

**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 10A: Airport Noise/Bird
Strike

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

1 February 2024

PURPOSE AND SCOPE OF EVIDENCE

1. This statement responds to the Section 42A report recommendations in regard to Stream 10A that addresses the Christchurch International Airport Limited (CIAL) submissions regarding bird strike.
2. Horticulture New Zealand (HortNZ) is a further submitter to the CIAL submission and supports the Section 42A recommendation to reject the CIAL request to impose regulatory controls on a range of activities (including '*Fruit Tree Farms*') within the area surrounding the airport.
3. HortNZ will not be appearing at the hearing and I request that my statement is tabled for the panels deliberations.
4. I provide information to the panel on bird activity within horticultural operations and the measures undertaken by growers to manage bird activity.

INTRODUCTION

5. My name is Sarah Cameron. I am a Senior Environmental Policy Advisor at 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.
6. I have previously appeared in front of the panel and refer the panel to that evidence to highlight horticultural activity in the Waimakariri District, wider Canterbury region and the need to ensure growth and future land use change in the district is not curtailed by unnecessary regulation.
7. 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.
8. On behalf of growers, HortNZ takes a detailed involvement in resource management planning processes as part of its national and regional environmental policy response.

GENERAL COMMENTS

9. CIAL sought a range of provisions concerning the potential for CIAL operations to experience reverse sensitivity effects relating to potential growth of noise sensitive activities within the airport noise contours and to control a range of land use activities.
10. CIAL submission states that the land use activity of '*Fruit Tree Farms*' should be controlled. This is not a term I am familiar with. I am not aware of its use as a defined term elsewhere and am aware of the need for clear

definitions in planning documents. It is not clear what fruit or farming system CIAL consider causes a bird strike risk within the term '*Fruit Tree Farm*'.

11. HortNZ further submission opposed CIAL provisions as it was considered that the outcomes sought through the submission were unclear and there could be a significant impact on the existing and future horticulture industry.
12. There has been no engagement from CIAL with the horticulture industry on this matter such that CIAL might then better understand horticultural activity within the district, region or nationally.
13. It is disappointing that CIAL have chosen not to engage. This would have presented an opportunity for HortNZ to explain various horticultural growing systems (including covered and uncovered), the different types of fruit grown and likely to be grown in the future and importantly, the existing industry initiatives and measures growers take to manage birds on orchards and crops. This is not something new to the horticultural sector.
14. The lack of engagement by CIAL with the horticultural sector means that the assessment of the need for regulation is deficient and ill-informed.

BIRD ACTIVITY IN HORTICULTURE

15. Bird activity can have effects on horticulture production including crop volume, quality, biosecurity, pathogens (human health and safety). However, there are a number of variables that can relate to the fruit or vegetable crop type, the growing system including crop cover and harvesting techniques, the birds present in an area and seasonality. For example:
 - On some fruit (e.g. kiwifruit) birds are generally more active in orchards in spring when bud break occurs and fruit starts to develop. On other fruit birds are only a management issue at harvest
 - Birds do not roost in orchards during winter due to the lack of foliage and food source
 - In some regions, vegetable crops can be impacted by some birds. Ducks are partial to lettuce hearts and birds can disrupt seeds which have just been sowed
 - Different crops can have different levels of attractiveness to birds and not all orchards and crops have bird issues. Generally this is a management issue for fruit such as cherries, kiwifruit, berries, apples, oranges, plums, grapes, crab-apples, and prickly pear
 - Different bird species in different regions may require different management responses.

MEASURES TO MANAGE BIRD ACTIVITY

16. Where bird management is required, it is the experience of the horticultural sector that this requires constantly adapted, integrated management techniques. Birds acclimatise easily to any one measure therefore a holistic approach is best.
17. Effective and acceptable bird control measures, including audible bird scaring devices (ABSD) are required to avoid personal and community losses.

BIRD SCARING MEASURES

18. The most common ABSD used in New Zealand is the gas gun. LPG is ignited in a blast tube to create a loud bang or boom and electronic controls are used to control run time, firing interval and number of shots per cycle. Some gas guns are stationary, ground-based models; others are portable and can be mounted on a vehicle. Commonly used are units on a tripod mount, that rotate with each blast.

Picture one: A gas gun



19. Other ABSD that are less commonly used include sonic (audible) sound equipment that broadcasts a variety of naturally recorded bird distress signals, predator calls and harassment sounds that frighten, confuse and disorient pest birds, within the effective range).
20. There are a range of non-audible bird scarer devices and/or mitigations growers deploy:
 - **Crop covers** can be employed permanently or seasonally to provide a physical barrier to prevent birds interacting with trees and crops.
 - **Reflective tape, kites, balloons** rely on the wind and sun to be effective. Birds find them scary and unsettling so keep away in the short term, but they do get used to this relatively quickly, therefore these typically are applied in conjunction with other measures

- **Intensive sward planting** allows the grass sward to grow longer to retain the poa annua grass seed heads to provide a food source for some birds on the orchard floor. This reduces the incidence of birds in the canopy looking for food as they are more likely to remain on the ground to feed
- **Ultrasonic high frequencies** (which the human ear cannot hear) to deter birds and other pests. When the birds or pests hear the sound being produced, they can become disoriented or irritated by the noise
- **Laser bird scarers** are used by some growers to prevent bird strike as they unsettle and annoy birds.
- **Bird repellents (agricultural chemicals)** Include approved products used as a repellent by stimulating the 'trigeminal nerves' in the bird's beak, eyes and throat irritating a bird's sense of taste and smell.

HORTICULTURE ACTIVITY AROUND AIRPORTS

21. Horticultural activity in close proximity to airports is not uncommon in New Zealand.
22. For example, there are significant kiwifruit orchards very close to Tauranga airport.

Picture two kiwifruit orchards in proximity to Tauranga Airport



23. Next to the Timaru Airport there is a large apple orchard with a crop protection structure.

Picture three: Apple orchard next to Timaru Airport



24. I have not investigated the management systems these orchards have in place but would expect that where necessary, bird management is practiced.
25. I am not aware of any particular regulations imposed under the Tauranga City or Timaru District Plans for kiwifruit or apples in these locations but would assume this a relevant assessment for CIAL to consider. As is a consideration of the Christchurch City and Selwyn District response to this same matter.

CONCLUSION

26. HortNZ does not support the CIAL submission.
27. HortNZ supports the Section 42A recommendation to reject the CIAL submission where it seeks to regulate horticulture in areas surrounding the airport.
28. There has been no engagement by CIAL with the horticultural sector and we do not understand the term '*Fruit Tree Farm*' and what fruit or farming systems are of concern to CIAL.
29. The management of birds is not a new activity for growers who by necessity have advanced knowledge and experience.
30. It is not clear why district plan regulation for current grower practice used to avoid the effects of birds on crops would be effective, efficient or necessary.

Sarah Cameron

1 February 2024

Appendix 1

Provision	Support/oppose	Reason	Decision sought	S42 Recommendation	HortNZ Decision
Definitions					
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 parks and reserves, beach areas and open space and recreation zones.</p> <p>This includes:</p> <ul style="list-style-type: none"> a) pest control; b) fencing; c) plant nurseries; d) conservation and restoration planting; e) planting for stormwater treatment, erosion and coastal protection; and carbon 	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, forestry and horticulture <u>and other rural activities</u> , and only used within the property of extraction. It includes the extraction of material for farm and forestry tracks, accessways and hardstand areas on the property of origin. It does not include the exportation or removal of extracted material (including any aggregate) from the property of origin or for retail or	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 grown or produced on the site and products manufactured from it <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><u>Horticultural Greenhouse</u> 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><u>Seasonal worker accommodation</u> 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>		
GRUZ - General Rural Zone					
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 4th 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 support 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"> • primary production activities, • activities that directly support primary production, and • activities with a functional need. 	<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 part of the character of each rural zone 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"> 1. providing <u>enabling</u> for primary production activities; 2. providing for <u>enabling</u> those activities that directly support primary production, or those activities with a functional need to be located within Rural Zones, where: ... 		
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>Enable <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>Industrial <u>Rural</u> Industry activity</p> <p>In relation to industrial a rural <u>industry</u> activity:</p> <ol style="list-style-type: none"> 1. provide for rural industry where the scale of the activity is 	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><u>Farm workers and seasonal workers accommodation</u></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"> 1. <u>supports, maintains, or enhances the function and form, character, and amenity value of rural areas;</u> 2. <u>prioritises primary production, over other</u> 	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"> 1. <u>A maximum of 12 seasonal workers are accommodated on site at any one time.</u> 2. <u>No additional formed access ways are to be create</u> 	<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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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> <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 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 90m². 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"> <u>In the case of a minor residential unit used for farm workers accommodation and seasonal worker accommodation:</u> 	Reject	Do not support recommendation

		which should be accommodated in the permitted activity standards.	- _____ limited to a <u>maximum GFA of 120m² (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 initial or 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	<p>Oppose the permitted activity status for rural tourism in the GRUZ. These are sensitive activities likely to conflict with</p>	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		
RLZ - Rural Lifestyle Zone					
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

		a reference to physical resources and a change in terminology from 'providing' for primary production activities, to stating that they 'occur' in the zone.	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>		
RLZ - O1 Purpose	Oppose in part	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.	Amend RLZ-O1 as follows: <u>Enable</u> Primary production activities and activities reliant on the natural and physical resources of the rural environment occur 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.	Reject	Do not support recommendation

RLZ - P1 Character	Oppose in part	<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"> 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 	Reject	Do not support recommendation
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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

is
used
solely
on a
seasonal
basis
to
meet
labour
requirements
in
the
horticulture
sector

4. The
accommodation
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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:</p> <p><u>RLZ-RX Seasonal worker accommodation</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</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"> 1. Dark green or black cloth is used on vertical faces within 30m of the boundary of the property. 2. Green, black or white cloth is used on horizontal surfaces. 4. The artificial 	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 90m². 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 120m² (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
Matters of Discretion for all Rural Zones					
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"> <u>Methods to avoid, remedy or mitigate the</u> 	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"> 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. 	<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"> • Address reverse sensitivity on lawfully established activities not limited to adjacent sites. • Require consideration of alternative locations. 	<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"> • Address reverse sensitivity on lawfully established activities not limited to adjacent sites. • Require consideration of alternative locations. 	<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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