rural Zone	Support	Aims to maintain the rural character.	Retain as notified	Accept	Support
GRUZ - P2 Limiting Fragmentation of land	Oppose in part	The proposed plan does not provide for seasonal workers accommodation and farm workers accommodation.	Amend GRUZ - P2 as follows:  Maintain opportunities for	Reject	Support

land to be used for primary production activities within the zone by limiting further fragmentation of land in a manner that that avoids sites being created, or residential units being erected, on sites that are less than 20ha, unless:

...

5. it is for the establishment of seasonal worker accommodation or farm worker accommodation where the site containing a residential unit is 20ha or greater, or is protected by a legacy provision in this District Plan.



<p>New Rule – GRUZ-RZ Seasonal worker accommodation</p>	<p>New Rule</p>	<p>Horticulture is a labour-intensive industry with seasonal employment peaks for some crops at harvest and pruning times. To assist in meeting this labour demand (and the ongoing shortage of seasonal workers), the Recognised Seasonal Employer (RSE) scheme was established by the Government in 2007. The scheme allows the horticulture and viticulture industries to recruit workers from overseas for seasonal work when there are not enough New Zealand workers.</p> <p>Immigration New Zealand (INZ) administer the scheme and has RSE worker accommodation standards that must be complied with to qualify RSE employers to recruit RSE workers. In some areas of New Zealand, INZ specifically require that RSE employers provide purpose-built accommodation for their RSE workers (unless criteria are met), to ensure that RSE workers are not occupying housing that would normally be available to local residents.</p> <p>Seasonal worker accommodation provides for temporary and often communal living arrangements; it is quite distinct from permanent worker</p>	<p>Insert new rule GRUZ-RX as follows:</p> <p><u>GRUZ-RX Seasonal worker accommodation</u>  <u>Activity status: PER</u>  <u>Where:</u></p> <ol style="list-style-type: none"> <li>1. <u>A maximum of 12 seasonal workers are accommodated on site at any one time.</u></li> <li>2. <u>No additional formed access ways are to be create</u></li> </ol>	<p>Reject</p>	<p>Do not support recommendation</p>
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accommodation which might support a full-time employee and their family. It is a definable activity that requires a specific resource management response to reflect the nature of the activity.

Further explanation is provided on pages 8 and 9 above.

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combination of communal kitchen and eating areas and sleeping and ablution facilities.

5. 1 parking space per 6 workers is provided on site

6. The buildings comply with Code of

			<p><u>Practice for Able Bodied Seasonal Workers, published by Dept of Building and Housing 2008.</u></p> <p><u>Activity status when compliance with GURZ-RX is not achieved: RDIS</u></p>		
New Rule - GRUZ-RX Seasonal worker accommodation	New Rule	As above.	<p>Insert new rule as follows:  <u>GRUZ-RX Seasonal worker accommodation</u>  <u>Activity Status: RDIS</u></p>	Reject	Do not support recommendation

			<p><u>Matters of discretion are restricted to:</u></p> <p><u>RURZ-MD1- Natural environmental values</u></p> <p><u>RURZ-MD3 - Character and amenity values of the activity</u></p> <p><u>RURZ-MDX Seasonal workers accommodation</u></p> <p><u>Activity Status when not achieved: N/A</u></p>		
New Rule - GRUZ - RX - Artificial Crop protection structures	New Rule	Artificial Crop Protection Structures (ACPS) are structures that use permeable materials to cover and protect crops and are now essential for horticulture production of some crops. They are quite distinct from Greenhouses. Benefits of these structures include protect fruit from sunburn, windburn and hail, assist with spray coverage, reduce mowing and weeding, assist pruning and picking, and less birds get into the crops.	<p>Insert new rule as follows:</p> <p><u>GRUZ - RX - Artificial Crop protection structures</u></p> <p><u>Activity status: PER</u></p> <p><u>Where:</u></p> <p>1. Dark green or black cloth is used on vertical faces within 30m</p>	Reject	Support

		<p>HortNZ has experienced inconsistency in how these structures are controlled under 'generic' building or structure rules, due to the broadness of these definitions (and ensuing uncertainty in whether they are a building or not). Often then being caught by controls such as - yard setbacks, height limitations, height to boundary controls, building coverage limitations, impervious surface limitations, amenity controls (colour, reflectivity) etc. - which are not always relevant.</p> <p>There is additional discussion on these structures above on pages 9 and 10 of this submission.</p> <p>HortNZ seeks a specific, clear and appropriate rule framework for these structures.</p>	<p>of the boundary of the property.</p> <p>2. Green, black or white cloth is used on horizontal surfaces.</p> <p>4. The artificial crop protection structure is setback at least 5m from the boundary with an existing lawfully established residential unit on an adjacent lot.</p> <p>5. No maximum site coverage shall apply.</p> <p><u>Activity status when compliance with GURZ-RX is not achieved: RDIS</u></p>		
<p>New Rule - GRUZ - RX - Artificial Crop protection structures</p>	<p>New Rule</p>	<p>As above.</p>	<p>Insert new rule as follows:</p>	<p>Reject</p>	<p>Support</p>

			<p><u>GRUZ- RX - Artificial Crop protection structures</u></p> <p><u>Activity Status: RDIS</u></p> <p><u>Matters of discretion are restricted to:</u></p> <p><u>RURZ-MD1- Natural environmental values</u></p> <p><u>RURZ-MD3 - Character and amenity values of the activity</u></p> <p><u>Activity Status when not achieved: N/A</u></p>		
GRUS-R1 Construction or alteration of or addition to any building or other structure	Support	Enables Construction or alteration of or addition to any building or other structure as a permitted activity.	Retain as notified	Accept	Support
GRUS-R2 Primary production	Support in part	Enables horticulture as a permitted activity.	Amend GRUS-R2 as follows:	Reject	Support

Oppose carbon forest as a permitted activity unless the plan is amended to safeguard the life supporting capacity of soils, including LUC1, 2 and 3 soils.

GRUZ-R2 Primary production

This rule does not apply to mining provided for under GRUZ-R29; carbon forests, quarrying activities provided for under GRUZ-R30; farm quarry provided for under GRUZ-R12; intensive indoor primary production provided for under GRUZ-R17; or intensive outdoor primary production provided for under GRUZ-R18.

Where:

1. any forestry less than 1ha, ~~carbon forest~~ or woodlot shall be set back a minimum of:
  - a) 40m from any residential unit or minor residential



			<p>unit on a site under different ownership;</p> <p>b) 10m from any site boundary of a site under different ownership; and</p> <p>c) 10m from any road boundary of a paved public road.</p>		
GRUZ-R3 Residential unit	Support	Enables a residential unit as a permitted activity.	Retain as notified	Accept	Support
GRUZ-R4 Minor Residential unit	Support in part	<p>Oppose the limitation of a minor residential unit for a farm worker to a GFA of 90m<sup>2</sup>. This is an impractical limitation on farming units particularly intensive primary production activities where farm workers (and families) are typically required to live onsite and not in a seasonal working arrangement.</p> <p>The non-complying activity pathway for non-compliance is an appropriate resource management response for the scale and likely effect of this activity</p>	<p>Amend GRUZ-R4 as follows.</p> <p>where:</p> <p>...</p> <ul style="list-style-type: none"> <li><u>In the case of a minor residential unit used for farm workers accommodation and seasonal worker accommodation:</u></li> </ul>	Reject	Do not support recommendation

		which should be accommodated in the permitted activity standards.	- _____ limited to a <u>maximum GFA of 120m<sup>2</sup> (exclusive of garages, and decks);</u>		
GRUZ-R6 Accessory building or structure	Support	Enables accessory building or structures as a permitted activity	Retain as notified	Accept	Support
GRUZ - R10 Rural produce retail	Support	Enables appropriate scale of produce retail as a permitted activity subject to the relief sought by HortNZ on the definition of rural produce retail.	Retain as notified	Accept	Support
GRUZ - R11 Rural Industry	Oppose in part	<p>While the rule specifies that it relates to Rural industry, clause 2 conflicts with the national Planning Standards definition of Rural Industry and Primary Production by including <i>Initial</i> processing. Therefore, washing sorting and even slicing/dicing produce would be caught within this rule.</p> <p>A produce pack house falls within the definition of primary production (National Planning Standards definition Clause (c) <i>'includes any land and buildings used for the production of the commodities from (a_ and used for the initial processing of the commodities in b))</i>, and not rural industry.</p>	<p>Amend GRUS-R11 as follows:</p> <p>Where:</p> <p>...</p> <p>2. the manufacture, processing or production of goods involves <del>initial or</del> further processing of commodities derived from</p>	Support	Support

		A pack house should be a permitted activity subject to build form standards in rural zones.	primary production;		
GRUZ - R13 Conservation activities	Oppose	<p>Oppose the permitted activity status for conservation activities in the GRUZ. The activity definition includes a range of activities that would involve people and visitors into the rural environment that are potentially sensitive to the effects of primary production activities e.g., retail, nurseries, environmental research and education activities.</p> <p>The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response in this zone.</p>	Delete GRUZ-R13 or change activity status.	Reject	Do not support recommendation
GRUZ - R14 Recreation activities	Oppose	<p>Oppose the permitted activity status for recreation activities in the GRUZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response in this zone.</p>	Delete GRUZ-R14 or change activity status.	Reject	Do not support recommendation
GRUZ - R15 Rural tourism	Oppose	Oppose the permitted activity status for rural tourism in the GRUZ. These are sensitive activities likely to conflict with	Delete GRUZ-R15 or change activity status.	Reject	Do not support recommendation

		<p>all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response in this zone.</p> <p>Notably the permitted activity standards consider a setback necessary from a residential unit, or other sensitive activity but, with the exception of a 10m yard setback, no consideration of the activity situation relative to primary production is considered.</p>			
GRUZ - R21 Equestrian and ancillary activities and facilities	Support	Support the restricted discretionary activity status for Equestrian and ancillary activities and facilities in the GRUZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response.	Retain GRUZ-R21 activity status as notified.	Accept	Support
GRUZ - R22 Farmers Market	Support	Support restricted discretionary activity status for farmers markets within the GRUZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a	Retain GRUZ-R22 activity status as notified	Accept	Support

		permitted activity rule as being an appropriate resource management response.			
GRUZ - R25 Educational facility	Support	Support the discretionary activity status for educational facilities in the GRUZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response.	Retain GRUZ-R25 activity status as notified.	Accept	Support
GRUZ - R26 Community facility	Support	Support the discretionary activity status for community facilities in the GRUZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response.	Retain GRUZ-R26 activity status as notified.	Accept	Support
GRUZ - R27 Wedding and event facility	Support	Support the discretionary activity status for wedding and event facilities in the GRUZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response.	Retain GRUZ-R27 activity status as notified.	Accept	Support

<p>GRUZ - R28 Cemetery and funeral related services and facility</p>	<p>Support</p>	<p>Support the discretionary activity status for Cemetery and funeral related services and facilities in the GRUZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response.</p>	<p>Retain GRUZ-R28 activity status as notified.</p>	<p>Accept</p>	<p>Support</p>
<p>GRUZ - R31 Waste management facility</p>	<p>Support</p>	<p>Support the discretionary activity status for waste management facilities in the GRUZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response.</p>	<p>Retain GRUZ-R31 activity status as notified.</p>	<p>Accept</p>	<p>Support</p>
<p>GRUZ - R33 Recreation facilities</p>	<p>Support</p>	<p>Support the discretionary activity status for recreational facilities in the GRUZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response.</p>	<p>Retain GRUZ-R33 activity status as notified.</p>	<p>Accept</p>	<p>Support</p>

GRUZ - R34 Camping ground	Support	Support the discretionary activity status for camping grounds in the GRUZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response.	Retain GRUZ-R34 activity status as notified.	Accept	Support
GRUZ - R36 Sports shooting facility	Support	Support the discretionary activity status for sports shooting facilities in the GRUZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response.	Retain GRUZ-R36 activity status as notified.	Accept	Support
GRUZ - R35 Industrial Activity	Oppose in part	Oppose the discretionary activity status for industrial activities. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure. Only rural industry should be provided for as a discretionary activity in the GRUZ. Other industry must be appropriately provided for in Industrial Zones, as is for retail activities.	Amend GRUZ - R35 activity status to non-complying	Reject	Do not support recommendation

GRUZ - 38 Retail activity	Support	Support non-complying activity status for retail activities that are not associated with any activity that is provided for as a permitted, restricted discretionary or discretionary activity in the GRUZ.	Retain GRUZ-R38 activity status as notified.	Accept	Support
GRUS - R39 Retirement Village	Support	Support non-complying activity status for retirement villages. They require high levels of servicing and associated services which can only be appropriately provided for in urban environments.	Retain GRUZ-R39 activity status as notified.	Accept	Support
GRUZ - BFS1 Building coverage	Support	Provides for appropriate building coverage as a permitted activity.	Retain as notified	Accept	Support
GRUZ - BFS2 Impermeable surface	Support	Provides for appropriate impermeable surface as a permitted activity.	Retain as notified	Accept	Support
GRUZ - BFS3 Height	Oppose in part	The standard needs to specify that the 12m height limit does not include the blades of a frost fan and wind turbines.	Amend GRUZ-BFS3 as follows: ... 2. The maximum height for any other building or structure shall be 12m above ground level. <u>3. The maximum height of frost</u>	Accept	Support



			<u>control fans and wind turbines shall be 12m above ground level (not including blades).</u>		
GRUZ - BFS4 Building and structure setbacks	Support	Provides for appropriate setbacks as a permitted activity.	Retain as notified		
GRUS - BFS6 Gross Floor Area	Support	Provides for appropriate gross floor area as a permitted activity.	Retain as notified		
<b>RLZ - Rural Lifestyle Zone</b>					
Introduction	Oppose in part	<p>Support the purpose of the Rural Lifestyle Zone as described in the introduction which is to provide for primary productive activities, those activities that support rural activities and those that rely on the natural resources that exist in the zone, while recognising that the predominant character is derived from smaller sites. Although the introduction would benefit from acknowledging that horticulture is a common land use in this zone.</p> <p>However, the purpose set out in the introduction, confusingly is different to that set out in RLZ-O1, notably omitting</p>	<p>Amend introduction as follows:</p> <p>...</p> <p>The Rural Lifestyle Zone, focused in the east of the District, recognises that this area comprises the densest residential unit and development site pattern in the rural areas of the District. This rural area is defined by its fine</p>	Reject	Do not support recommendation

		<p>a reference to physical resources and a change in terminology from 'providing' for primary production activities, to stating that they 'occur' in the zone.</p>	<p>grained pattern of development and human induced characteristics. <u>The majority of horticultural operations within the district occur within this zone, including greenhouse growing which can be highly productive on smaller sites.</u></p>		
<p>RLZ - O1 Purpose</p>	<p>Oppose in part</p>	<p>Support a clear objective however there are concerns with the inconsistency between the objective of this zone and the purpose set out in the introduction.</p>	<p>Amend RLZ-O1 as follows:</p> <p><u>Enable</u> Primary production activities and activities reliant on the natural and physical resources of the rural environment <del>occur</del> while recognising that the predominant character is small rural sites with a more intensive pattern of land use and buildings than the General Rural Zone.</p>	<p>Reject</p>	<p>Do not support recommendation</p>

<p>RLZ - P1 Character</p>	<p>Oppose in part</p>	<p>The policy assumes that if a primary production activity is occurring on a smaller site, then it will be of a small scale. There are significant horticulture operations within the RLZ operating on 'smaller sites'. The majority of existing horticulture operations in the district are within the RLZ and are not necessarily 'small scale' for horticulture.</p>	<p>Amend PLZ-P1 as follows:</p> <p>Maintain the character in the Rural Lifestyle Zone which comprises:</p> <ol style="list-style-type: none"> <li>1. a highly modified landscape strongly influenced by fine grained patterns and processes of human induced activity, including a predominance of small rural lots with a resulting pattern of residential units, buildings, fencing, amenity and domestic planting mixed with smaller scale</li> </ol>	<p>Reject</p>	<p>Do not support recommendation</p>
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			<p>primary production activities;</p> <p>...</p>		
RLZ -P2 Activities	Oppose in Part	The proposed plan does not provide for seasonal workers accommodation and farm workers accommodation.	<p>Amend RLZ-P2 as follows:</p> <p>...</p> <p>5. <u>it is for the establishment of seasonal worker accommodation or farm worker accommodation where the site containing a residential unit is 4ha or greater, or is protected by a legacy provision in this District Plan.</u></p>	Reject	Do not support recommendation
New Rule - RLZ-RX Seasonal worker accommodation	New Rule	Horticulture is a labour-intensive industry with seasonal employment peaks for some crops at harvest and pruning times. To assist in meeting this labour demand (and the ongoing shortage of seasonal workers), the Recognised Seasonal Employer (RSE) scheme was established by the	<p>Insert new rule RLZ-RX as follows:</p> <p><u>RLX-RX Seasonal worker accommodation</u>  <u>Activity status: PER</u>  <u>Where:</u></p>	Reject	Do not support recommendation

Government in 2007. The scheme allows the horticulture and viticulture industries to recruit workers from overseas for seasonal work when there are not enough New Zealand workers.

Immigration New Zealand (INZ) administer the scheme and has RSE worker accommodation standards that must be complied with to qualify RSE employers to recruit RSE workers. In some areas of New Zealand, INZ specifically require that RSE employers provide purpose-built accommodation for their RSE workers (unless criteria are met), to ensure that RSE workers are not occupying housing that would normally be available to local residents.

Seasonal worker accommodation provides for temporary and often communal living arrangements; it is quite distinct from permanent worker accommodation which might support a full-time employee and their family. It is a definable activity that requires a specific resource management response to reflect the nature of the activity.

Further explanation is provided on pages 8 and 9 above.

1. A maximum of 12 seasonal workers are accommodated on site at any one time.
2. No additional formed access ways are to be created to any State Highway.
3. The accommodation

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used  
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on a  
seasonal  
basis  
to  
meet  
labour  
requirements  
in  
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horticulture  
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			<p><u>hed by Dept of Building and Housing 2008.</u></p> <p><u>Activity status when compliance with GURZ-RX is not achieved: RDIS</u></p>		
New Rule - RLZ-RX Seasonal worker accommodation	New Rule	As above.	<p>Insert New rule as follows:  <u>RLZ-RX Seasonal worker accommodation</u>  <u>Activity Status: RDIS</u></p> <p><u>Matters of discretion are restricted to:</u></p> <p><u>RURZ-MD1- Natural environmental values</u>  <u>RURZ-MD3 - Character and</u></p>	Reject	Do not support recommendation



			<u>amenity values of the activity</u> <u>RURZ-MDX</u> <u>Seasonal workers accommodation</u>  <u>Activity Status when not achieved: N/A</u>		
New Rule - RLZ - RX - Artificial Crop protection structures	New Rule	<p>Artificial Crop Protection Structures (ACPS) are structures that use permeable materials to cover and protect crops and are now essential for horticulture production of some crops. They are quite distinct from Greenhouses. Benefits of these structures include protect fruit from sunburn, windburn and hail, assist with spray coverage, reduce mowing and weeding, assist pruning and picking, and less birds get into the crops.</p> <p>HortNZ has experienced inconsistency in how these structures are controlled under 'generic' building or structure rules, due to the broadness of these definitions (and ensuing uncertainty in whether they are a building or not). Often then being caught by controls such as - yard setbacks, height</p>	<p>Insert new rule as follows:  <u>RLZ - RX - Artificial Crop protection structures</u>  <u>Activity status: PER</u>  <u>Where:</u></p> <ol style="list-style-type: none"> <li>1. Dark green or black cloth is used on vertical faces within 30m of the boundary of the property.</li> <li>2. Green, black or white cloth is used on horizontal surfaces.</li> <li>4. The artificial</li> </ol>	Reject	Support

		<p>limitations, height to boundary controls, building coverage limitations, impervious surface limitations, amenity controls (colour, reflectivity) etc. - which are not always relevant.</p> <p>There is additional discussion on these structures above on pages 9 and 10 of this submission.</p> <p>HortNZ seeks a specific, clear and appropriate rule framework for these structures.</p>	<p>crop protection structure is setback at least 5m from the boundary with an existing lawfully established residential unit on an adjacent lot.</p> <p>5. No maximum site coverage shall apply.</p> <p><u>Activity status when compliance with GURZ-RX is not achieved: RDIS</u></p>		
New Rule - RLZ - RX - Artificial Crop protection structures	New Rule	As above.	<p>Insert new rule as follows:</p> <p><u>RLZ- RX - Artificial Crop protection structures</u></p> <p><u>Activity Status: RDIS</u></p> <p><u>Matters of discretion are restricted to:</u></p>	Reject	Support

			<p><u>RURZ-MD1- Natural environmental values</u></p> <p><u>RURZ-MD3 - Character and amenity values of the activity</u></p> <p><u>Activity Status when not achieved: N/A</u></p>		
RLZ - R2 Primary production	Oppose in part	<p>HortNZ supports that RLZ-R2 enables horticulture as a permitted activity.</p> <p>Carbon forests are to remain in perpetuity. Oppose carbon forest as a permitted activity unless the plan is amended to safeguard the life supporting capacity of soils, including LUC 1, 2 and 3 soils.</p>	<p>Amend as follows:</p> <p>RLZ-R2 Primary production</p> <p>This rule does not apply to any <u>carbon forestry</u>, farm quarry provided for under RLZ-R12; intensive indoor primary production provided for under RLZ-R18; intensive outdoor primary production provided for under RLZ-R19; mining provided for under RLZ-R30; or quarrying activity</p>	Reject	Support

provided for under RLZ-R31.

Where:

1. any forestry less than 1ha, ~~carbon forest~~ or woodlot shall be set back a minimum of:
  - a) 40m from any residential unit or minor residential unit on a site under different ownership;
  - b) 10m from any site boundary of a site under different ownership; and
  - c) 10m from any road boundary of a paved public road.

<p>RLZ - R4 Minor residential unit</p>	<p>Oppose in part</p>	<p>Support the provision of a minor residential unit.</p> <p>Oppose the limitation of a minor residential unit for a farm worker to a GFA of 90m<sup>2</sup>. This is an impractical limitation on farming units particularly intensive primary production activities where farm workers (and families) are typically required to live and have their families onsite and not in a seasonal working arrangement.</p> <p>The non-complying activity pathway for non-compliance is an appropriate resource management response for the scale and likely effect of this activity which should be accommodated in the permitted activity standards.</p>	<p>Amend RLZ-R4 as follows.</p> <p>where: <u>In the case of a minor residential unit used for farm workers accommodation:</u> - _____ limited to a maximum GFA of 120m<sup>2</sup> (exclusive of garages, and decks).</p> <p>Retain RLZ-R2 as proposed.</p>	<p>Reject</p>	<p>Do not support recommendation</p>
<p>RLZ - R13 Conservation activities</p>	<p>Oppose</p>	<p>Oppose the permitted activity status for conservation activities in the RLZ. The activity definition includes a range of activities that would involve people and visitors into the rural environment that are potentially sensitive to the effects of primary production activities e.g., retail, nurseries, environmental research and education activities.</p> <p>The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an</p>	<p>Delete RLZ-R13 or change activity status.</p>	<p>Reject</p>	<p>Do not support recommendation</p>

		appropriate resource management response in this zone.			
RLZ - R14 Recreation activities	Oppose	Oppose the permitted activity status for recreation activities in the GRUZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response in this zone.	Delete RLZ-R14 or change activity status.	Reject	Do not support recommendation
GRUZ - R15 Rural tourism	Oppose	Oppose the permitted activity status for rural tourism in the RLZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response in this zone.  Notably the permitted activity standards consider a setback necessary from a residential unit, or other sensitive activity but, with the exception of a 10m yard setback, no consideration of the activity situation relative to intensive primary production is considered.	Delete RLZ-R15 or change activity status.	Reject	Do not support recommendation

RLZ - R22 Equestrian and ancillary activities and facilities	Support	Support the restricted discretionary activity status for Equestrian and ancillary activities and facilities in the RLZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response.	Retain RLZ-R22 activity status as proposed.	Accept	Support
RLZ - R23 Farmers market	Support	Support the restricted discretionary activity status for farmers markets in the RLZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response.	Retain RLZ-R23 activity status as proposed.	Accept	Support
RLZ - R26 Educational facility	Support	Support the discretionary activity status for educational facilities in the RLZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response.	Retain RLZ-R26 activity status as proposed.	Accept	Support
RLZ - R27 Community facility	Support	Support the discretionary activity status for community facilities in the RLZ. These are sensitive activities likely to	Retain RLZ-R27 activity status as proposed.	Accept	Support

		conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response.			
RLZ - R28 Wedding and event facility	Support	Support the discretionary activity status for wedding and event facilities in the RLZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response.	Retain RLZ -R28 activity status as proposed.	Accept	Support
RLZ - R29 Cemetery and funeral related services and facility	Support	Support the discretionary activity status for Cemetery and funeral related services and facilities in the RLZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response.	Retain RLZ -R29 activity status as proposed.	Accept	Support
RLZ - R32 Waste management facility	Support	Support the discretionary activity status for Waste management facilities in the RLZ. These are activities likely to conflict with all primary production activities, particularly in regard to biosecurity. The activities are not supported by an	Retain RLZ -R32 activity status as proposed.	Accept	Support



		objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response.			
RLZ - R34 Recreation facilities	Support	Support the discretionary activity status for Recreation facilities in the RLZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response.	Retain RLZ -R34 activity status as proposed.	Accept	Support
RLZ -R35 Camping ground	Support	Support the discretionary activity status for camping grounds in the RLZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response.	Retain RLZ -R35 activity status as proposed.	Accept	Support
RLZ - R37 Sports shooting facility	Support	Support the discretionary activity status for sports shooting facility in the RLZ. These are activities likely to conflict with all primary production activities particularly in terms of bringing people into the working rural environment and also stock disturbance. The activities are not supported by an objective and policy structure that leads to a	Retain RLZ -R37 activity status as proposed.	Accept	Support

		permitted activity rule as being an appropriate resource management response.			
<p>RLZ - R38</p> <p>Any other activity not provided for in this zone as a permitted, controlled, restricted discretionary, discretionary, non-complying, or prohibited activity, except where expressly specified by a district wide provision</p>	Support	Support the Discretionary Activity status for non-compliance.	Retain RLZ -R38 as proposed.	Accept	Support
<b>Matters of Discretion for all Rural Zones</b>					
New Matters of Discretion for all Rural Zones - RURZ-MDX - Seasonal workers accommodation	New Matters of discretions	As above	<p>Insert new Matter of discretion RURZ-MDX as follows:</p> <p><u>RURZ-MDX</u> <u>Seasonal workers accommodation</u></p> <ol style="list-style-type: none"> <li><u>Methods to avoid, remedy or mitigate the</u></li> </ol>	Reject	Do not support recommendation

			<p><u>effects on existing activities, including the provision of screening, landscaping and methods for noise control.</u></p> <p>2. <u>The extent to which the application complies with the Code of Practice for Able Bodied Seasonal Workers, published by Dept of Building and Housing 2008.</u></p>		
RURZ - MD3 Character and amenity values of the activity	Oppose in part	<p>The criteria could be improved to:</p> <ul style="list-style-type: none"> <li>Identify that it is not the character and amenity values of the activity that is being considered but the effects of that activity on character and amenity values.</li> </ul>	<p>Amend RURZ-MD3 as follows:</p> <p>Character and amenity values of the activity</p> <p>...</p>	Accept in part	Support

		<ul style="list-style-type: none"> <li>• Address reverse sensitivity on lawfully established activities not limited to adjacent sites.</li> <li>• Require consideration of alternative locations.</li> </ul>	<p>4. The extent to which the activity may result in conflict and/or reverse sensitivity effects with other <u>permitted and lawfully established</u> activities occurring on adjacent rural sites.</p> <p>...</p> <p>9. <u>The extent to which alternative locations have been considered.</u></p>		
RURZ - MD8 Setbacks	Oppose in part	<p>The criteria could be improved to:</p> <ul style="list-style-type: none"> <li>• Address reverse sensitivity on lawfully established activities not limited to adjacent sites.</li> <li>• Require consideration of alternative locations.</li> </ul>	<p>Amend RURZ-MD8 as follows:</p> <p>Setbacks</p> <p>...</p> <p>6. The extent to which the activity may result in conflict and/or reverse sensitivity effects with other <u>permitted or lawfully</u></p>	Reject	Do not support recommendation

			<p><u>established activities</u> occurring on adjacent rural properties sites.</p> <p>...</p> <p><u>10. The extent to which alternative locations have been considered.</u></p>		
GIZ - BFS9 Outdoor Storage area	Support	Solid fencing can assist in reducing reverse sensitivity effects between activities and impacts on amenity.	Retain as notified	Accept	Support
SD-02	Support in part	HortNZ supports SD-O2 but considers that it can be strengthened and provide greater balance of considerations if avoidance of versatile soils and reverse sensitivity impacts on primary production were added.	Amend SD-O2: " ... <u>11. that avoids versatile soils and avoids creating incompatible activities on rural zone boundaries.</u> "	Reject	Support
SD-04	Support in part	HortNZ supports a separate rural strategic objective and in particular supports the wording of the strategic objective but considers that the name	Amend title of SD-O4 to "Rural Environment".	Accept	Do not support recommendation

		'rural land' doesn't encompass all that the objective seeks to achieve or respond to	Retain balance of SD-O4.		
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