

# SUBMISSION ON

# Proposed Combined Wairarapa District Plan

20 December 2022

**To:** Carterton District Council, Masterton District Council, South  
Wairarapa District Council

**Name of Submitter:** Horticulture New Zealand

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# OVERVIEW

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## Our submission

Horticulture New Zealand (HortNZ) thanks the Carterton, Masterton and South Wairarapa District Council's for the opportunity to submit on the draft Combined Wairarapa District Plan. We thank the councils for providing additional time to submit these comment.

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

As this is a Draft plan process HortNZ would welcome the opportunity to continue to work with your Councils and to discuss our submission, specifically the areas where changes are sought.

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 5,500 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 is 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.

# Submission

## 1. Horticulture in the Wairarapa

There are a small number of horticultural growers located in the Wairarapa. Operations tend to be focused on soil production of fresh vegetables and fruits. The majority of operations are focused around Masterton and Greytown areas.

Although there is a comparatively small number of growers compared with other areas of New Zealand, there is a reasonable degree in diversity in the crops grown in the Wairarapa area including pipfruit, summerfruit, leafy greens, brassicas, peas, buttercup squash and pumpkins.

While horticulture may not currently be the dominant primary industry, looking towards the future there is potential for the horticulture to increase in the Wairarapa.

## 2. Draft Combined Wairarapa District Plan

HortNZ would encourage the combined plan to consider impacts of policies on potential future horticultural development and recognise that there is potential for growth in the horticultural industry in Wairarapa. HortNZ believes the enabling position the draft plan takes towards viticulture can be extended to horticulture. There are established summerfruit and pipfruit orchards in the Wairarapa. There are many similarities between the requirements for horticultural crops such as pipfruit and summerfruit orchards, as viticulture and often these are found in similar regions<sup>1</sup>.

### 2.1. Strategic Direction

It is important that primary production is sufficiently recognised and provided for in the strategic direction. The strategic direction seeks that primary production is recognised and protected. HortNZ seeks a specific strategic direction for rural industry as it is part of the rural environment. We support the inclusion of specific strategic direction for the protection of highly productive land from inappropriate development.

### 2.2. Future-proofing the District Plan to enable horticulture growth

It is important the district plan is future-proofed so that it is fit-for-purpose and responsive to change over its approximately ten-year life (under the current RMA review timeframes) - notwithstanding the RMA reforms. The review of the rural provisions of the district plan is occurring in a dynamic space of change -

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<sup>1</sup> Central Otago, Hawkes Bay, Tasman and Marlborough all have presence of viticulture, pipfruit and summer fruit due to similar climatic and soil needs of crops.

including freshwater regulations, climate change mitigation and adaptation and national policy context in terms of matters such as highly productive land, biodiversity and urban development. This highlights the importance of future-proofing the availability of resources to supply the district's growing population.

## **2.3 General Zoning Approach**

HortNZ supports the intent of the General Rural Zone (GRUZ) and believe some of the objectives, policies and rules provided for viticulture could be extended to include horticulture. In other areas of New Zealand, it is usual to find horticultural systems, such as summerfruit and pipfruit orchards, alongside viticulture. In some areas approaches to providing for viticulture and horticulture are considered together<sup>2</sup>.

HortNZ supports use of setbacks to manage reverse sensitivity issues. The proposed setback of 10m is not considered sufficient to address potential reverse sensitivity issues so a setback for 30m is sought. A setback of 30m is also sought from residential activities in the Rural Lifestyle zone to the boundary of the General Rural Zone so that there is a setback from primary production activities.

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**

Since the Draft Combined Wairarapa District Plan was notified, the National Policy Statement for Highly Productive Land (NPSHPL) has been gazetted. Therefore it is anticipated that the Proposed Plan will include provisions to give effect to the NPSHPL, even with the transitional definition applying until Greater Wellington have undertaken mapping and incorporated into the Regional Policy Statement.

Some changes are sought through this submission but recognise that there needs to be an integrated approach to incorporating provisions for highly productive land, particularly in regard to subdivision and rural lifestyle development.

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

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<sup>2</sup> Central Otago District Council conducts regular horticulture and viticulture surveys to plan for these activities [Labour Survey Infographic Poster.pdf \(codc.govt.nz\)](#)

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 that HPL is 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.

The proposed plan does not include a definition for HPL, HortNZ suggests including a definition for HPL to align with the NPSHPL and to strengthen protections for HPL throughout the plan.

While HortNZ supports this definition there needs to be consideration in the plan to allow for buildings that support primary production on HPL. Below are some examples of horticultural support buildings or activities that need to be considered:

- 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 that need to be located near horticultural production areas for processing of produce. These are not on-site facilities. For example, an independent packhouse that facilitates the washing, preparation, packing and distribution of produce in behalf of growers. Time is a critical factor for quality and processing of fresh produce. As soon as produce is harvested the count down 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. In order to support the overall productivity of HPL, it may be desirable if new enterprises relocate on other land, however by locational need this is not always the best outcome to support a production system.
- The NPS HPL also raises the question of where activities such as non-soil based greenhouse production be appropriately located. Ideally, non-soil based greenhouse production sites need to be located near established horticultural areas, near distribution and transport networks, horticultural support services and infrastructure such as

packhouses and near larger population areas. As with other types of horticultural production, these 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.

What is important in our view, is 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 with regards to 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 being located near urban centres and/or the land they operate on being subject to 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.

## **3. Providing for horticultural activities in the rural environment**

### **3.1 Seasonal Worker Accommodation**

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. Accommodating seasonal workers in appropriate accommodation near their places of employment is more efficient for the horticulture industry, than accommodation that will need to be found further afield and workers will be required to commute.

The district plan will provide a planning framework for the community for at least the next decade and therefore a definition of seasonal worker accommodation should be included in the plan and should be provided for within the GRUZ. Several district plans have taken the approach of providing for such facilities based

on a concept of shared kitchen and ablution facilities and separate sleeping quarters. This type of facility is cost efficient and adequately provides for seasonal accommodation.

### **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 Standard<sup>3</sup>:

*"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 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 in the GRUZ.

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<sup>3</sup> <https://environment.govt.nz/publications/2i-definitions-standard-recommendations-on-submissions-report-for-the-first-set-of-national-planning-standards/>



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

### **3.3 Shelterbelts**

Shelterbelts are part of primary production activities and assist in realising productive potential. They are an important mechanism 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 there is barrier between the primary productive activity and adjoining properties.

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

### **3.4 Earthworks**

The industry requires several supporting activities and infrastructure to enable ongoing operation and development. HortNZ seeks an approach to provide for ancillary rural earthworks. There is a need to provide for 'day-to-day' activities that are integral to productive land use in the rural zone.

Ancillary rural earthworks is the disturbance of soil, earth or substrate land surfaces ancillary to primary production that includes:

- Land preparation and cultivation (including establishment of sediment and erosion control measures), for planting and growing operations and harvesting of agricultural and horticultural crops (farming)
- Burying of material infected by unwanted organisms as declared by Ministry for Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993
- Irrigation and land drainage
- Maintenance and construction of facilities, devices and structures typically associated with farming activities including but not limited to farm tracks, driveways and unsealed parking areas, stock races, silage pits, farm drains, farm effluent ponds, and feeding lots, fencing, crop protection and sediment control measures.

HortNZ has developed a Code of Practice for Erosion and Sediment Control to provide guidance at an industry level for cultivation of vegetables crops (Horticulture New Zealand Code of Practice 'Erosion and Sediment Control Guidelines for Vegetable Production' (June 2014<sup>4</sup>). We also note that Farm Environment Plans also assist in managing day-to-day activity and are requirements at a regional level in some catchments and coming through at a national level - this lessens the need for regulation at a district plan level.

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<sup>4</sup> <https://www.hortnz.co.nz/assets/Compliance/Erosion-and-Sediment-Control-Guidelines-for-vegetable-production-v1.1.pdf>

### 3.5 Noise

Rural environments are working rural production areas and should not be portrayed as quiet. Noise does occur in those 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.

In setting rural noise standards the following factors should be incorporated:

- Rural activities in rural areas should not be subject to urban standards for noise as it will curtail rural productivity
- Daytime noise controls should be effective seven days per week - not limited to Monday to Friday as primary production activities are not limited Monday to Saturday
- Noise standards in rural zones should be at least 55 LAeq to ensure that any assessment against the permitted baseline represents the normal rural environment
- An exemption from the noise standards should be provided activities that are part of the primary production activity - an example is provided below.
- Specific rules should be included for activities that generate noise such as frost fans and audible bird scaring devices.

#### **Exemption from noise standards**

Subject to best practicable option being adopted the following activities are exempt from complying with noise standards:

Rural production activities, including agricultural and horticultural vehicles and equipment; aircraft used for agricultural and horticultural purposes; and portable equipment (excluding portable sawmills and frost protection fans and audible bird scaring devices) associated with agricultural and horticultural activities such as: spraying, harvesting,

In the draft plan, frost protection devices and audible bird scaring devices are a permitted activity if they meet noise requirements and operate within certain times. HortNZ supports that approach but seeks some amendments to the provisions.

#### 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.

HortNZ seeks that provisions are included for noise insulation in new residential units that are located within 300m of an existing frost protection device to avoid potential for reverse sensitivity effects.

#### 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.

Generally the provisions in the bird scarers standard are supported except for a limitation on the number of devices as the key issue is the sound level emitted.

### **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.

### **3.7 Schedules**

The Plan has schedules for:

- Outstanding natural features and landscapes - Schedule 7
- Outstanding natural character - Schedule 9
- Significant natural areas - Schedule 5
- Significant waterbodies - Schedule 11
- Areas of very high and high natural character - Schedule 10
- Special amenity landscapes - Schedule 8

HortNZ is consulting with growers about areas identified in schedules to ensure that growers properties are not adversely affected or how the provisions may affect operations.

## Summary

In particular, HortNZ seek the following outcomes:

- Definitions and rules that recognise the importance of primary production
  - Reverse sensitivity
  - Ancillary rural earthworks
  - Seasonal worker accommodation
  - Artificial crop protection and crop protection structures
- Provisions that recognise highly productive land to give effect to the National Policy Statement Highly Productive Land
- Strategic direction that provides for primary production and which is not compromised by other activities
- Provisions for activities and buildings/structures that are an inherent part of horticulture
- Appropriate setbacks for dwellings, buildings and artificial crop protection structures from boundaries
- Inclusion of provisions for biosecurity and management of unwanted organisms under the Biosecurity Act 1993.

## Submission Table for the Combined Wairarapa Plan

Without limiting the generality of the above, HortNZ seeks the following decisions on the proposed plan, 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.

Provision	Support/oppose	Reason	Decision sought
<b>Definitions</b>			
Definition of Earthworks	Support in part	HortNZ supports the use of the National Planning Standards definition of earthworks but seek that the plan includes a definition and activity for ancillary rural earthworks to provide for day to day earthworks for primary production. The definition also include the burial of material infected by unwanted organisms under the Biosecurity Act 1993.	Add a definition for ancillary rural earthworks and provide for the activity in GRUZ-R5: Ancillary rural earthworks is the disturbance of soil, earth or substrate land surfaces ancillary to primary production that includes: <ul style="list-style-type: none"> <li>• Land preparation and cultivation (including establishment of sediment and erosion control measures), for planting and growing operations and harvesting of agricultural and horticultural crops (farming)</li> <li>• Burying of material infected by unwanted organisms as declared by Ministry for Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993</li> <li>• Irrigation and land drainage</li> <li>• Maintenance and construction of facilities, devices and structures typically associated with</li> </ul>

			farming activities including but not limited to farm tracks, driveways and unsealed parking areas, stock races, silage pits, farm drains, farm effluent ponds, and feeding lots, fencing, crop protection and sediment control measures.
Intensive farming	Oppose	The plan should use the National Planning Standards definition for intensive indoor primary production	Delete definition of intensive farming and replace with: Intensive indoor primary production means Primary production activities that principally occur within buildings and involve growing fungi, or keeping or rearing livestock (excluding calf rearing for a specified time period) or poultry.
Less hazard sensitive activities	Oppose in part	Accessory buildings used for non-habitable purposes are a very low hazard risk and should not even be considered as a less hazard sensitive activity.	Delete Accessory buildings used for non-habitable purposes from definition of less hazard sensitive activities.
National Grid Yard	Oppose in part	The diagram is not showing centreline from poles as 10m. In addition HortNZ seeks that the setback distance from the outer edge or a pole or pi-pole is 10m, not 12m.	Amend diagram of National Grid Yard to clearly show distance from centreline of line on poles to be 10m. Amend to add: The area located 10m in any direction from the outer edge of a National Grid pole or pi-pole. Amend c) the area located 12 metres in any direction from the outer edge of a National Grid tower.
Noxious or offensive industry	Oppose in part	HortNZ opposes inclusion of fuel burning equipment as a noxious or	Deleted e) fuel burning equipment from definition of noxious or offensive industry.

		offensive industry. Such operations will require consents under the regional plan for discharges to air and are best managed through that process. The effects will depend on the location and so a blanket classification is not supported.	
Pest plant species	Support in part	The ECO-1 schedule is limited to plants identified in the Wellington Regional Pest Management Strategy. There should also be recognition in the Plan that unwanted organisms are pests but not identified in the strategy as they are unknown plants and organisms.	Amend definition of pest plant species to: Means any plant species identified in Appendix ECO-1 Schedule of pest plant species and unwanted organisms identified under the Biosecurity 1993 by Ministry of Primary Industries..
Potentially contaminated land	Oppose	The definition does not relate to a specific HAIL list so could change over time. In addition it is very broad and should only include sites which are known to have had an activity undertaken on them.	Amend definition of potentially contaminated land by deleting 'or is more likely than not to have been'
Potentially hazard sensitive activities	Oppose	Buildings associated with primary production should not be classed as potentially sensitive to natural hazards as they are not habitable buildings.  The Building Code has Building Importance categories and non-habitable buildings are importance level 1 as they are buildings which pose low	Delete a) Buildings associated with primary production from definition of potentially hazard sensitive activities

		risk to human life or the environment, or a low economic cost.	
Residual risk	Support	HortNZ supports the definition of residual risk and how it will be applied in the Hazardous substances chapter.	Retain definition of residual risk.
Residential visitor accommodation	Oppose in part	Visitor accommodation should be short term stay. Ninety days is not short term. Such a length of stay should be regarded as a residential activity.  The National Planning Standards definition of visitor accommodation should apply. Any limitation on the length of stay should be in the relevant rules.	Delete the definition of residential visitor accommodation.
Reverse sensitivity	Support	HortNZ supports the definition of reverse sensitivity. There is no definition of 'lawfully established. It should be clear that an activity is lawfully established if it is permitted in a plan or by resource consent or an existing use right or a national environmental standard.	Amend definition of reverse sensitivity to: Means the vulnerability of an <del>existing</del> lawfully established activity to other activities in the vicinity which are sensitive to adverse environmental effects that may be generated by such <del>existing</del> activity, thereby creating the potential for the operation of such <del>existing</del> <u>lawfully established</u> activity to be constrained'  Include a definition for lawfully established: means activities provided for by one of the following: 1. permitted through a rule in a plan, or 2. a resource consent, or 3. a national environmental standard; or



			4. by an existing use right (as provided for in Section 10 of the RMA)
Rural produce retail	Support in part	HortNZ supports the definition of rural produce retail but notes that it is limited to rural produce grown on 'site'. Site is defined and is usually a certificate of title. However a growers operation could include a number of 'sites' but still be part of the same operation. It would be better to limit the produce grown by the operation or on sites managed by the operation.	Amend definition of rural produce retail: Means the use of land and/or buildings on or within which, rural produce grown or produced by the operation, and products manufactured from it, are offered for sale.
Sensitive activities	Support in part	The definition of sensitive activities includes a range of activities and facilities. However the term is uses in relation to the National Grid. The NPSET has a much narrower definition of sensitive activities - schools, residential buildings and hospitals. It is inappropriate to apply the wider definition to the National Grid yard activities.	Either include a specific definition for sensitive activities in the National Grid Yard or amend references to sensitive activities in National Grid Yard provisions.
Significant hazardous facility	Oppose in part	The definition of significant hazardous facility has a number of exclusions which are supported. However c) is limited to 'land based primary production activities'.  There is no definition for 'land based primary production activities' in the Plan	Amend definition of significant hazardous facility Exclusion c) by deleting 'land-based' from primary production.

		and the exclusion should apply to all primary production activities.	
Shelterbelts and small woodlots	Support	Provision for shelterbelts is important for horticulture	Retain the definition for shelterbelt.
Special amenity landscapes	Oppose	HortNZ does not support inclusion of special amenity landscapes.	Delete definition and SCHED8.
Surface water body	Oppose	The definition of waterbody in the RMA does not include artificial channels or water races. The definition should be consistent with the Act.	Delete water races and artificial channels from the definition of surface water body.
Highly productive land	New definition	The plan should refer to highly productive land. The NPSHPL describes HPL and provides for an interim definition until such time as mapping has been undertaken by the regional council.	Include a new definition for highly productive land: <u>Until the regional policy statement contains maps identifying highly productive land in the Combined Wairarapa Plan districts, highly productive land is:</u>  <u>LUC 1, 2, or 3 land which is zoned general rural or rural production and is not identified for future urban development.</u>
New definition - Artificial crop protection structures		HortNZ seeks provisions for artificial crop protection structures. A definition should be included for artificial crop protection structures	Insert new definition as follows:  Artificial crop protection structure means structures with material used to protect crops and/or enhance growth (excluding greenhouses).

			For clarity an artificial crop protection structure is not a building.
New definition - Crop support structures	Support	A definition should be included for crop support structures	Insert new definition as follows:  Crop Support Structure: means an open structure on which plants are grown
Strategic Directions RE-Rural Environment	Oppose in part	The strategic directions for RE Rural Environment us undefined terms such as rural environment and rural areas. It is not clear of these terms equate to the 'rural zones' in the planning maps. Often areas of open space are included when the term 'the rural area' is used. It needs to be clear that the terms rural environment and rural areas only apply to the land zoned General Rural or Rural Lifestyle Zone	Include new definitions: Rural environment means land zoned General Rural or Rural Lifestyle.  Rural area means land zoned General Rural or Rural Lifestyle.
Strategic Directions RE-Rural Environment RE-O2	Support in part	Providing for Highly productive land should be included in the strategic objective for the rural environment.	Amend RE-O2 Rural land remains available primary production activities and productive potential <u>and highly productive land</u> is protected.
Strategic Directions RE-Rural Environment	New	There should be provision of a strategic direction for activities that may seek to locate in the rural zones - such as rural industry.	Insert new RE-O5 Activities in rural zones The rural areas include activities that support primary production activities such as rural industry.

Strategic Direction UFD - Urban Form and Development UFD-O6 Commercial activities	Support in part	The Strategic Direction seeks that commercial activities located outside of town centres do not undermine the function and viability of the Wairarapa town centres. It should also be clear that commercial activities outside of town centres are not appropriate in rural areas where primary production is undertaken.	Amend UFD-O6 Commercial activities Commercial activities located outside of town centres do not undermine the function and viability of the Wairarapa town centres or primary production in the rural zones.
Network Utilities Introduction	Support in part	The 5 <sup>th</sup> paragraph describes that land uses adjacent to network utilities can have an adverse effect on the function of network utilities. This implies that they do have an adverse effect. Many land uses do not have such effects. It would be better for the wording to indicate that there may be the potential for adverse effects.	Amend NU Introduction Para 5: <i>Likewise, incompatible land uses adjacent to network utilities may have the potential to have an adverse effect on the ongoing function and operation of network utilities.</i>
NU-O3	Oppose in part	HortNZ does not support a 'protection of network utilities but rather that activities are managed to ensure that incompatible activities do not adversely affect network utilities.	Amend NU-O3: Incompatible subdivision, use and development are managed, including reverse sensitivity effects, to ensure the safe function and operation of network utilities
NU-O4 National Grid	Oppose in part	Policy 10 of the NPSET seeks that 'to the extent reasonably possible' activities are managed to avoid reverse sensitivity effects and to ensure that the network is not compromised. It is not an absolute avoid. NU-O4 should reflect the intent of the NPSET.	Amend NU-O4: Subdivision, use and development in managed, to the extent reasonably possible, to avoid reverse sensitivity effects on the national Grid and ensure that the operation, maintenance, repair, upgrading

			and development of the national Grid is not compromised.
NU-P6 National Grid	Oppose in part	<p>The policy relies on the definition of sensitive activities, which is broader than the definition of sensitive activities in the NPSET.</p> <p>NU-P6 should not be an absolute avoid.</p> <p>The wording 'near' the National Grid is imprecise. Given that both the National Grid Yard and National Grid corridor are defined the policy should be specific</p>	<p>Amend NU-P6 to align with definition of sensitive activities in the NPSET or include a separate definition of sensitive activities in the National Grid Yard.</p> <p>Manage subdivision, use and development in the National Grid Yard to:</p> <ol style="list-style-type: none"> <li>1. Generally not provide for residential buildings, schools and hospitals in the National Grid Yard</li> <li>2. ensure that the safe and efficient operation, maintenance, repair, upgrading, removal and development of the National Grid is not compromised in</li> <li>3. To the extent reasonably possible avoid incompatible activities that could lead to reverse sensitivity effects.</li> </ol>
NU-R3 Upgrading of existing above ground network utilities	Support in part	<p>There is not condition about replacement conductors to be the same voltage. Where a higher voltage conductor is installed the clearance distances under NZECP34:2001 increase and can adversely affect landowners over whose land the line crosses. Therefore the same voltage should be used for a permitted activity.</p>	<p>Amend NU-R3 1 a) to include:</p> <p>viii) replacement conductors are the same voltage</p>

NU-R16	Support	HortNZ supports a matter of discretion that considers that adverse effects of the network utility on existing land uses.	Retain NU-R16 Matter of discretion 4.
NU-R19 National Grid Yard	Support in part	The rule should state the sensitive activities to which it applies. HortNZ has sought that 'intensive farming' be replaced with 'intensive indoor primary production'. Produce packing is not defined so is unclear as to scale of activity. NU-R19 c is supported.	Amend NU-R19: a) The activity is not a residential activity, school or hospital b) iii) amend 'intensive farming' to 'intensive indoor primary production' and delete 'produce packing facilities.'
NU-R20 Land disturbance in the National Grid Yard	Oppose in part	The default activity status should be restricted discretionary as the activities are matter that can be managed through conditions. RDA is the activity status in many district plans where permitted activity standards cannot be met.	Amend NU-R20 2) to Restricted discretionary
Hazards and risks	New provisions	A biosecurity incursion of unwanted organisms is a hazard and risk that should be managed. The pea weevil incursion is a case in point which had significant effects on the community.  While biosecurity incursions of unwanted organisms are managed by MPI there are actions that may need to be taken which should be provided for in the district plan. Such actions include	Include following provisions Issue Biosecurity risks to primary production activities are significant and could have serious impact on both urban and rural communities, particularly the production of food. There needs to be active management to ensure that threats do not enter the country and if they do that pest incursions are able to be addressed

		<p>the burial of infected material or removal and destruction of vegetation, including indigenous vegetation if it is infected. Therefore HortNZ seeks provisions in the Plan that provide for such activities to be undertaken as permitted given the necessity to act rapidly in a response. The Biosecurity Act 1993 does not give MPI the ability to override the RMA, except when the Minister declares an emergency - and that has never occurred in NZ.</p>	<p><b>Objective</b> Take an integrated management approach to biosecurity risks to ensure that rural production is not adversely affected by incursions of pests and unwanted organisms</p> <p><b>Policy</b> Enable disposal of infected material for biosecurity purposes and treatment of areas to manage incursions of unwanted organisms.</p> <p><b>Rules</b> Include rules enabling disposal or management of material infected by unwanted organisms as declared by MPI Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993 is a permitted activity.</p> <p>Relevant chapters for rules are: ECO and GRUZ</p> <p>Include definition of ancillary rural earthworks as sought and inclusion in GRUZ-R5.</p>
CL- Contaminated Land	Support in part	<p>HortNZ supports reliance on the NESCS but seek that it is clear that the NES does not apply to production land where production activities are being continued.</p>	<p>Add to CL-Rules; Special provisions apply to use of production land so that the NESCS does not apply to the continued use of the land as production land.</p>

HAZ- Hazardous substances	Support	HortNZ supports the approach in the Hazardous substances section.	Retain HAZ- Hazardous substances.
NH-Natural Hazards	Oppose in part	<p>HortNZ has sought that the definition of potentially sensitive activities is amended by deletion of buildings associated with primary production. It is considered that the risk is not at the same level of commercial and industrial activities as such buildings are not in built up areas.</p> <p>The policy framework for potentially hazard sensitive activities (NH-P3, NH-P4) is inappropriate for buildings associated with primary production.</p>	Delete buildings associated with primary production from potentially hazard sensitive activities.
NH-Natural Hazards NH-O1	Support in part	HortNZ supports an objective where the hazard risk is not increased but consider that the policy framework is more restrictive than currently so actually seeks to reduce risk rather than 'not increase.	<p>Amend NH-O1</p> <p>The risk and potential harm arising from natural hazards on people, property, infrastructure and the environment are not increased.</p>
NH-R3 Any potentially hazard sensitive activated and associated buildings within moderated hazard areas and low hazard areas	Oppose in part	There should be provisions for buildings for primary production activities where the risk is low due to density and likely presence of people.	<p>Amend NH-R3 by adding new line for General Rural Zone</p> <p>Activity status - Permitted</p> <p>Where:</p> <p>a)The building is not a habitable building</p> <p>b)The building does not impede stormwater overland flowpaths</p>



NH-R5 Earthworks within flood hazard areas	Support in part	There should be provision for earthworks for normal rural production activities in the General Rural Zone within flood hazard areas as long as they do not increase flood risk	Amend NH-R5 by adding to 1: b) ancillary rural earthworks where the earthworks do not increase flood risk by obstructing overland flow paths.
SASM Sites and areas of significance to Maori	Oppose in part	The plan indicates that councils are working with iwi to identify sites and areas of significance to Maori. HortNZ is concerned that sites identified on private land should not be restricted through rules in the Plan unless there has been specific engagement and agreement with the landowners.	Ensure that sites on private land are not identified for protection.
ECO- Ecosystems and indigenous biodiversity ECO-O1	Oppose in part	The objective uses the term biological diversity which is not defined. The RMA uses significant indigenous vegetation and significant habitats of indigenous fauna. These are the appropriate terms that should be used. The objectives could be combined.	Amend ECO-O1 Maintain or enhance significant indigenous vegetation and significant habitats of indigenous fauna within the Wairarapa and protect from inappropriate subdivision use and development. Delete ECO-O2
ECO-P5	Oppose in part	There should be provision for maintenance of existing primary production activities to continue	Amend ECO-P5 7. maintenance of existing primary production activities
ECO-P7	Oppose in part	Where landowners have planted indigenous vegetation they should be able to appropriately manage such vegetation. Otherwise there is a perverse outcome of discouraging	Amend ECO-P7 By adding. 9. the indigenous vegetation has been specifically planted

		planting of indigenous vegetation - eg for shelterbelts or amenity planting.	
ECO-R1	Support in part	There needs to be recognition of the need to remove material infected by unwanted organisms under the Biosecurity Act 1993.	Amend ECO-R1 a) vii) required to remove vegetation infected by an unwanted organism under the Biosecurity Act 1993.
ECO-R2	Support in part	There needs to be recognition of the need to remove material infected by unwanted organisms under the Biosecurity Act 1993.	Amend ECO-R2 j) required to remove vegetation infected by an unwanted organism under the Biosecurity Act 1993.
NATC Natural Character NATC-O1	Support	An objective to preserve the natural character of rivers, lakes and wetlands and their margins is consistent with s6a) of the RMA.	Retain NATC-O1
NATC-P1	Oppose	The policy uses the term 'surface waterbodies' which is defined to include 'river, lakes, stream, pond, water race, artificial channel or wetland'. This is inconsistent with the objective which focuses on rivers, lakes, wetlands and their margins.	Amend NATC-P1 by replacing 'surface waterbodies' with rivers, lakes or wetlands'
NATC-P2	Oppose	NATC-P2 is dependent on the definition of waterbody which includes aquifers. It is not possible to enhance the margin of an aquifer. The policy should refer to rivers, lakes, wetlands and their margins.	Amend NATC-P2 by replacing waterbodies with rivers, lakes, wetlands and their margins.

NATC-P3	Support in part	NATC-P3 provides for earthworks for infrastructure within 25m of a significant waterbody. The definition of infrastructure includes a water supply system including irrigation so it should be clear that such uses are provided for.	Amend NATC-P3 by adding:  And for water supply distribution systems, including irrigation.
NATC-P5	Oppose in part	The policy uses the term 'surface waterbodies' which is defined to include 'river, lakes, stream, pond, water race, artificial channel or wetland'. This is inconsistent with the objective which focuses on rivers, lakes, wetlands and their margins. It is important that pump sheds can be located adjacent to rivers.	Amend NATC-P5 by replacing surface waterbodies with rivers, lakes, wetlands and their margins.
NATC-P6	Support in part	Modification of vegetation should also include removal of material infected by unwanted organisms under the Biosecurity Act 1993.	Amend NATC-P6: Add after pest species - 'or material infected by unwanted organisms under the Biosecurity Act 1993'
NATC-R1	Support in part	Provision should be made for all infrastructure including infrastructure for water supply distribution and irrigation.	Amend NATC-R1 by adding: a) iv) water supply distribution, including irrigation
NATC-R2	Support in part	Modification of vegetation should also include removal of material infected by unwanted organisms under the Biosecurity Act 1993.	Amend NATC-R2: Add c) removal of material infected by unwanted organisms under the Biosecurity Act 1993.
NFL- Natural Features and Landscapes	Oppose	HortNZ does not support inclusion of special amenity landscapes.	Delete NFL-O2

NFL-O2			
NFL-P2	Oppose	HortNZ does not support inclusion of special amenity landscapes. The criteria in NFL-P1 related to ONL's so are not appropriate for other landscapes.	Delete NFL-P2
NFL-P3	Support in part	There needs to be provision for primary production activities to continue within an ONL or ONF	Amend NFL-P3 by adding: 2g) enables primary production activities to operate
NFL-P5	Support in part	There needs to be provision for primary production activities to continue within an ONL or ONF	Amend NFL-P5 by adding: Allow subdivision, use or development within and outstanding Natural Features and Landscapes where it is associated with conservation activities <i>or primary production activities</i> :
NFL-R1	Oppose in part	There needs to be provision for primary production activities to continue within an ONL or ONF	Amend NFL-R1 by adding: 1 b) Earthworks, modification of indigenous vegetation or buildings and structures are associated with conservation activities <i>or primary production activities</i> :
NFL-S1 Earthworks	Oppose in part	Provision should be made for ancillary rural earthworks which are normal for primary production activities	Insert a definition for ancillary rural earthworks as sought above.  Amend NFL-S1 exemption to apply to ancillary rural earthworks
NFL-S2 Modification of indigenous vegetation	Oppose in part	Modification of vegetation should also include removal of material infected by	Amend NFL-S2

		unwanted organisms under the Biosecurity Act 1993 and removal of weeds and pests	Add removal of material infected by unwanted organisms under the Biosecurity Act 1993 and weed and pests to the exclusions.
NFL-S3 Buildings and structures	Oppose in part	Buildings and structures for primary production activities should be provided for.	Amend NFL-S3 to include an exemption for buildings and structures for primary production activities.
SUB-Subdivision	Support in part	The National Policy Statement for Highly Productive land (NPSHPL) came into force on 17 October 2022 and needs to be incorporated into the subdivision provisions to avoid subdivision of HPL	Include provisions to give effect to the NPSHPL and avoid subdivision of highly productive land, except as provided for in the NPSHPL.
SUB-P5 Rural character and amenity values of subdivision in the General Rural Zone	Support in part	Reverse sensitivity effects are included in SUB-P5 but it should be that 'the potential' for reverse sensitivity effects are avoided remedied or mitigated. The rural character is a subset of amenity values so there does not need to be specific inclusion of 'amenity values'	Amend SUB-P5 h) Potential for reverse sensitivity effects are avoided remedied or mitigated.  Delete 'amenity values'
SUB-P6 Avoid inappropriate subdivision in the General Rural Zone	Support in part	SUB-P6 should include that subdivision on highly productive land is avoided.	Amend SUB-P6 to include: Subdivision of highly productive land is avoided.
SUB-R2 Subdivision of land to create additional allotments	Support in part	Management of potential reverse sensitivity effects as a matter of control is supported.	Retain SUB-R2 Rural Zones matters of control 15.

LIGHT - Light	Oppose in part	There should be explicit recognition that light is important for health and safety. Compromising on use of light could lead to compromised health and safety.	Include a new objective: LIGHT-O3 To enable use of artificial light to protect people's health and safety
LIGHT-P3	Oppose in part	The focus of the policy is on amenity values of light but this needs to be balanced by the need for light for people's health and safety.	Delete LIGHT-P3 and include the following: Effects of artificial light are compatible with the receiving zone. Manage activities that generate artificial light in accordance with the background receiving environment of the zone, recognising that artificial light is necessary for the health and safety of people.
LIGHT-S1	Oppose	The standard sets a maximum lux value regardless of the zone, time of day or distance from residential activities. This is not effects based. For the Rural Zone the distance should be the notional boundary of a dwelling - not the site boundary. The intent is not to provide an amenity to sheep or trees.	Delete LIGHT-S1 and include an effects based standard based on zones and provide for lighting required for people's health and safety.
NOISE- Noise	Oppose in part	The Noise provisions use the term 'noise sensitive activities' but it is not a defined term. Sensitive activities are defined but it is not clear that they are all noise sensitive activities or if there are other activities that are sensitive to noise.	Clarify what are noise sensitive activities.
NOISE-O1 Noise generation	Oppose in part	The objective combines three concepts and so becomes somewhat muddled.	Amend NOISE-O1 to three objectives:

			<p>O1 The benefits of activities that generate noise are recognised and provided for.</p> <p>O1a) Noise should be compatible with the character and purpose of the relevant zone.</p> <p>O1b) Excessive noise does not cause adverse effects on the public health, safety and wellbeing of people and communities.</p>
NOISE-O2 Reverse sensitivity	Support	NOISE-O2 is supported.	Retain NOISE-O2 but clarify definition of noise sensitive activities.
NOISE-P1 Enable noise-generating activities in appropriate areas	Support in part	The policy should clearly link to the zone in which the activity is occurring.	<p>Amend NOISE -P1</p> <p>1) maintain the predominant character of the zone in which the activity is occurring by controlling the types of activities and levels of noise permitted in each zone</p>
NOISE-Rules	Support in part	HortNZ supports the list of activities which are provided for in the Plan. It should be clear that use of helicopters and aircraft for primary production activities are included in d).	<p>Amend Rules d)</p> <p>By adding aircraft for primary production purposes.</p>
NOISE-R1	Support in part	<p>The rule provides for emission of noise not otherwise provided for in this chapter.</p> <p>It should be clear that the emission of noise from exempted activities are provided for in the chapter.</p>	Amend NOISE-R1 Emission of noise (not otherwise provided for or exempted from this chapter).
NOISE-R4 Bird scaring devices	Support	Provision for audible bird scaring devices is supported.	Retain NOISE-R4

NOISE-R5 Frost protection devices	Support	<p>Provision of a permitted activity for frost protection devices is supported, subject to changes in NOISE-S2.</p> <p>In particular HortNZ seeks that there is requirement for noise insulation for residential activities locating within 300m of a frost protection device to ensure that potential reverse sensitivity effects are avoided.</p>	Retain NOISE-R5.
NOISE-R8 Helicopter landing areas	Oppose in part	<p>Helicopter landing areas is not defined. It should be clear that NOISE-R8 does not apply to helicopter landing areas for primary production activities. The provisions in NOISE-R8 would mean that all helicopters for primary production would require resource consent.</p>	Include exemption in NOISE-Rules for aircraft for primary production activities.
NOISE-New rule		<p>A new rule is sought for new residential activities within 300m of an existing frost protection device.</p>	<p>Include new rule:  NOISE-R16 Residential activities within 300m of a frost protection device  General Rural Zone  1. Activity status Permitted  Where:  a) Compliance is achieved with NOISE-S4.</p> <p>2. Activity Status Restricted Discretionary  Where compliance is not achieved with NOISE-R16(1)  Matters of discretion</p>



			<ol style="list-style-type: none"> <li>1. Ability to meet internal noise standards</li> <li>2. Potential reverse sensitivity effects</li> <li>3. Mitigation methods</li> </ol>
NOISE-S2 Bird scaring devices	Support in part	<p>Bird scaring devices are used just before sunrise and until just after sunset.</p> <p>The plan sets a noise limit to be achieved and then seeks to impose a limitation on the number of devices. The important threshold to meet is the noise level - regardless of the number of devices. Noise may be limited by contours and location so the threshold is the main criteria for managing potential adverse effects.</p>	<p>Amend Bird scaring devices 2) to ½ hour before sunrise and ½ hour after sunset.</p> <p>Delete 2 d)</p>
NOISE-S2 Frost protection devices	Support in part	The proposed rule for frost protection fans is consistent with other rules in district plans.	Retain NOISE-S2 but add provisions for noise insulation as sought below.
NOISE-S4 noise insulation standards for noise sensitive activities in specified areas	New	HortNZ seeks that addition of provision for noise insulation for residential activity within 300m of a frost protection device.	<p>Add to NOISE-S4 Residential activity within 300m of a frost protection device</p> <p>Any new residential activity locating within 300m of an existing frost fan on a separate site in different ownership must be designed and constructed to ensure that the noise level inside any bedroom will not exceed 30bD LAeq when windows are closed and frost protection devices are operating.</p> <p>Written certification of such compliance from an appropriately qualified and experienced acoustic</p>

			engineer shall be submitted with the building consent application for residential activity.
SIGNS -P1 Official signs and official traffic signs	Support	It is important that signs for health and safety are provided for in the plan.	Retain SIGN-P1
GRUZ - General Rural Zone		The provisions in the GRUZ chapter will need to be amended to give effect to the NPSHPL.	Give effect to the NPSHPL in the GRUZ chapter by including an objective, policies and rules.
GRUZ-O1 Purpose of General Rural Zone	Support	The purpose is consistent with the description in the National Planning Standards.	Retain GRUZ-O1
GRUZ-O2 Rural character and amenity	Support in part	<p>Rural character is a subset of amenity so there does not need to be specific reference to amenity values in GRUZ-O2.</p> <p>Areas of the General Rural Zone may be sparsely developed landscapes but there are other areas which have closer development and use for primary production.</p>	<p>Amend GRUZ-O2 Rural character</p> <p>The predominant character of the General Rural Zone is maintained, which includes:</p> <ol style="list-style-type: none"> <li>1. Areas of viticulture, horticulture, crops, pasture, forestry (indigenous and plantation) and the presence of large number of farmed animals;</li> <li>2. Generally well-spaced landscape but includes areas with closer development;</li> <li>3. Buildings associated with primary production activities including indoor primary production and rural community activities</li> <li>4. A range of noises, smells, light overspill and traffic, often on a cyclic and seasonal basis associated with primary production activities;</li> </ol>

			<ul style="list-style-type: none"> <li>5. Rural industry facilities, quarrying and cleanfill areas;</li> <li>6. Presence of rural infrastructure including rural roads and a lack of urban infrastructure such as street lighting and footpaths.</li> </ul>
GRUZ-O3 Provision for primary production	Support	The objective is supported but should use the term 'primary production' which is defined rather than 'rural production'.	Amend GRUZ-O3 by replacing 'rural production' with 'primary production'.
GRUZ-O4 Enable compatible activities	Support in part	Activities that are not primary production should be 'provided for' rather than enabled as there needs to be certainty that they can meet standards to not adversely affect primary production.	Amend GRUZ-O4 Enable primary production activities and provide for activities that have a functional need or operational need to locate within the General Rural Zone where they are not incompatible with primary production activities.
GRUZ-O4 Reverse sensitivity	Oppose in part	Sensitive activities shouldn't locate in the General Rural Zone unless there is a functional need for them to locate - such as rural schools. Where they do locate in the zone they should avoid potential for reverse sensitivity effects.	Amend GRUZ-O5: Potential for reverse sensitivity effects on primary production activities is avoided by ensuring that sensitive activities do not inappropriately locate in the General Rural Zone, and if they have a functional need to locate in the zone that potential reverse sensitivity effects are mitigated.
GRUZ-O6 Rural lifestyle	Oppose in part	Rural lifestyle should be directed to the Rural Lifestyle Zone consistent with the directions in the National Planning Standards. In particular rural lifestyle is to be avoided on highly productive land.	Amend GRUZ-O6 Rural lifestyle Rural lifestyle development avoids fragmentation of productive land and reverse sensitivity effects on primary production activities.

		<p>There is no specific policy for rural lifestyle and HortNZ seeks that it has a specific policy so the direction is clear.</p> <p>The second part of the objective is a policy not objective.</p>	<p>Include new GRUZ-PX Rural lifestyle</p> <ol style="list-style-type: none"> <li>1. Rural lifestyle subdivision and development is directed to the Rural Lifestyle zones</li> <li>2. Rural lifestyle is avoided on highly productive land</li> </ol>
GRUZ-P1 Appropriate activities	Oppose in part	<p>The purpose of the General Rural Zone is predominantly for primary production activities. There should not be a limitation of compatibility for primary production activities- that is the purpose of the zone.</p> <p>Rural lifestyle directions are set in GRUZ-O6 and HortNZ does not support rural lifestyle scattered through the General Rural Zone.</p>	<p>Amend GRUZ-P1:</p> <ol style="list-style-type: none"> <li>1. Enable primary production activities and associated ancillary activities</li> <li>2. Provide for other activities that have a functional need or operational need to be located in the General Rural Zone where they are compatible with primary production activities and the character of the General Rural Zone</li> <li>3. Provide for rural lifestyle development in rural lifestyle zones</li> </ol>
GRUZ-P2 Inappropriate activities	Support	Incompatible activities should be avoided	Retain GRUZ-P2
GRUZ-P3 Rural character and amenity values	Support in part	The character and purpose of the General Rural Zone are described in the objectives so do not need to be repeated in the policy.	<p>Amend GRUZ-P3 Rural character</p> <p>Ensure that subdivision, use and development in the General Rural Zone is consistent with the purpose and character of the zone and does not compromise primary production activities.</p>
GRUZ-P4 Avoid inappropriate subdivision	Oppose in part	Small lot subdivision should generally not be provided in the General Rural	Amend GRUZ-P4 Avoid inappropriate subdivision

		Zone and it must avoid highly productive land.	Subdivision for small lots in the General Rural Zone must: <ol style="list-style-type: none"> <li>1. Avoid highly productive land</li> <li>2. Avoid fragmenting primary production land</li> <li>3. Avoid reverse sensitivity effects on primary production activities</li> <li>4. Be consistent with the purpose and character of the zone.</li> </ol>
GRUZ-P6 Reverse sensitivity	Support	<p>Avoiding establishment of new sensitive activities is the most appropriate mechanism for avoiding reverse sensitivity effects.</p> <p>References to 'intensive farming' should be to 'intensive indoor primary production'.</p> <p>The NPSHPL has specific provision for reverse sensitivity that needs to be incorporated into GRUZ-P6.</p>	<p>Amend GRUZ-P6 by amending references to 'intensive farming' to 'intensive indoor primary production'.</p> <p>Amend GRUZ-P6 2) avoid the establishment of new sensitive activities near primary production activities through the use of setbacks and separation distances.</p>
GRUZ-R1 Buildings and structures, including construction, additions and alterations	Support in part	<p>The rule provides for buildings and structures for primary production activities – but HortNZ seeks a separate rule for artificial crop protection structures as they have specific requirements.</p> <p>There is potential for horticulture to expand in Wairarapa and artificial crop protection is likely in the future.</p>	<p>Include a new rule for artificial crop protection structures</p> <p><b>GRUZ-RX</b> – Artificial Crop Protection Structures and Crop Protection Structures</p> <p><b>Activity Status:</b> PER</p> <ol style="list-style-type: none"> <li>1. The establishment of a new, or expansion of an existing artificial crop protection structure or crop support structure.</li> </ol>

			<p><b>Where:</b></p> <ul style="list-style-type: none"> <li>a. The height of the structure does not exceed 6m; and Either:</li> <li>b. Green or black cloth is used on any vertical faces within 30m of a property boundary, including a road boundary, except that a different colour may be used if written approval of the owner(s) of the immediately adjoining property or the road controlling authority (in the case of a road) is obtained and provided to the Council; or</li> <li>c. the structure is setback 3m from the boundary</li> </ul> <p><b>Activity status when compliance not achieved:</b> When compliance with GRUZ-RX 1) is not achieved: RDIS Matters of discretion:</p> <ul style="list-style-type: none"> <li>1. Assessment of the potential glare on neighbouring properties (or road users) from the colour of the cloth</li> </ul>
GRUZ-R4 Worker accommodation	Support in part	It is unclear if GRUZ-R4 is permanent or seasonal worker accommodation. HortNZ seeks specific provisions to provide for seasonal worker	<p>Include a new rule and definition for Seasonal worker accommodation:</p> <p>Seasonal worker accommodation facilities in the</p>

		<p>accommodation. A rule is sought as part of the provisions to enable some seasonal worker accommodation to be provided for as a permitted activity. Where the standard is not able to be complied with a Restricted Discretionary activity would apply.</p>	<p>General Rural Zone is a permitted activity provided the following standards are complied with:</p> <ul style="list-style-type: none"> <li>a) The relevant Zone standards for building setbacks and height, are complied with.</li> <li>b) Access - No additional formed accesses are to be created to any State Highway</li> <li>c) Used solely for part of the year to meet labour requirements in the horticulture sector</li> <li>d) Comprises of a combination of communal kitchen and eating areas and sleeping and ablution facilities</li> <li>e) Accommodate up to 12 workers</li> <li>f) Provide 1 parking space per 6 workers to be accommodated</li> <li>g) Complies with Code of Practice for Able Bodied Seasonal Workers, published by Dept of Building and Housing 2008.</li> </ul> <p>Include a definition for seasonal worker accommodation: Means the use of land and buildings for the sole purpose of accommodating the short term labour requirement of a farming activity, rural industry or post harvest facility</p>
<p>GRUZ-R5 Primary production, quarrying, intensive farming and rural industry</p>	<p>Support</p>	<p>A permitted activity rule for primary production is supported. However the rule should provide for intensive indoor primary production - not intensive farming. HortNZ specifically seeks that</p>	<p>Amend intensive farming to intensive indoor primary production. Add ancillary rural earthworks to GRUZ-R5.</p>

		ancillary rural earthworks are provided as part of primary production activities.	
GRUZ-R6 Residential visitor accommodation	Oppose	HortNZ does not consider that stays of 90 days is 'visitor' accommodation and seek the deletion of the definition and rule.	Delete GRUZ-R6
GRUZ-R7 Residential activities	Support in part	The rule has a limitation for the Marlborough Soils Overlay. HortNZ considers that such an approach should also apply to highly productive land.	Amend GRUZ-R7 Residential activities 1b) Where the site is located within the Marlborough Soils Overlay <u>or on highly productive land</u> the number of residential units must not exceed:
GRUZ-R8 Intensive farming	Oppose in part	The rule should be for intensive indoor primary production to be consistent with the National Planning Standards.	Amend GRUZ-R8 to Intensive indoor primary production
GRUZ-R10 Rural produce retail	Support	A permitted activity for small rural produce is supported	Retain GRUZ-R10 but amend definition of rural produce retail.
GRUZ-R14 Visitor accommodation (excluding residential visitor accommodation)	Support	A discretionary activity for visitor accommodation in the General Rural Zone is supported.	Retain GRUZ-R14
GRUZ-R15 Rural industry	Oppose	Rural industry is included in GRUZ-R5 as a permitted activity. A discretionary activity status is not supported for an activity that is anticipated to occur in the GRUZ. There should be provision for small scale rural industry as a permitted	Delete GRUZ-R15 and replace with a permitted activity for small scale rural industry and an RDA for larger scale rural industry.



		activity and an RDA for larger scale rural industry.	
GRUZ-R17 Commercial and industrial activities not otherwise provided for	Support	Commercial and industrial activities are not anticipated in the General Rural Zone so it is appropriate that they are discretionary. However Rural industry should not require the same activity status. If rural industry is kept as discretionary then GRUZ-17 should be non-complying.  It should be clear that all commercial and industrial activities are discretionary in the General Rural Zone.	Amend GRUZ-17 Commercial and industrial activities <del>not otherwise provided for</del>
GRUZ-S1 Maximum building height	Support in part	Some frost protection fans are higher than 12m so seek inclusion of a specific standard for those.	Amend GRUZ-S1 3. Frost protection fans: 15m
GRUZ-S3 Building setbacks	Oppose in part	A building setback of 10m for any other boundary is not sufficient to mitigate reverse sensitivity effects. A larger boundary is sought for residential activities where reverse sensitivity effects are most likely to be generated.  HortNZ does not support the setback from surface waterbodies which includes artificial waterbodies.  Any setback should be linked to the size of the waterbody.	Amend GRUZ-S3 Buildings and structures must not be located within: a) 10m of any front road boundary of sealed roads b) 25m from front boundary of unsealed roads c) Residential activities 30m from any other boundary d) Other buildings 10m from any other boundary e) 20m of any significant waterbody

			f) 10m of any river wider than 3m
GRUZ-S4 Number of residential units	Oppose in part	There is no specific standard for worker accommodation and as S4 does not apply to GRUZ-R4 it is assumed that worker accommodation is in addition to the number of residential units in GRUZ-S4	Rename the standard: Number of residential units excluding worker accommodation and seasonal worker accommodation.
GRUZ-S5 Intensive farming	Oppose in part	The Standard should be for intensive indoor primary production.	Rename GRUZ-S5 as Intensive indoor primary production.
RLZ-O1 Purpose of rural lifestyle zone	Support	The objective is consistent with the description in the National Planning Standards	Retain RLZ-O1
RLZ-O3 Enable compatible activities	Support in part	It is unclear what 'light' primary production activities are. The National Planning Standards description does not differentiate primary production activities.	Amend RLZ-O3 by removing 'light'
RLZ-P2 Incompatible activities	Support in part	Reference to Rural Production Zone should be to General Rural Zone	Amend reference to Rural Production Zone to General Rural Zone
RLZ-S3 Building setback	Oppose in part	HortNZ seeks that there is a larger setback to the boundary with primary production activities.	Amend RLZ-S3 1 d) 30m from a boundary with the General Rural Zone