

SUBMISSION ON

Draft Plan Change A: Rural and Flood Channel Review

24 November 2023

To: Manawatū District Council

Name of Submitter: Horticulture New Zealand

Supported by: Vegetables New Zealand, Potatoes New Zealand, Persimmon Industry Council

Contact for Service:

Leanne Roberts

Senior Environmental Policy Advisor

Horticulture New Zealand

PO Box 10-232 WELLINGTON

Ph: 0275461655

Email: leanne.roberts@hortnz.co.nz

OVERVIEW

Submission structure

- 1 Part 1: HortNZ's Role
- 2 Part 2: Executive Summary
- 3 Part 3: Submission

Our submission

Horticulture New Zealand (HortNZ) thanks Manawatū District Council for the opportunity to submit on the draft plan change A: rural and flood channel review and welcomes any opportunity to continue to work with Manawatū District Council and to discuss our submission.

HortNZ could not gain an advantage in trade competition through this submission.

HortNZ wishes to be heard in support of our submission and would be prepared to consider presenting our submission in a joint case with others making a similar submission at any hearing.

The details of HortNZ's submission and decisions we are seeking are set out in our submission below.

HortNZ's Role

Background to HortNZ

HortNZ represents the interests of approximately 4,200 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruit, and vegetables. The horticultural sector provides over 40,000 jobs.

There are approximately 80,000 hectares of land in New Zealand producing fruit and vegetables for domestic consumers and supplying our global trading partners with high quality food.

It is not just the direct economic benefits associated with horticultural production that are important. Horticulture production provides a platform for long term prosperity for communities, supports the growth of knowledge-intensive agri-tech and suppliers along the supply chain; and plays a key role in helping to achieve New Zealand's climate change objectives.

The horticulture sector plays an important role in food security for New Zealanders. Over 80% of vegetables grown are for the domestic market and many varieties of fruits are grown to serve the domestic market.

HortNZ's purpose is to create an enduring environment where growers prosper. This is done through enabling, promoting and advocating for growers in New Zealand.



HortNZ's Resource Management Act 1991 Involvement

On behalf of its grower members HortNZ takes a detailed involvement in resource management planning processes around New Zealand. HortNZ works to raise growers' awareness of the Resource Management Act 1991 (RMA) to ensure effective grower involvement under the Act.



Executive Summary

Plan Change A: Rural and Flood Channel Review

HortNZ is largely supportive of the draft plan change. The objectives set a clear expectation that the GRUZ is for rural activities and the rest of the plan.

HortNZ has sought to include definitions on:

- Artificial Crop Protection Structures
- Crop Support Structures

Remove 'produce' from the definition of Intensive indoor farming.

HortNZ has also discussed the challenges of the NPS HPL and consideration of how to provide for buildings that support primary production such as independent post-harvest facilities (packhouses).

Submission

1. Horticulture in Manawatū District

Manawatū District is located within the Manawatū-Whanganui Horizons region. This area plays an important role in the national food system.

There is a diverse climate within the region. This is because the region covers a large area, from the central plateau in the mid-North Island that has higher rainfall, snow and lower median average temperatures, to lower rainfall in the western coastal areas, more wind and a relatively higher median average temperature. Generally, the climate is considered mild and less prone to extremes than in other areas of New Zealand¹. The climate works well for many types of horticultural production, but the predominant land uses lend well to incorporating short-rotational cropping into farming systems. According to the Landcover database, there are 4558.7ha of horticultural crop land in the Manawatū District, with the majority of this, 4549.5ha is in short-rotational cropland²

Crops grown in the Manawatū District include brassicas, leafy greens, onions, pumpkins, butternut squash, peas, feijoas, asparagus, potatoes. The district plays an important role in the national food system.

The Manawatū District has long been recognised for its productive capacity and has a long history of occupation in the area³. The soils and climate provide an idea climate for growing a wide range of horticultural crops. This helped to support a robust pre-colonial economy with crops being traded with other communities outside the region⁴.

2. National direction and horticulture

The Paris Agreement speaks to a 'fundamental priority of safeguarding food security' and action in a manner that does not threaten food production. Food security is a nationally important issue which needs to be addressed at a strategic level. We have a national food producing system that relies on growing vegetables and fruit in pockets of highly productive land (HPL), with good climate and access to freshwater.

The price of New Zealand grown fresh fruit and vegetables has been steadily increasing prior to these weather events⁵. This can be attributed to labour shortages, increased costs in compliance, increased costs of horticultural supplies as well as freight and energy costs⁶. The increase of energy costs directly impacts the cost of production in New Zealand of fresh produce. Consumers are price driven, and the consequence of high production costs of New Zealand produce is that retailers will look to import produce or bring in substitutes to

¹ [NIWA ManawatuWanganui Climate WEB.PDF](#)

² [LCDB v5.0 - Land Cover Database version 5.0, Mainland, New Zealand | LRIS Portal \(scinfo.org.nz\)](#)

³ [Early Māori history - Te Ara Encyclopedia of New Zealand](#)

⁴ [Heritage resources: Heritage \(doc.govt.nz\)](#)

⁵ [Fruit and vegetables drive up annual food prices | Stats NZ](#)

⁶ [Food prices are up, but the cost to grow it has skyrocketed | Stuff.co.nz](#)

meet consumer expectations of price. Importing fresh fruit and vegetables produced in other countries that can otherwise be grown in New Zealand increases carbon leakage due to freight emissions and less climate-friendly growing and environmental practices in other countries.

2.1. Regulatory and legislative changes

There is a significant amount of regulatory change in progress affecting the rural community. Councils have obligations and responsibilities to some pieces, and others may be out of a local authority's direct scope.

These changes include (but are not limited to):

- NPSFM 2020 plan changes and development
- Climate Change Adaptation and planning
- NPS HPL amendments
- RMA reform
- Natural Hazard planning and response

Coupled with the recent national general election and uncertainty surrounding the future direction the new government will take, this has had an impact on the primary production community.

2.2. Weather impacts

Vulnerabilities in our domestic food supply network were highlighted during recent weather events when availability of fresh New Zealand grown produced was impacted by the recent rain events⁷. Cyclone Gabrielle caused damage to key horticultural growing areas such as the East Coast regions of Gisborne and Hawke's Bay, and other major growing hubs in Pukekohe and Northland were also affected⁸. Some parts of the Manawatū District were impacted during this event.

The timing of these events has also increased the scale of impact, as many seasonal crops were in their harvest period. Considerable investment into growing the crop has been lost, along with the product. There have been flow on impacts to employment, health and safety.

The recovery in some areas from these events is likely to be long, and the ongoing supply of fresh fruit and vegetables will be vulnerable during this recovery. The likelihood of severe weather events affecting the Manawatū, including flooding, are likely to increase with the advance of climate change⁹. It is important to retain a diverse geographical spread of

⁷ [Auckland storm event 9 May 2023 rapid analysis \(knowledgeauckland.org.nz\)](https://www.auckland.govt.nz/~/media/2023/05/09/rapid-analysis-auckland-storm-event-9-may-2023)

⁸ [Cyclone Gabrielle's impact on the New Zealand economy and exports - March 2023 | New Zealand Ministry of Foreign Affairs and Trade \(mfat.govt.nz\)](https://www.mfat.govt.nz/en/press-releases/2023/march-2023-cyclone-gabrielle-impacts-on-new-zealand-economy-and-exports)

⁹ [Climate change projections for the Manawatu-Whanganui region | Ministry for the Environment](https://www.mfe.govt.nz/press-releases/2023/03/climate-change-projections-for-the-manawatu-whanganui-region)

horticultural production across the country to reduce the overall risk to domestic food security.

3. Draft plan change A: Rural & flood channel review

HortNZ would like to acknowledge the strong direction taken in the Rural chapter to ensure the General Rural Zone (GRUZ) is clear on ensuring rural production activities are prioritised¹⁰. HortNZ would like to ensure areas that are within Flood Channel Zones and, are deemed inappropriate for housing development, are still able to be used for production purposes.

3.1. General Rural Zone (GRUZ)

HortNZ is generally supportive of the intent of the GRUZ chapter. However, we are mindful that many reverse sensitivity issues occur at the rural - urban boundary interfaces. It is important that intensification of urban area boundaries consider the reverse sensitivity issues rural production activities face. HortNZ advocates the use of tools such as setbacks and provides comment in the table below.

HortNZ supports rural lifestyle development being directed towards defined areas (e.g the Rural Lifestyle Zone) and a robust policy framework that limits ad-hoc development of inappropriate activities within the GRUZ. This is important for maintaining highly productive soils and the viability of horticultural operations within rural areas.

2.4 Highly Productive Land

HortNZ has a particular interest in the policy framework for highly productive land and seeks to be engaged with the council in discussions as to how highly productive land can be incorporated into the Plan development.

The National Policy Statement for Highly Productive Land (NPSHPL) seeks to protect highly productive land (HPL) for primary production uses. The objective and policies provide clear avoid policies against inappropriate subdivision, use and development of HPL. There are also specific protection clauses for existing use, productive uses and reverse sensitivity.

The NPSHPL has one objective: "Highly productive land is protected for use in land-based primary production, both now and for future generations". There are nine policies which support the objective. The policies set a clear pathway for HPL to be protected - urban rezoning, rezoning and development as rural lifestyle, and subdivision, are activities to be avoided. Policy 9 also provides for reverse sensitivity effects to be managed so as not to constrain land based primary production on HPL.

HortNZ is supportive of the definition of Highly Productive Land included in draft plan change A.

¹⁰ GRUZ-O1, GRUZ-O2, GRUZ-O3 & GRUZ-O4

While HortNZ supports this definition, consideration is needed in the plan to allow for buildings that support primary production on HPL. Some of these are subject to the current NPSHPL amendment consultation. Below are some examples of horticultural support buildings or activities that need to be considered:

PACKHOUSES

Post-harvest activities such as packhouses that are not part of an individual operation still need to be located in close proximity to horticultural operations. Independent packhouse and processing facilities need to be located near horticultural production areas for processing of produce. These are not on-site facilities. For example, this includes an independent packhouse that facilitates the washing, preparation, packing and distribution of produce on behalf of growers. Time is a critical factor for quality and processing of fresh produce. As soon as produce is harvested, the countdown on its shelf-life for a consumer begins. These activities directly support horticultural production, and they are often located on LUC 1-3 near where the produce is grown. Many of these facilities are long-established, servicing nearby horticultural enterprises, and have built up networks of suppliers and their labour force over a long period. To support the overall productivity of HPL, it may be desirable for new enterprises to relocate on other land; however, by locational need, this is not always the best outcome to support a production system.

GREENHOUSES

The NPSHPL also raises the question of where activities such as non-soil-based greenhouse production can be appropriately located. For efficiency's sake, non-soil based greenhouse production sites need to be located near established horticultural areas, distribution and transport networks, larger population areas, horticultural support services and infrastructure such as packhouses. As with other types of horticultural production, greenhouse growers are producing fresh produce for consumption, and access to markets and networks is key. Consideration needs to be given for where these types of activities will be located.

The above points are important to consider in the wider context of food security, resource availability and water quality. HortNZ has made some suggestions on ways to enable supporting activities, such as independent packhouses, could be considered.

In our view, it is important that urban development and productive land are considered together to provide a planned approach so new urban areas are designed in a manner that maintains the overall productive capacity of highly productive land. We are particularly concerned about reverse sensitivity pressures on growers.

2.5 Reverse Sensitivity

Reverse sensitivity issues are becoming an increasing problem for the horticulture sector as more people move into productive areas who do not have realistic expectations for the activities that can occur as part of primary production. Horticulture tends to be particularly susceptible to reverse sensitivity effects due to the location of highly productive land, often near urban centres or land under demand for urban development.

It is important for district plans to include a robust management response. Setbacks are an important management tool in helping to manage the potential for reverse sensitivity effects. As a permitted activity requirement, they do not preclude development within a lesser distance, but at least ensure that a site-specific assessment can be made through a resource consent process.

4. Providing for horticultural activities in the rural environment

3.2 Artificial Crop Protection Structures (ACPS) and Crop Support Structures (CSS)

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.

Crop Support Structures (CSS) extend to a variety of structures upon which various crops rely for growth and support and are positioned and designed to direct growth to establish canopies. They include 'A', 'T' and 'Y' frames, pergolas and fences.

Land use controls imposed by district plans have the most direct impact on the resource management regulatory framework for CSS and ACPS. It is here that growers typically have interaction and issues with the regulatory authority. 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). They are then often 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.

The National Planning Standards now define building. We note the following commentary from the Ministry for the Environment's 'Recommendations on Submissions Report for the first set of National Planning Standards' for 2I Definitions Standard¹¹:

"It was considered that any exclusion for a permeable roof could result in a loophole in the definition. Is a roof that leaks a permeable roof? How impermeable would it need to be to qualify? This could make it difficult for compliance and enforcement purposes. We consider that it would be better for the plan provisions (rather than the building definition) to clearly

¹¹ <https://environment.govt.nz/publications/2i-definitions-standard-recommendations-on-submissions-report-for-the-first-set-of-national-planning-standards/>

enable crop protection structures or other similar structures if this is the desired outcome” (pg 52)

In light of this, HortNZ has submitted seeking that a specific definition is provided for CSS and ACPS, so that a specific, clear and appropriate rule framework can be applied which includes a permitted activity rule for ACPS and CSS in the GRUZ.

Several district plans around the country specifically provide provisions for ACPS (including Whangarei, Auckland, Opotiki, Western Bay of Plenty, Whakatane, Hastings and Tasman).

3.3 Shelterbelts

Shelterbelts are part of primary production activities and assist in realising productive potential. They are an important tool for growers by providing shelter from wind and prevent agrichemical spray drift. Shelterbelts are also a mechanism that can reduce the potential for reverse sensitivity complaints as they form a barrier between the primary productive activity and adjoining properties.

Shelterbelts play an important role in providing protection from wind, mitigating spray drift and providing a necessary boundary for some crops.

3.5 Noise

While noise is not formally within the scope of this plan change, it is a necessary consequence of rural production activities. Noise does occur in rural areas, sometimes on an intermittent basis. Ensuring adequate setbacks of dwellings from horticultural properties is an important part of minimising the potential for reverse sensitivity complaints. HortNZ welcomes the intent outlined in the objectives that priorities the rural area for rural production and all that encompasses.

If noise is to be reviewed in rural context, it is important these things are provided for:

FROST PROTECTION DEVICE (FROST FANS)

A frost fan is essentially a steel tower with a rotating fan near the top. Frost fans are expensive pieces of equipment that growers invest in to provide a means of protecting their crops if frosts occur. Frost fans cost money to operate and need to be supervised while in operation. They are generally operated during the very early hours of the morning, and therefore growers certainly do not operate them unnecessarily. Growers need to be able to operate them if temperatures drop below the critical threshold for their crop.

AUDIBLE BIRD SCARER DEVICES

A bird scarer is a noise emitting device being used for the purpose of disturbing or scaring birds and can include a gas gun, avian distress alarm, or firearm when being used specifically for bird scaring. This is a necessary part of horticulture to protect the crop ready for harvest

as birds can destroy an entire crop if not managed. It is important to understand that audible bird scarers are used for a limited period of the year. They are not used year-round.

3.6 Biosecurity

The issue of biosecurity relates to the need for rapid response in the event of a biosecurity incursion of an unwanted organism. Vegetation removal, burial, burning and spraying of material are methods that may be used. It is therefore important that the plan adequately provides for these activities to be undertaken.

HortNZ seeks provisions to provide for the active management of pest plants and pest animals including those identified in the Regional Pest Management Plan and unwanted organisms under the Biosecurity Act 1993, including in SNA's and areas of indigenous vegetation.

Submission on Manawatu District Draft Plan Change A: Rural & Flood Channel Review

Without limiting the generality of the above, HortNZ seeks the following decisions on Plan Change A as set out below, or alternative amendments to address the substance of the concerns raised in this submission and any consequential amendments required to address the concerns raised in this submission.

Additions are indicated by bolded underline, and deletions by strikethrough text.

| Provision | Support/oppose | Reason | Decision sought |
|--|-----------------|--|---|
| Consequential changes | | | |
| Indigenous Vegetation and Significant Natural Areas [changes in general] | Support | Support reducing duplication with the provision of the One Plan. | |
| Removal of nodal areas [changes in general] | Support | | |
| <u>Definitions</u> | | | |
| Earthworks | Support | Support the list of exclusions provided but for consistency with the NPStnds, an alternative drafting approach would be to include these as permitted activities. HortNZ support the approach of not regulating rural earthworks volumes as this would create duplication. | Consider drafting the exclusions as part of permitted rules (for example added to 3D.4.1 with reference to the operative plan chapter reference). |
| Farming | Support in part | Consequential to the change sought below to the definition of 'Intensive | Amend to include greenhouses, as shown in tracked changes below: |

| | | | |
|--------------------------|---------|--|--|
| | | indoor farming’, HortNZ seek that growing produce in a greenhouse is part of the farming activities definition. | Farming includes: ... <u>g. growing produce in a greenhouse</u> |
| Farm buildings | Support | Provides an accurate description. | Retain |
| Highly productive land | Support | Reflects the direction in the NPSHPL | Retain. |
| Intensive indoor farming | Oppose | <p>The National Planning Standards (‘NPStnds’) define the term ‘intensive indoor primary production’.</p> <p>The proposed definition ‘intensive indoor farming’ mirrors the NPStnds definition above, <u>except</u> that it includes produce. This would capture horticultural greenhouses. The supporting documentation for the NPStnds indicate the excluding horticulture from the definition of ‘intensive indoor primary production’ was intentional.¹²</p> <p>HortNZ does not support the proposed definition because:</p> <ul style="list-style-type: none"> • Horticulture does not have the same type or scale of effects – in relation to odour or noise – as other activities listed in the definition. | <p>Amend to exclude produce, as shown in tracked changes below: means farming activities that principally occur within buildings and involve growing fungi, produce, or keeping or rearing livestock (excluding calf-rearing for a specified time period), dairy goats, pigs or poultry.</p> <p>OR</p> <p>Replace the definition of ‘intensive indoor farming’ with the NPStnds definition for ‘intensive indoor primary production’.</p> |

¹² <https://environment.govt.nz/assets/Publications/Files/2l-definitions-standard.pdf> (at page 136).

| | | | |
|----------------------------------|-----------------|--|--|
| | | <ul style="list-style-type: none"> The definition is inconsistent with the NPStnds, as this is considered an equivalent term with a different meaning. <p>This has implication for how glasshouses are considered as the provisions include a specific rule framework for intensive indoor and outdoor farming.</p> | |
| Land Based Primary Production | Support in part | <p>Reflects NPSHPL, however an additional component is added.</p> <p>For consistency with the NPSHPL, HortNZ prefers retaining the definition as it is in the NPSHPL. The additional words are, in our view, a clarification - this would be more appropriate as an advice note.</p> | <p>Amend to reflect the NPSHPL definition as shown in tracked changes below:</p> <p>means production, from agricultural, horticultural or forestry activities, that is reliant on the soil resource of the land; and excludes intensive indoor farming and intensive outdoor farming.</p> |
| Less Hazard Sensitive Activities | Support in part | <p>Generally, support the recognition that non-habitable buildings present a lower risk. Propose a minor amendment to include reference to structures in a rural context.</p> | <p>Amend to include reference to structures in a rural context, as shown in tracked changes below:</p> <p>means buildings for non habitable use such as garages, accessory buildings, farm buildings (excluding intensive farming), boarding, breeding and training kennels <u>and structures that support farming activities</u>. Also includes activities and structures at parks and reserves, and temporary activities</p> |

| | | | |
|--|------------------------|---|---|
| Rural industry | | <p>A particular consideration for horticulture operations which are rotational in nature is that the restriction of <i>'processing of farm produce grown or produced on the landholding'</i> within the definition of farming activities, (beyond which these become 'rural industry') is not necessarily practical in relation to the definition of landholding.</p> <p>HortNZ seek that a specific definition (and rule framework) be provided for post-harvest facilities/packhouses, recognising that these are a specific supporting activity required for horticulture.</p> | <p>In addition to/ as a subset of, include a new definition for post-harvest facilities (which encompasses packhouses):</p> <p><u>Post-harvest facility</u> means buildings used for storage, packaging, washing, inspecting and grading of produce from a range of locations, including pack-houses.</p> |
| Supporting activities | Support | As per the NPSHPL. | Retain |
| <u>Artificial Crop Protection Structure</u> <u>Crop Support Structure</u> | New definitions sought | <p>HortNZ seeks specific definitions for crop support and crop protection structures, to provide clarity within the provisions. These definitions are commonplace in a number of district plans, and in HortNZ's experience assist plan interpretation.</p> | <p>Include the following definitions:</p> <p><u>Artificial Crop Protection Structure</u> means structures with material used to protect crops and/or enhance growth (excluding greenhouses). Artificial crop protection structures are not buildings.</p> <p><u>Crop Support Structure</u> means an open structure on which plants are grown.</p> |
| General Rural Zone (GRUZ) Chapter | | | |

| | | | |
|---------|-----------------|---|---|
| GRUZ-O1 | Support | The definition of farming includes horticultural activities; it is appropriate that farming is the predominant land use in the rural zone. | Retain. |
| GRUZ-O2 | Support | This objective is consistent with the NPSHPL | Retain. |
| GRUZ-O3 | Support in part | Generally, support the intent of the objective, including the recognition that farming activities require supporting buildings. Horticulture in particular also requires structures (such as crop support structures for example) as part of 'normal operations', therefore minor suggestion sought to include this. | Minor amendment to refer to farming structures, as shown in tracked below: The character of the General Rural Zone is low overall building density, featuring a predominantly open farming landscape interspersed by farm buildings, <u>structures</u> and residential units |
| GRUZ-O4 | Support in part | It appears as though this objective is directed at non-farming activities; this could be clarified in the drafting (although inherent that farming would have an operational need). Support the recognition of potential reverse sensitivity effects. | Suggested amendment to clarify focus of the objective, as shown in tracked below: Only those <u>non-farming</u> activities that have an operational need to locate in the rural environment are allowed while avoiding impacts on established farming activities |
| GRUZ-P1 | Support | It is appropriate that farming activities are prioritised within the GRUZ. | Retain - with correction to spelling error (farm <u>ing</u> activities) |
| GRUZ-P2 | Support | This policy is consistent with the direction of the NPSHPL. | Retain. |

| | | | |
|---------|-----------------|--|--|
| GRUZ-P3 | Support | This objective is consistent with Policy 1 of the NPSHPL | Retain. |
| GRUZ-P4 | Support | The matters in GRUZ-P4.1 – P4.11 reflect many of the matters in clause 3.9(2) of the NPSHPL. | Retain. |
| GRUZ-P5 | Support | Reflects the direction in clause 3.9(3) of the NPSHPL. | Retain. |
| GRUZ-P6 | Support | More or less reflects clause 3.11 of the NPSHPL. | Retain (but consider clarifying drafting to be clear that this is in relation to non-land-based production activities?) |
| GRUZ-P7 | Support in part | <p>The drafting of P7.1 – P7.4 is not clear as to whether this is intended to be read as all needing to be met, or just one the criteria needs to be met to meet the policy intent. HortNZ consider that GRUZ-P7.3 should apply as a requirement to all non-farming activities.</p> <p>Support inclusion of a requirement to mitigate reverse sensitivity effects (although suggest amendment to include ‘avoid or’ – as where avoidance is possible this should be the priority).</p> | <p>Clarify the drafting so it is clear whether these operate as individual criteria or a cumulative list; and</p> <p>Amend GRUZ-P7.3: The activity avoids or mitigates any reverse sensitivity effects on rural production and associated residential units</p> |
| GRUZ-P8 | Support in part | Support inclusion of a policy to address conflict between incompatible activities, propose minor amendments to provide a broader range of responses (manage cf. minimise) for the purpose of | <p>Proposed amendment in tracked changes: Minimise <u>Manage</u> conflict between potentially incompatible activities to</p> |

| | | | |
|----------|-----------------|---|--|
| | | enabling farming operation to continue to operate. | enable <u>the operation of</u> farming activities. |
| GRUZ-R1 | Support | Support providing a permitted rule for farming and ancillary activities. | Retain. |
| GRUZ-R2 | Support | As a minor amendment, reference to structures could also be added. | Retain with amendment, in tracked changes below: GRUZ-R2 - Accessory Buildings and Farm Buildings <u>and structures</u> , including additions and alterations on land that is not highly productive land |
| GRUZ-R3 | Support | Support providing a permitted rule for land based primary production on HPL. | Retain |
| GRUZ-R4 | Support | Support providing a permitted rule for supporting activities and farm buildings on HPL. | Retain |
| GRUZ-R7 | Support | Support providing a permitted rule for shelterbelts (however seek amendment to the applicable standard, GRUZ-ST5 below). | Retain. |
| GRUZ-R14 | Support in part | As above, HortNZ seek specific provisions for post-harvest facilities (i.e., packhouses), where they are not within the definition of farming activity (which is limited to the landholding) so these can be enabled. | Amend to include a specific rule pathway for post-harvest facilities, separate to the broader category of rural industry, for operations which are not meeting the definition of farming activities (which are limited to produce grown on the landholding). |

| | | | |
|------------|-----------------|--|---|
| GRUZ-R17 | Support | Support the provision for structures and farm buildings. | Retain |
| GRUZ-ST1 | Support in part | The drafting of this standard could be clearer, as to what setbacks are intended to apply to which buildings (as both the accessory building type and the setback standard are drafted in the same sentence), for example a table would be clearer. | Amend to draft as a table, so the setbacks applicable to the type of accessory building are clear. |
| GRUZ-ST3.2 | Oppose in part | As a consequential change to HortNZ's feedback on the definition of 'intensive indoor farming' - which seeks that glasshouses are not included. | Delete GRUZ-ST3.2: Buildings housing horticulture – All buildings used in the production of horticulture must be set back 30m from all boundaries |
| GRUZ-ST5 | Oppose in part | A 10m setback from the property boundary is not considered necessary in an effects management sense in all cases and could lead to an inefficient use of land. The most likely effect - shading of a residential property - is managed by GRUZ-ST5.2). | Delete GRUZ-ST5.1: 10m from the boundary of any adjoining property that is not owned by the owner of the shelter belt |
| GRUZ-ST7 | Support in part | A 15m separation is proposed from all boundaries, whereas above farm buildings are required to be setback 20m. As the rural zone policy direction is to prioritise rural activities, it is considered that the residential setback should at least match the setback required of farm buildings. | Amend GRUZ-ST7.1: A minimum separation of 20 15m from all boundaries |

| | | | |
|-------------------------------------|-----------------|--|--|
| GRUZ-ST8 | Support in part | Propose that the boundary setback also apply to minor residential units. | Amend: <u>GRUZ.ST8.X A minimum separation of 20 from all boundaries</u> |
| GRUZ-ST11 | Support | Support providing a 20m height standard for the GRUZ. | Retain |
| GRUZ-ST28 | Support in part | Specific provision for ACPS and CSS is sought within an 8 - 12m distance, as is common in many District Plan frameworks is sought. | Retain with amendment: GRUZ-ST28.1 Be located a minimum of 12m from the outer visible edge of a National Grid support structure (tower), <u>except for artificial crop protection structures or crop support structures that are:</u> <ul style="list-style-type: none"> a. <u>Not more than 2.5 in height; and</u> b. <u>Located at least 8m from a National Grid support structure (pole); and</u> <u>Removable or temporary to allow for a clear working space of 12m from the pole for maintenance and repair purposes.</u> |
| Natural Hazards (NH) Chapter | | | |
| NH-P2 | Support | Generally support the policy focus on significant potential to be affected, with consideration of whether design can achieve avoidance or mitigation | Retain |

| | | | |
|------------------------------------|-----------------|--|---|
| NH-P3 | Support | Generally support the policy focus which enables less hazard sensitive activities (within some effects parameters) | Retain |
| NH-P4 | Support in part | This policy may not provide for specific situations (e.g. flood protection or mitigation) where flood waters are specifically designed to divert water onto an adjoining site, where appropriate in the context? | Consider amendment to enable situations where it may be appropriate to divert flood waters. |
| NH-R2.1 | Support | Support providing a permitted pathway for Less Hazard Sensitive Activities (subject to standard). | Retain |
| NH-R4 | Oppose in part | This rule is more onerous than Rule NH-R2.1 (for new Less Hazard Sensitive Activities), by including a 20m ² increase threshold, after which the activity is a discretionary activity (in the Flood Hazard Mitigation Overlay). The reason for this is unclear. | Amend: Where: the size of addition does not increase the building footprint by more than 20m². |
| Subdivision (SUB) Chapter U | | | |
| SUB-O16 | Support | Support protection of land in the GRUZ for productive purposes. | Retain |
| SUB-O17 | Support in part | HortNZ consider this objective would be strengthened by including reference to existing activities within the GRUZ, as subdivision is a key stage at which to | Amend, to include consideration of existing activities: Subdivision creates allotments and patterns of land development that are |

| | | | |
|---------|-----------------|--|--|
| | | consider reverse sensitivity. The current drafting has a landscape focus. | compatible with the objectives of the General Rural Zone, recognizing <u>existing activities and the</u> characteristics, features and natural areas of the rural environment. |
| SUB-P58 | Support | Support policy recognition of the need to restrict land fragmentation. | Retain |
| SUB-P59 | Support | The matters listed are consistent with clause 3.8 of the NPSHPL. | Retain |
| SUB-P60 | Support | The matters listed are (more or less) consistent with clause 3.8 of the NPSHPL. | Retain |
| SUB-P61 | Support in part | The matters listed are consistent with clause 3.10 of the NPSHPL; however whether they apply cumulatively (“and” list) is not clear. | Retain, with minor amendments to clarify the relationship between SUB-P61.1 – SUB-P61.5. |
| SUB-P62 | Support | The matters listed are consistent with clause 3.10 of the NPSHPL. | Retain |
| SUB-P63 | Support | The matters listed are consistent with clause 3.10 of the NPSHPL. | Retain |
| SUB-P69 | Support | Subdivision is a key step at which to manage potential reverse sensitivity issues. | Retain |

| | | | |
|--------------|----------------|--|--|
| SUB-P70 | Support | HortNZ support the ability to amalgamate parcels to improve productive capacity. | Retain |
| SUB-GRUZ-R3 | Support | This aligns with the direction in the NPSHPL. | Retain |
| SUB-GRUZ-R4 | Oppose in part | It is proposed that the matters of discretion be amended to enable consideration of reverse sensitivity effects. | Amend to include an additional matter of discretion: <u>SUB-GRUZMDX Management of potential reserve sensitivity effects</u> |
| SUB-GRUZ ST1 | Support | Support the requirement in SUB-GRUZ-ST1.3 for building platforms to comply with rural zone performance standards (which includes boundary setbacks). | Retain SUB-GRUZ-ST1.3 |