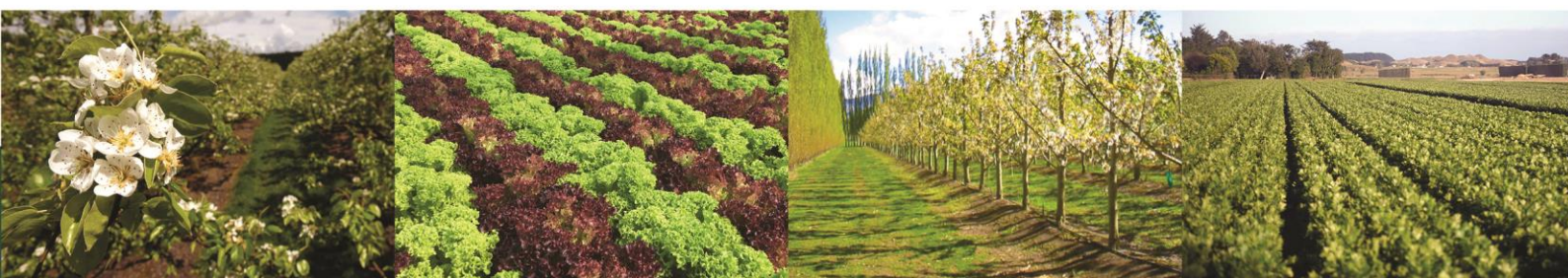


# **SUBMISSION ON THE PUKEKOHE-PAERATA STRUCTURE PLAN**

10 October 2018

**TO:** Auckland Unitary Council

**NAME OF SUBMITTER:** Horticulture New Zealand



## **CONTACT FOR SERVICE:**

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## Introduction

Horticulture New Zealand (HortNZ) thanks Auckland Council for the opportunity to submit on the proposed Pukekohe-Paerat Structure Plan and welcomes any opportunity to work with Auckland 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 from Council are set out below.

## Background to HortNZ

HortNZ was established on 1 December 2005, combining the New Zealand Vegetable and Potato Growers' and New Zealand Fruitgrowers' and New Zealand Berryfruit Growers Federations.

HortNZ represents the interests of 5000 commercial fruit and vegetable growers in New Zealand, who grow around 100 different crop types and employ over 60,000 workers. Land under horticultural crop cultivation in New Zealand is calculated to be approximately 120,000 hectares.

The horticulture industry value is \$5.7 billion and is broken down as follows:

<b>Industry value</b>	<b>\$5.7bn</b>
Fruit exports	\$2.82bn
Vegetable exports	\$0.62bn
<b>Total exports</b>	<b>\$3.44bn</b>
Fruit domestic	\$0.97bn
Vegetable domestic	\$1.27bn
<b>Total domestic</b>	<b>\$2.24bn</b>

For the first time New Zealand's total horticultural produce exports in 2017

exceeded \$3.44bn Free On Board value, 83% higher than a decade before.

It should also be acknowledged that it is not just the economic benefits associated with horticultural production that are important. The rural economy supports rural communities and rural production defines much of the rural landscape. Food production values provide a platform for long term sustainability of communities, through the provision of food security.

HortNZ's mission is to create an enduring environment where growers prosper. This is done through enabling, promoting and advocating for growers in New Zealand to achieve the industry goal (a \$10 billion industry by 2020).

## 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.

The principles that HortNZ considers in assessing the implementation of the RMA include:

- The effects based purpose of the RMA;
- Non-regulatory methods should be employed by councils;
- Regulation should impact fairly on the whole community, make sense in practice, and be developed in full consultation with those affected by it;
- Early consultation of land users in plan preparation;
- Ensuring that RMA plans work in the growers interests both in an environmental and sustainable economic production sense.

## PART 1 - GENERAL COMMENTS

### Food Security

Population growth not only increases demand on housing supply, it also generates and necessitates an increased demand on food supply. There is a general assumption that New Zealand is the land of plenty and we will always have enough locally-grown food to feed our population, supplemented by imported food where there is demand.

But things are changing fast. Prime fruit and vegetable growing land is being squeezed by rapid growth. Increasing urbanisation places additional pressure on, and competition for, the natural resources and infrastructure also critical for growing fruit and vegetables.

Current projections around New Zealand's expected population increase and annual food volumes available for consumption in New Zealand show that domestic vegetable supply will not be able to sustain our future population consumption needs.<sup>1</sup> When supply is short and demand high, prices are subject to wide variations. This can make healthy food unaffordable for many New Zealanders and often hits vulnerable communities the hardest.

Already many New Zealanders, are struggling to meet the recommended daily intake of 3 plus vegetables and 2 plus fruit a day. In 2016/2017, only 38.8 percent of New Zealand adults and 49.8 percent of children met the recommended daily fruit and vegetable intake.<sup>2</sup> Those living in the most deprived neighbourhoods were less likely to meet the recommended intakes and were more likely to be obese.<sup>3</sup> A 2008/2009 study showed that Maori females were significantly less likely to meet the required intake than non-Maori females.<sup>4</sup>

### The Pukekohe Hub

HortNZ recently commissioned an analysis of the horticultural sector in Pukekohe, one of New Zealand's most prominent growing areas. The purpose of the analysis was to understand the social, environmental and economic values, and constraints, provided and faced by, the local industry.

The case study area was the 'Pukekohe hub', which includes the southern area of Franklin in the Auckland Region and the northern portion of Waikato District.

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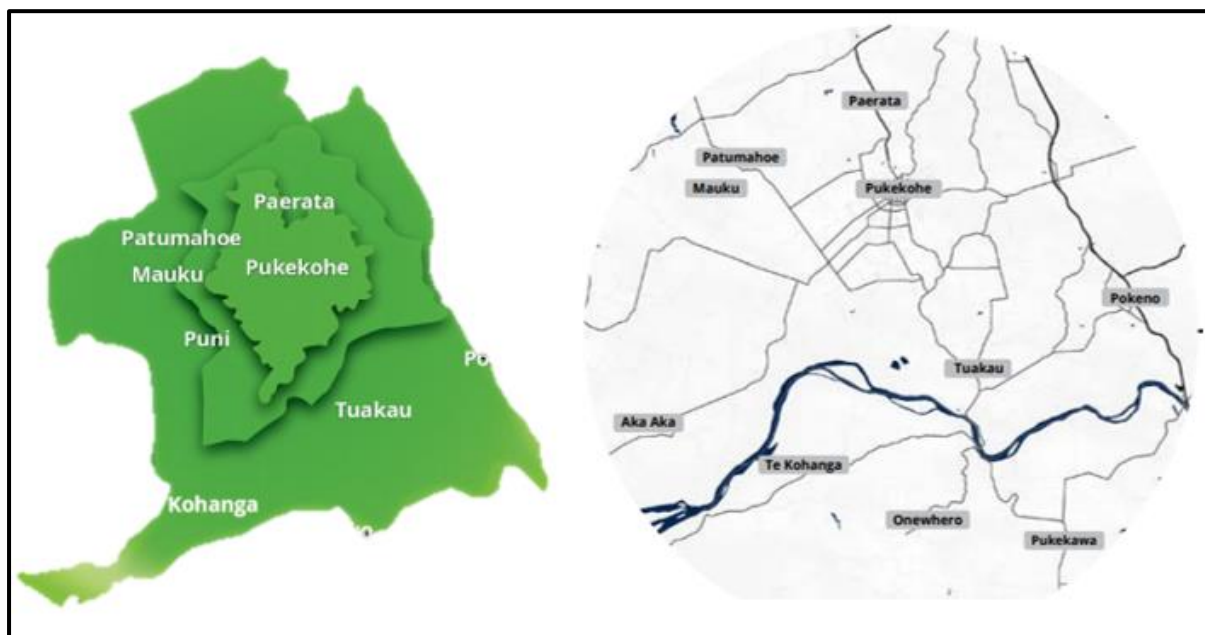
<sup>1</sup> Horticulture New Zealand. (2017). *New Zealand domestic vegetable production: the growing story*. <http://www.hortnz.co.nz/assets/Media-Release-Photos/HortNZ-Report-Final-A4-Single-Pages.pdf>

<sup>2</sup> Ministry of Health. (2017). Annual Data Explorer 2016/17: *New Zealand Health Survey*: <https://minhealthnz.shinyapps.io/nz-health-survey-2016-17-annual-data-explorer/ w e9a07e83/ w aa03fb73/ w 320818d4/ w 26fa6ce8/ w f50ad45f/ w dbba0f02/#!/explore-indicators>.

<sup>3</sup> Ibid.

<sup>4</sup> Ministry of Health. (2012). *A focus on Maori Nutrition: Findings from the 2008/09 New Zealand Adult Nutritional Survey*. Wellington: Ministry of Health.

Figure 1 – The Pukekohe Hub<sup>5</sup>



Key findings of the report show that:

- With an area of 4,359ha, the hub is only 3.8% of New Zealand's total fruit and vegetable growing area. But contributes to 26% of the value earned from national production of vegetables and some fruit.
- 90% of the produce grown in the hub is for the domestic market.
- The hub contributes significant to the vitality of local communities through social contributions to community groups and cultural diversity.
- The hub contributes \$261million to GDP and employs 3,090 full time equivalents.
- Between 2002 – 2016 there has been a 30% reduction in vegetable cropping land across New Zealand.

Failure to adequately provide for continued operation and on-going development of horticulture, will impact the ability to meet future demand for fresh fruit and vegetables. In the next 25 years, the analysis predicted:

- a reduction in production of fruit and vegetables of between 46% - 55%
- price increases between 43% - 58%
- Up to 4,500 job losses
- An economic loss between \$850 million and \$1.1 billion.

<sup>5</sup> *New Zealand's Food Story. The Pukekohe Hub.* Deloitte. 2018. <http://www.hortnz.co.nz/assets/Deloitte/New-Zealands-food-story-The-Pukekohe-hub.pdf>

## PART 2 - SUBMISSION

### 1. The revised 2018 Vision:

HortNZ supports the reviewed vision. The direction is clear that the intention of future development is to enhance Pukekohe and support the surrounding rural economy. As demonstrated in the Deloitte report, and outlined above, Pukekohe plays a significant part in New Zealand's domestic food supply and also generates a range of social and economic benefits to the local community.

A number of factors contribute to Pukekohe's versatile rural productivity. These include high class soils, the frost-free climate, topography, access to labour, markets and key transport links.

It is essential that future rural growth is considered alongside urban growth to maximise the benefits of the Pukekohe Hub and ensure on-going operation and development of the horticultural industry.

### 2. Residential Zones:

HortNZ supports the higher density residential zones being located in the northern section of the Structure Plan area. The rural land adjoining these higher density areas (labelled A, B, C and D) are predominately in pasture and less suitable for cropping.

The approach of locating high density residential zones closer to the town centre, or existing developed areas is also supported.

HortNZ generally opposes the rezoning of horticultural land for urban development in areas H and I.

The rezoning of this land contributes to the loss of high class soils and has essentially sterilised the productivity of the remaining high class soil to the east which is locked in by development. The issues of reverse sensitivity are discussed further below.

However, noting that this Structure Plan is not looking to move development locations, HortNZ supports the lower density, or Single House Zone in area I. A lower density will enable greater yard setbacks and buffer strips between residential development and existing horticultural activities. This will assist in managing reverse sensitivity effects on existing horticulture. Issues of reverse sensitivity are discussed further below.

### 3. Business zones:

HortNZ supports the intention for light industry in areas H and E. This zoning is likely to be more compatible with horticulture than heavy industry, or those businesses that attract high visitation from retailers or consumers. However, there is still the potential for reverse sensitivity to occur and the potential for adverse effects on horticulture activities.

The Auckland Unitary Plan description of the light industrial zone does not provide great clarity on the type of activities that might occur there. The activities are the same between heavy and light industry, except that light industry activities apparently do not generate objectionable odour, dust or noise. In contrast to this, the light industry zone description also notes that activities sensitive to air quality are not generally provided for.

Horticulture can be air sensitive to some activities. Ash and smoke could potentially damage crops. Many light industry activities may also be heavy water users and may require discharge permits for wastewater. Horticulture requires a reliable water resource for crop survival and to manage nutrients.

Water quality is essential for crop health and for human health and safety. Should the horticulture water source be polluted by industrial activities, there is a serious risk for human consumption.

Furthermore, activities such as drive-through restaurants and café's may result in reverse sensitivity effects from legitimate horticulture activities such as spraying. These are provided for as Permitted Activities in the Light Industrial Zone.

#### 4. Additional comment – Reverse sensitivity in the Operative Auckland Unitary Plan:

It is acknowledged that the Auckland Unitary Plan contains good foundations and the intention to manage reverse sensitivity. However, HortNZ purports that the operative provisions are not sufficient to adequately manage the new rural-urban interface.

The objectives and policies of the Rural Zones provide strong direction around protecting soils and rural production activities from adverse effects of subdivision, use and development, including reverse sensitivity.

However, the Unitary Plan is distinctly lacking in a framework to support those areas where urban development immediately adjoins Rural Zoned land. This is a fundamental flaw given the anticipated expansion of the rural-urban boundary to accommodate future urban growth.

##### Pukekohe Hill Precinct

An example is the Pukekohe Hill Precinct which contains the following provisions to address reverse sensitivity to the rural environment:

- Policy I433.3 (9) which encourages the use of road as a buffer between urban and rural land uses.
- Assessment criterion I433.8.2 (4) requiring consideration of the extent to which a proposal addresses reverse sensitivity in respect of the rural land surrounding the precinct and particularly where land adjoins the Rural – Rural Production Zone.

The Precinct includes provisions relating to density, site area, stormwater and building colour. The underlying zone rules apply for all other matters.

It is logical that a road is not appropriate in every instance, however the Plan does not provide an alternative solution for managing the rural-urban interface. Because the underlying zone rules apply, a 1m yard setback is permitted along the adjoining rural boundary. This is not an appropriate distance to adequately minimise or avoid the potential for reverse sensitivity effects from spray, noise and odour.

Subdivision applications seeking a reduced density are Discretionary Activities. Therefore, an assessment of reverse sensitivity effects under Criterion I433.8.2 is not required. There are no other objectives or policies within that Precinct to guide consent planners on the importance of considering reverse sensitivity in relation to rural zoned land.

While the objectives and policies of the underlying zone apply, in this instance, the Residential – Single House Zone does not provide any direction on reverse sensitivity within the objectives and policies.

In the case of the Pukekohe Hill Precinct, the result has been the development of a number of high density residential sites, with habitable buildings located 1m from land zoned rural production. The location of these residential buildings in such close proximity results in additional effort and cost for the grower to meet spray notification requirements and the potential for an increase in complaints from urban communities regarding spray, noise and odour effects associated with legitimate farming activities.

The provision of 2m high fences or hedges (which has occurred) is not sufficient to manage the rural-urban interface. Most shelterbelts are closer to 10m in height and the primary function of a shelterbelt is protect crops from wind, not as means to avoid reverse sensitivity from residential development setback only 1m.

It is the same for other urban zones in the Auckland Unitary Plan, including residential and industrial/business zones. The planning framework within these sections does not account for instances where these urban zones immediately adjoin rural zones.

Residential Single House and Mixed Suburban Zones

Both the Single House Zone and Mixed Suburban Zone have the same yard requirements. There is no differentiation of yard requirements where land adjoins other zones:

Yard	Minimum depth
Front	3m
Side	1m
Rear	1m

In both zones, buildings that do not meet the yard standards are restricted discretionary activities with discretion restricted to:

- The effect on the rural and coastal character of the zone
- The effects on the amenity of neighbouring sites.

There is no clear direction to consider potential reverse sensitivity effects of new residential development adjoining rural zones. The objectives and policies of both residential zones are silent on the matter.

Light Industry Zone

The objectives and policies of the Light Industry zone consider the impacts of reverse sensitivity on adjoining residential zones. However, the framework is silent on reverse sensitivity with adjoining rural zones.

The purpose of the yard controls (H17.6.4) specifically highlights the need for a buffer between industrial and neighbouring residential or open space zones. H17.6.4 (2) and (3) provide landscaping requirements for the yard setbacks to ensure adverse effects are adequately managed.

**H17.6.4. Yards**

Purpose:

- provide a buffer and screening between industrial activities and neighbouring residential zones and open space zones, to mitigate adverse visual and nuisance effects; and
- ensure buildings are adequately set back from lakes, streams and the coastal edge to maintain water quality, amenity, provide protection from natural hazards, and potential access to the coast.

- (2) Front yards (excluding access points) must be planted with a mixture of trees, shrubs or ground cover plants (including grass) within and along the full extent of the yard.
- (3) Side and rear yards must be planted with a mixture of trees, shrubs or ground cover plants (including grass) within and along the full extent of the yard to provide a densely planted visual buffer for a depth of at least 3m and must be appropriately maintained thereafter.

### Chapter E38: Subdivision

The planning framework for subdivision is also silent on the management of the new rural-urban interface. There is no direction in the objectives and policies, or the rules, to address reverse sensitivity at the time of subdivision.

## **5. Mechanisms to manage reverse sensitivity:**

Examples of how other councils have addressed reverse sensitivity in this way are outlined in **Attachment A** of this submission.

It is evident that to effectively manage reverse sensitivity and the rural-urban interface, there needs to be strong direction throughout the whole planning framework. The intent must be clear in objectives and policies. This is then supported in the rules, with assessment criteria specifically addressing reverse sensitivity.

As seen in Attachment A, this can be done by requiring yard setbacks where urban zones are adjacent to rural zones. It is not uncommon for different yard requirements depending on the adjoining zone.

It is acknowledged that the yard examples in Attachment A are unlikely to be suitable for the density sought in the Single House and Mixed Suburban Zones. However, it is plausible that the following setbacks could be achieved:

- 7m in the Single House Zone (on boundaries adjoining the Rural Production Zone)
- 5m in the Mixed Suburban Zone (on boundaries adjoining the Rural Production Zone)
- 10m in the Light Industry zone (on boundaries adjoining the Rural Production Zone).

A minimum of 5m would be required for the setback to be effective.

Buildings that do not meet the yard standards could be restricted discretionary activities with discretion restricted to:

- the effects on rural character and amenity
- the potential for reverse sensitivity effects on rural production.

Another way in which reverse sensitivity could be addressed is through the requirement of a buffer strip at the time of subdivision. This would be an effective means of avoiding and mitigating potential reverse sensitivity effects. The buffer strip rule could include landscaping requirements similar to those provided in H17.6.4 (2) and (3). If a buffer strip is applied at the time of subdivision, then reduced yard setbacks could be applied to land use development.



## Decision sought:

### **Action A.**

Insert new objectives and policies in the Single House, Mixed Housing Suburban and Light Industry zones which seek to avoid or mitigate reverse sensitivity effects on rural production activities and land zoned rural production.

**Or**

Create precincts at the time of implementing the Pukekohe-Paerata Structure Plan to insert new objectives and policies in the Single House, Mixed Housing Suburban and Light Industry zones which seek to avoid or mitigate reverse sensitivity effects on rural production activities and land zoned rural production.

**AND**

### **Action B.**

Insert new rules in the Single House, Mixed Housing Suburban and Light Industry zones for yard setbacks where development adjoins the Rural Production zone.

**And** insert new rules in Chapter E38: Subdivision requiring a buffer strip along boundaries adjoining Rural Production, at the time of subdivision. To apply in the Single House, Mixed Housing Suburban and Light Industry zones.

**Or**

Create precincts at the time of implementing the Pukekohe-Paerata Structure Plan to insert new yard requirements to areas identified as D2, E, G, H and I.

**And** insert new rules for these precincts requiring a buffer strip along boundaries adjoining Rural Production, at the time of subdivision. To apply to areas identified as D2, E, G, H and I.

#### Recommended yard requirement standard:

Permitted activities:

- 7m in the Single House Zone (on boundaries adjoining the Rural Production Zone)
- 5m in the Mixed Suburban Zone (on boundaries adjoining the Rural Production Zone)
- 10m in the Light Industry zone (on boundaries adjoining the Rural Production Zone).

Buildings that do not meet the yard standards could be restricted discretionary activities with discretion restricted to:

- the effects on rural character and amenity
- the potential for reverse sensitivity effects on rural production.

#### Recommended buffer strip standard to apply to Single House, Mixed Suburban and Light Industry Zones:

- (1) 30m buffer strip along boundaries adjoining the Rural Production Zone;
- (2) Must be planted with a mixture of trees, shrubs and ground cover plants (including grass) within and along the full extent of the yard;
- (3) In the case of Light Industry, the extent to which water conservation measures and, where appropriate, low impact stormwater design and facilities have been applied.

## ATTACHMENT A – REVERSE SENSITIVITY ANALYSIS

### Reverse sensitivity

A suite of provisions are sought in district plans to manage potential reverse sensitivity:

- Definition of reverse sensitivity
- Identification of issue
- Objective to address issue
- Policies
- Methods – including rules and setbacks
- Assessment criteria where a resource consent is required.

Reference should also be made to RPS as a number include direction on reverse sensitivity – eg Northland, Otago, BOP

The following district plans have significant setbacks for dwellings in rural areas.

Tasman and Hastings also have requirements where rural residential is adjacent to a rural zone. In particular, Hastings includes requirements where residential is adjacent to a rural zone.

	<b>Setback from boundary for dwellings in rural zone</b>	<b>Setback between dwellings on separate lot</b>	<b>Setback in other zones adjacent to rural</b>
<b>Whakatane Rural</b>	25m from boundary	None	
<b>Western BOP</b>	30m		
<b>Tasman</b>	30m		30m from Rural Residential to rural zones
<b>Hurunui</b>	25m for sensitive activities	100m	
<b>Central Otago</b>	25m	50m in rural residential	
<b>Hastings</b>	15m residential on Plains Lifestyle		30m From Proposed New Urban Development Areas to Rural Zones

### Examples of provisions

#### 1) Whakatane District Plan

##### **Strategic objectives**

***The adverse effects of incompatible use and development on the environment are avoided, remedied or mitigated.***

- To ensure that where the adverse effects of activities cannot be avoided, remedied or mitigated, those activities are separated from other activities.

- To discourage activities locating where they are sensitive to the effects of, or may compromise the continued operation of, lawfully established activities.
- To enable primary productive use in the Rural Plains Zone and to protect land in that zone from further subdivision, development and activities that could detract from its primary production focus.
- To ensure that subdivision, use and development of rural areas does not compromise the efficient operation of rural production activities or result in reverse sensitivity effects on lawfully established activities.

## Rural Zones

### *To sustain the productive potential of rural land and provide for rural production activities.*

- To protect land in the Rural Plains Zone, which includes versatile land, for primary productive use and to maintain the productive land resources for future generations.
- To provide for the growth and efficient operation of primary productive use and rural production activities in the Rural Zones.
- To ensure that land use activities that are sensitive to the effects of rural activities such as horticulture, **farming**, production forestry and **mining** (including the processing of **minerals**) do not constrain the operation of these rural activities including through the use of physical separation requirements.
- To avoid activities locating in the rural environment where they may compromise the development and operation of existing and consented activities.

### Assessment matter:

the proposed method of addressing any potential or actual reverse sensitivity effects that may arise as a result of the activity;

### Reverse Sensitivity

3.7.41.1 **Council** shall have regard to;

- a. the sensitivity of the proposed activity to any lawfully existing activities including customary activities;
- b. the Criteria in 3.7.1;
- c. the noise environment of the locality;
- d. the location of proposed **dwelling**s on the site in relation to existing lawfully established activities where there is a potential for reverse sensitivity effects (e.g. where the existing activity may generate noise, odour, dust, vibration, traffic);
- e. the impact on existing activities' provision for risk management, including;
  - i. emergency procedures and plans in the events of a fire or accidental release of **hazardous substances**;
  - ii. separation of the location of the use, management and disposal of **hazardous substances** from sensitive activities (for example, residential or community activities);

and

- iii. potential to compromise existing buffer areas for the purpose of mitigating risks to the environment, (including human health and safety) associated with the spray irrigation or disposal of wastewater or solid waste as identified in 20.2.1;
- f. the Criteria in 3.7.27 (Versatile land use for non-rural purposes);
- g. the Criteria in 3.7.28 (Amenity values and Rural and Urban Character Effects); and
- h. the compatibility with the existing character and pattern of land development within 300m of the site

## 2) Tasman District Assessment criteria

Where a proposed building location cannot comply with the 30m setback rule due to the shape of the site, the potential to mitigate the effects from any reduced setbacks for habitable buildings through measures such as building location, orientation, design, fencing or screening, and clustering of residential activities

## 3) Central Otago

### Policy - Effects of Rural Activities

To recognise that some rural activities, particularly those of a short duration or seasonal nature, often generate noise and other effects that can disturb neighbours by ensuring that new developments locating near such activities recognise and accept the prevailing environmental characteristics associated with production and other activities found in the Rural Resource Area.

### Explanation

With the recent trend towards country living, traditional agriculture, mining, horticulture, viticulture, utilities and energy generation and transmission activities may be subject to an increasing number of complaints in respect of the effects of their day to day activities. The effects of these activities often cannot be readily avoided, remedied or mitigated by the person undertaking the activity without causing significant adverse economic effects. If people choose to live in the rural area of the Central Otago District, they should be prepared to accept the inconveniences, discomforts, disturbances or irritation that are caused and will be caused by such operations as a normal and necessary aspect of living in a district with strong rural character and a healthy developing agricultural/horticultural/viticultural sector and utility and energy generation/transmission activities.

Although such inconveniences, discomforts, disturbances or irritations may not be acceptable in an urban area, they are to be expected in rural areas. It is therefore considered appropriate that those activities that locate adjacent to an existing rural activity should take steps to mitigate the effects that the existing rural activity may have upon them.

## 4) Hastings

### Policy Plains Zone

Activities locating in the Plains Zone will need to accept existing amenity levels associated with well-established land use management practices involved with the sustainable use of the soil resource.

### Explanation

The District Plan acknowledges the potential for new activities to experience adverse effects from activities that are already lawfully established. The Performance Standards for the Plains Zone have been developed at a level that facilitates the ongoing operation of rural activities, carried out in the area. In meeting this policy, the Council will issue Land Information Memorandum which state that the zone contains a high level of agricultural, horticultural and viticultural activity. Accordingly residents living in the area will need to recognise the accepted management practices of these activities including agrichemical spraying, the use of farm machinery, the seasonal operation of bird scarers, odour, and night harvesting which may occur within the limits set out for the zone by the District Plan.

### ***Conflict can often arise between Rural Residential activities and other activities on adjoining land in the Rural and Plains Zones.***

Generally, Rural Residential activities tend to be attracted to areas within the wider rural and plains areas of the Hastings District which are desirable because of the activities already established there, and the character and aesthetic values which those activities contribute to the area. For example, Rural Residential development is often attracted to areas where there are established vineyards. While many Rural Residential activities are carried out in conjunction with a range of other activities which are identical to those carried out in adjoining zones, albeit on a smaller scale, there is still potential for conflict to occur between Rural Residential activities and adjoining activities in the Rural and Plains Zones, where the effects of the activities are not compatible. These can include, for example, activities creating traffic movement and the generation of odours and dust and the effects of the use of agricultural sprays, or noise from farm machinery and bird scaring devices used by adjoining activities in the Rural and Plains Zones. Alternatively, Rural Residential activities may adversely affect adjoining activities by restricting their operations through complaints, or through their associated practices, such as the planting of trees, the use of agrichemical sprays, or the provision of havens for pests.

Rural Residential activities may need to accept a level of environmental standards that reflect the range of activities and management practices associated with horticultural, viticultural, agricultural and other activities carried out in the adjacent Plains and Rural Zones.

### Policy

To provide a buffer between rural and rural residential activities to mitigate the adverse effects of these activities both within the Rural Residential Zone and at the zone interfaces.

### Method

30m setback from rural boundaries

### Residential Zone

#### Policy

Potentially incompatible activities such as residential activities and productive rural uses will be separated through interface buffering or special yard requirements which minimise nuisance or conflicts.

#### Method for proposed new urban development areas

30m setback from rural boundary or a minimum of 10m from a road which provides the boundary between a residential and rural zone.

#### Outcome sought

An open space buffer will be provided which maintains on-site and neighbourhood amenity.

### **5) Western Bay of Plenty**

#### Issue

Rural farming practices, including horticulture, can have effects which may influence the well-being of people living in close proximity to and who may be unfamiliar with the operational requirements of primary production which have effects which are to be anticipated and expected in the Rural Zone. These practices include spray drift, the use of agrichemicals, noise from frost fans, shading from shelterbelts, pumping of water for irrigation, bird scarers, general use of farm machinery both on and off farm, the harvesting of crops which may occur at various times including at night, the weekend and public holidays. These practices have the potential to create noise, dust and odour either of a temporary or intermittent nature beyond the boundary or the property concerned. These are legitimate farming practises which may nevertheless experience reverse sensitivity effects. Because these practices are an accepted and integral part of primary production they should not be unreasonably constrained by other activities.

#### Objective

Primary productive activities should be able to operate in the Rural Zone without unreasonable constraints being imposed on them by other activities.

#### Policy

Activities with a functional or other legitimate need for a rural location should not be established in rural areas unless they are able to be undertaken without constraining the lawful operation of productive rural land uses which are carried out in accordance with accepted management practices.