

# SUBMISSION ON

## Taupo District Plan

1 December 2022

**To:** Taupo District Council

**Name of Submitter:** Horticulture New Zealand

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# OVERVIEW

## Submission structure

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## Our submission

Horticulture New Zealand (HortNZ) thanks Taupo District Council for the opportunity to submit on the District Plan Change and welcomes any opportunity to continue to work with council and to discuss our submission.

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

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

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

# HortNZ's Role

## Background to HortNZ

HortNZ represents the interests of approximately 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. The horticulture sector is valued at 6.95bn.

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 Taupo

Although LUC 1-3 in the district is low at 33,197 hectares<sup>1</sup>, horticulture is an emerging market in the Taupo district due to the geothermal power source. In addition, the central north island provides ideal climatic conditions for growing tomatoes and capsicums due to cooler temperatures which cause the plants to reproduce more frequently.

By way of example, Gourmet Mokai has been established in the region since 2002 and uses geothermal to heat the glasshouses which cover five hectares. Around 50 full time staff are employed in addition to seasonal staff.

Vegetables grown include palermo, chillies, tomatoes and capsicums (around 175,000 capsicum and tomato plants are grown each year). The bulk of the produce is exported to Japan and Australia and to supplying the local market.

Other horticulture operations in the district include hydroponic lettuce and microgreens.

## 2. Summary of Decisions Sought by HortNZ

HortNZ seek the following outcomes:

- Definitions and rules that recognise the importance of primary production
  - Reverse sensitivity
  - Ancillary earthworks
  - Seasonal accommodation
  - Greenhouses
  - Artificial crop protection and crop protection structures
  - Frost fan and audible bird scarers
- Provisions that recognise highly productive land in line with the National Policy Statement Highly Productive Land
- Strategic direction that provides for primary production and which is not compromised by other activities
- Strategic direction for the rural environment
- Revised strategic direction that relates to council jurisdiction
- 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

## 3. Proposed Taupo District Plan

### 3.1. Strategic Direction

There is no strategic direction for the rural environment. By council's own reasoning, rural environment makes of most of the land in the district. As required by the planning standards,

<sup>1</sup> [https://ourenvironment.scinfo.org.nz/maps-and-tools/app/Land%20Suitability/Iri\\_luc\\_main](https://ourenvironment.scinfo.org.nz/maps-and-tools/app/Land%20Suitability/Iri_luc_main)

HortNZ has proposed a strategic direction for plan change 38 (rural environment) that provides for significant resource management matters for the rural environment throughout the district.

Plan change 38 (strategic direction) in its current form crosses jurisdiction boundaries between Waikato Regional Council and Taupo District Council. A regional council has the jurisdiction to manage water – discharges to water and water allocation. A district council is restricted to activities on the surface of water and land use activities. We support integrated resource management (particularly for freshwater) but are of the opinion that the strategic direction should be focused on matters that the Taupo District Council has jurisdiction (functions, powers and duties) over as prescribed in the RMA. The proposal appears intended to address urban related freshwater management issues but could be interpreted as a means of rural land use control to achieve freshwater management outcomes when no corresponding methods are or should be applied through the district plan.

To avoid confusion, regulatory duplication and inconsistency across planning documents, the strategic direction should be removed.

### **3.2. Plan Format**

The purpose of the of national planning standards is to improve efficiency and effectiveness of the planning system by providing nationally consistent:

- Structure
- Format
- Definitions
- Noise and vibration metrics
- Electronic functionality and accessibility

This is important for regional policy statements, regional plans, district plans and combined plans under the Resource Management Act 1991 ('RMA') and particularly important for the horticultural sector that typically operates across territorial boundaries such that the ability to easily navigate planning documents is necessary (as was the intent of the National Planning Standards 2019).

The format and structure of the rural and strategic direction chapter have not been drafted inline with the planning standards. These chapters will need to be redrafted to ensure standards are met. If the council is doing a rolling review, the new format can be used on a rolling basis.

### **3.3. 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 – 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.

### 3.3 General Zoning Approach

HortNZ supports the intent of the General Rural Environment (GRUZ) however protection of the rural zone from incompatible activities and reverse sensitivity should be strengthened.

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 the viability of horticultural operations within rural areas.

### 3.4 Highly Productive Land

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.

HortNZ seeks a definition for HPL and objectives, policies and rules that protect HPL from inappropriate use as well as to allow for buildings and activities that support primary production on HPL e.g postharvest facilities, wash houses seasonal accommodation etc.

### 3.5 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 because 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.

A definition is sought for reverse sensitivity and consideration given to appropriate setbacks throughout the plan to avoid reverse sensitivity effects.

## 4. Providing for horticultural activities in the rural environment



## 4.1 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.

## 4.2 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). Often then being caught by controls such as - yard setbacks, height limitations, height to boundary controls, building coverage limitations, impervious surface limitations, amenity controls (colour, reflectivity) etc. - which are not always relevant.

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>2</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)

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

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 CSS and ACPS in the GRUZ.

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

### **4.3 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 draft and are generally necessary on a boundary for some crops. HortNZ seeks a definition of shelterbelt to recognise the importance of mitigating spray drift.

### **4.4 Earthworks**

The industry requires several supporting activities and infrastructure to enable on-going 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 farming 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>3</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. Note: Cultivation is not covered by earthwork rules.

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<sup>3</sup> <https://www.hortnz.co.nz/assets/Compliance/Erosion-and-Sediment-Control-Guidelines-for-vegetable-production-v1.1.pdf>



## 4.5 Approach to Managing Greenhouses

Historically, and with changing practice, crop types and diversification in the horticultural sector, growers have become increasingly reliant on a variety of covered cropping methods to support rural production activities. Growing within a greenhouse can produce a more consistent yield and consistent quality of product for longer periods of the year in comparison to outdoor growing. On this basis HortNZ seeks a definition of greenhouse be included.

In the proposed plan, greenhouses are not included in the definition of 'Intensive Primary Production' which HortNZ supports. This is consistent with the definition for Intensive primary production in the National Planning Standards:

*"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"<sup>4</sup>.*

HortNZ does not consider that the rules for intensive primary production are appropriate for greenhouses, and instead they can be addressed through the rules applicable to primary production (which include performance standards relating to matters such as building coverage, height, setbacks, transport, light, noise etc.).

## 4.6 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 or seasonal basis. Ensuring adequate setbacks of dwellings from horticultural properties is an important part of minimising the potential for reverse sensitivity complaints.

If rural noise standards are being considered, 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
- Specific rules should be provided for some rural production activities that are not able to be controlled by noise standards such as frost fans and audible bird scaring devices. Such a provision is included in most district plans, such as Whakatane and Western Bay of Plenty and an example is provided below
- An exemption for normal primary production activities in the rural zone

The example below has a similar effect to sections 326-328 of the RMA.

### Exemption from noise standards

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

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<sup>4</sup> <https://environment.govt.nz/assets/publications/national-planning-standards-november-2019-updated-2022.pdf>

- 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
- Livestock

In the draft plan, frost fans and audible bird scaring devices have not been included in definitions or as a permitted activity in the GRUZ.

#### Frost Fans

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

#### Audible bird scarer devices

A bird scarer is a noise emitting device being used for the purpose of disturbing or scaring birds and can include a gas gun, avian distress alarm, or firearm when being used specifically for bird scaring. This is a necessary part of horticulture to protect the crop ready for harvest as birds can destroy an entire crop if not managed.

It is important to understand that audible bird scarers are used for a limited period of the year. They are not used year-round.

## **4.7 Biosecurity**

The issue of biosecurity relates to the maintenance and enhancement of biodiversity values in the district. There is a 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.

## Submission on PC 38 and 42 to the Taupo District Plan

Without limiting the generality of the above, HortNZ seeks the following decisions on the plan change 38 and 42, as set out below, or alternative amendments to address the substance of the concerns raised in this submission and any consequential amendments required to address the concerns raised in this submission.

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

Provision	Support/ oppose	Reason	Decision sought
<b>Definition</b>			
Intensive indoor primary production	Oppose in part	Definition doesn't align with the National Planning Standards	Amend definition  <b>Means primary production</b> activities that principally occur within buildings <del>that</del> <b>and</b> involve growing <del>produce</del> <b>fungi</b> or keeping or rearing livestock (excluding calf-rearing for a specified time period) or poultry.
Residential activities	Oppose in part	Unsure why this definition is noted for rural environment only. Definition should apply across the board	Amend <del>(Rural Environment)</del> the use of land and buildings by people for the purpose of permanent living accommodation and includes associated accessory buildings.
Rural industry	Oppose in part	Definition doesn't align with the National Planning Standards	

			<p><b><u>Means industry or business undertaken in a rural environment</u></b> an activity that directly supports, services, or is dependent on primary production and has a locational need to be within the General Rural Environment (rather than an urban environment). These activities include, but are not limited to; forestry, agriculture, dairy farming and geothermal/electricity generation.</p>
<p>New definition - <u>Ancillary rural earthworks</u></p>	<p>New definition</p>	<p>There is a need to provide for 'day-to-day' activities that are integral to productive land use in the rural zone.</p> <p>In HortNZ's experience, providing a definition for ancillary rural earthworks and a clear rule framework is an efficient approach.</p> <p>Cultivation (gardening, and the disturbance of land for the installation of fence posts) are excluded from the definition of earthworks, however there are other activities which HortNZ seeks to provide for.</p>	<p>Amend to include a definition of 'ancillary rural earthworks'</p> <p><b><u>Ancillary rural earthworks means earthworks associated with primary production, such as:</u></b></p> <ul style="list-style-type: none"> <li><b><u>a. maintenance of drains, troughs and installation of their associated pipe networks, drilling bores and offal pits, burying of dead stock and plant waste, erosion and sediment control measures</u></b></li> <li><b><u>b. the burying of material infected by unwanted organisms as declared by the Ministry of Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993.</u></b></li> </ul>

			Note: For clarity, it is noted that cultivation is not 'defined as earthworks'.
New definition - <u>Agricultural aviation movements</u>	New definition	A definition would provide clarity within the plan - as detailed in this submission, HortNZ seeks to clearly provide for this activity as a permitted activity in rural zones due to its intermittent nature.	<p>Include a definition for 'agricultural aviation movements',</p> <p><b><u>Agricultural aviation movements mean intermittent aircraft and helicopter movements for purposes ancillary to primary production activities, including topdressing, spraying, stock management, fertiliser application, and frost mitigation, and associated refuelling.</u></b></p>
New definition - <u>Artificial crop protection structures and Crop support structures</u>	New definition sought	<p>As noted above, HortNZ seek to ensure that these structures are not inadvertently covered by inappropriate effects standards, where there is a risk that they may be considered 'buildings' (due to inconsistency in interpretation).</p> <p>A way of addressing this is to provide a clear framework through a definition and specific standard or rule for the rural zone.</p> <p>For further clarity, a definition of crop support structure could also be</p>	<p>Include a definition for 'artificial crop protection structures'</p> <p><b><u>Artificial crop protection structure means structures with material used to protect crops and/or enhance growth (excluding greenhouses).</u></b></p> <p><b><u>Note: For the avoidance of doubt artificial crop protection structures are not a building.</u></b></p> <p>Include a definition for 'artificial support structure'</p>

		included as this term is referred to in the plan also.	<b><u>Crop support structure means an open structure on which plants are grown</u></b>
New definition - <u>Audible bird scaring device</u>	New definition	These devices are used at certain times of the year to scare birds from certain crops. They are a significant part of horticulture production.	Include <b><u>Gas guns and avian distress alarms used for the purposes of disturbing or scaring birds, and excludes firearms and vehicles used for that purpose.</u></b>
New definition - <u>Frost fans</u>	New definition	Frost fans are used on horticultural properties to prevent frost damage to crops, mainly fruit crops such as kiwifruit, summerfruit, and apples. Frost damage to crops, particularly at bud burst, can cause reduced crop yield and hence reduced revenue.	Include <b><u>Means a machine used to move air around a horticultural or rural site for the purpose of drying fruit or mitigating the effects of frost.</u></b>
New definition - <u>Greenhouse</u>	New definition	A definition should be included for greenhouses to support diversification to alternative growing methods	Include a definition for greenhouses <b><u>Greenhouses means a structure enclosed by glass or other transparent impermeable material and used for the cultivation or protection of plants in a controlled environment but excludes artificial crop protection structures</u></b>
New definition - <u>Highly productive land</u>	New definition	Include definition consistent with the National Policy Statement Highly Productive Land	Include definition in consideration to National Policy Statement Highly Productive Land



New definition - <u>Land based primary production</u>	New definition	Include definition consistent with the National Policy Statement Highly Productive Land	Add definition <b><u>Production from agricultural, pastoral, horticultural, or forestry activities, that is reliant on the soil resource of the land</u></b>
New definition - <u>National Grid Yard</u>	New definition	The National Policy Statement on Electricity Transmission 2008 (NPSET), a planning document under the Resource Management Act 1991 (RMA), requires Council's to give effect to the NPSET objectives and policies in all plan documents.  A council's district may give effect to the NPSET by including specific rules about subdivision, land use and development near National Grid transmission lines and substations.	Define National Grid Yard as follows: <b><u>The area located within:</u></b> <ul style="list-style-type: none"> <li>• <b><u>12m in any direction from the visible outer edge of a National Grid tower; or</u></b></li> <li>• <b><u>10m in any direction from a National Grid single pole or pi-pole; or</u></b></li> <li>• <b><u>The area located within 10m either side of the centreline of any overhead 110kV National Grid line on single or pi-pole; or</u></b></li> <li>• <b><u>The area located within 12m either side of the centre line of any overhead National Grid line on towers.</u></b></li> </ul>
New definition - <u>Noise</u>	New definition	Consistent with National Planning Standards and RMA	Include definition <b><u>Has the same meaning as in section 2 of the RMA</u></b> <b><u>Includes vibration.</u></b>
New definition - <u>Primary Production</u>	New definition	Include definition to align with planning standards	Include definition

			<p>means:</p> <ul style="list-style-type: none"> <li>• <b><u>any aquaculture, agricultural, pastoral, horticultural, mining, quarrying or forestry activities; and</u></b></li> <li>• <b><u>includes initial processing, as an ancillary activity, of commodities that result from the listed activities in a);</u></b></li> <li>• <b><u>includes any land and buildings used for the production of the commodities from a) and used for the initial processing of the commodities in b); but</u></b></li> <li>• <b><u>excludes further processing of those commodities into a different product.</u></b></li> </ul>
<p>New definition - <u>Reverse sensitivity</u></p>	<p>New definition</p>	<p>A definition for reverse sensitivity that should be included in the Plan.</p>	<p>Include a new definition for reverse sensitivity</p> <p><b><u>Means the vulnerability of an existing lawfully established activity to other activities in the vicinity which are sensitive to adverse environmental effects that may be generated by such existing activity, thereby creating the potential for the</u></b></p>

			<b><u>operation of such existing activity to be constrained</u></b>
New definition - <u>Rural produce retail</u>	New definition	To support retail sales of produce in rural zone	Include definition <b><u>Means the sale of rural produce grown or produced by the rural production operation, including products manufactured from that produce</u></b>
New definition - <u>Seasonal worker accommodation</u>	New definition	Include a definition for seasonal worker accommodation as it is distinct from visitor accommodation.	Insert new definition as follows: <b><u>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.</u></b>
New definition - <u>Shelterbelt</u>	New definition	Shelter belts protect crops from winds and mitigate spray drift	Include definition <b><u>Means any trees planted primarily to provide shelter for stock, crops or buildings from the prevailing wind(s) or to mitigate potential spray drift from agrichemical applications</u></b>
<b>Objectives and Policies - General Rural Environment</b>			
3b.2.1 Enable primary production	Support		Retain

Objective - OX	New	To provide for primary production and ancillary activities in rural zone	Include OX <b><u>The rural zone is used for primary production activities, ancillary activities that support primary production and other compatible activities that have a functional and operational need to be in a rural environment.</u></b>
3b.2.2 Maintaining the established General Rural character	Support		Retain
3b.2.3 Rural industry	Support		Retain
3b.2.4 Other activities	Support in part	It is important that visitor accommodation and tourism activities in the rural environment is of a scale and/or managed such that it does not impact on the ability to productive use rural land.	Amend  Māori cultural activities, tourism activities, visitor accommodation and renewable electricity generation and transmission activities are enabled in the General Rural Environment <b><u>where they do not adversely impact on the productive land use</u></b>
3b.2.5 Avoidance of reverse sensitivity	Support		Retain

<p>3b.2.9 Maintaining the established character</p>	<p>Oppose in part</p>	<p>Current policy is somewhat draconian and limits activities</p>	<p>Delete policy and replace</p> <p><b><u>Land use and subdivision activities are undertaken in a manner that maintains or enhances the rural character and amenity of the rural zone, which includes:</u></b></p> <ul style="list-style-type: none"> <li><b><u>i. a predominance of primary production activities</u></b></li> <li><b><u>ii. generally open space between built structures</u></b></li> <li><b><u>iii. typical adverse effects such as odour, noise and dust associated with a rural working environment; and</u></b></li> <li><b><u>iv. a diverse range of rural environments, rural character and amenity values throughout the district.</u></b></li> </ul>
<p>Policy - PX</p>	<p>New</p>	<p>Subdivision should be avoided in the rural environment</p>	<p><b><u>Avoid subdivision that:</u></b></p> <ul style="list-style-type: none"> <li><b><u>i. results in the loss of highly productive land for use by land based primary production;</u></b></li> </ul>

			<ul style="list-style-type: none"> <li>ii. <b><u>fragments land into parcel sizes that are no longer able to support land based primary production, taking into account:</u></b></li> <li>iii. <b><u>the type of farming proposed; and</u></b></li> <li>iv. <b><u>whether smaller land parcels can support more productive forms of farming due to the presence of highly productive land.</u></b></li> <li>v. <b><u>provides for rural lifestyle living unless there is an environmental benefit.</u></b></li> </ul>
Policy - PX	New	<p>Consistent with National Policy Statement of Highly Productive Land.</p> <p>Avoids incompatible activities from rural environment.</p>	<p><b><u>Avoid land use that:</u></b></p> <ul style="list-style-type: none"> <li>i. <b><u>is incompatible with the purpose, character and amenity of the general rural environment;</u></b></li> <li>ii. <b><u>does not have a functional need to locate in the general rural environment and is more appropriately located in another zone;</u></b></li> </ul>



			<ul style="list-style-type: none"> <li>iii. <b><u>would result in the loss of productive capacity of highly productive land;</u></b></li> <li>iv. <b><u>would exacerbate natural hazards; and</u></b></li> <li>v. <b><u>cannot provide appropriate on-site infrastructure.</u></b></li> <li>vi. <b><u>could result in reverse sensitivity effects</u></b></li> </ul>
3b.2.10 Residential units	Support		Retain
3b.2.13 Avoiding reverse sensitivity	Support in part	Amend policy to avoid and mitigate reverse sensitivity effects	Amend and replace with <b><u>Manage the establishment, design and location of new sensitive activities and other non-productive activities in the general rural environment to avoid where possible, or otherwise mitigate, reverse sensitivity effects on primary production activities.</u></b>
3b.2.14 Commercial and industrial activity	Support in part	These activities should be avoided in the rural environment	Amend  Limit the scale of <b>Avoid</b> commercial and industrial activity to avoid the uptake of general rural land by activities that are provided for in other Environments and may impact on the availability of land for primary

			production activities within the general rural environment.
3b.3.1 Maintain the character of the Rural Lifestyle Environment	Support		Retain
3b.3.2 Avoid reverse sensitivity	Support		Retain
3b.3.3 Commercial and industrial activities	Support		Retain
3b.3.4 Consolidate rural lifestyle activities	Oppose	It is unclear what this objective hopes to achieve. Rural lifestyle activities are not defined in the plan	Delete 3b.3.4
3b.3.9 Character of the Rural Lifestyle Environment	Support in part	It is not clear 'what dominating the landscape' means. Rural buildings can be large in nature.	Amend  <del>b) Accessory buildings that do not dominate the landscape.</del> <del>c) Dwellings may be large but are surrounded by open space and do not dominate the landscape.</del>
<b>General Rural Zone</b>			
4b.1.7	Oppose	There are no provisions for artificial crop protection structures and a	<b><u>Amend</u></b>

High voltage transmission lines

setback of 12m from a critical electricity line would compromise horticultural activities.

If the activity complies with NZECP34:2001 then the activity should be permitted, not just when being undertaken by a network utility operation.

**Rename to National Grid and delete High Voltage Transmission Lines**

**Delete 4b.1.7 and replace**

**Activity status: Permitted**

**Where: PER-1**

**No new building(s) or structures, and extensions shall be erected within 12m of any National Grid support structure, except for fences less than 2.5m in height and more than 5m from the support structure.**

**PER-2**

**Under the National Grid Conductors (wires) the following can occur:**

- **A fence less than 2.5m in height**
- **An extension to existing buildings used for sensitive activities that do not increase the building envelope**
- **Non habitable buildings ancillary to a farming activity, such as milking sheds, piggeries, poultry sheds,**

			<p><b><u>greenhouses and protective canopies.</u></b></p> <p><b><u>This rule does not apply to: network utilities within a transport corridor or any part of electricity infrastructure that connects the National Grid.</u></b></p> <p><b><u>NOTES:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Structures and activities located near transmission lines must comply with the safe distance requirements in the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001). Compliance with this plan does not ensure compliance with NZECP34:2001;</u></b></li> <li>• <b><u>Vegetation planted near the National Grid Yard should be selected and/or managed to ensure that it complies with the Electricity (Hazards from Trees) Regulations 2003.</u></b></li> </ul>
4b.1.8 Buildings within Outstanding Landscape Areas	Oppose in part	While the rule heading relates to buildings, the provisions within the rule relate to structures - these are two separate things.	Amend Delete 'structures' and replace with <b><u>'buildings'</u></b> .

			Allow rule for artificial crop protection structure as a permitted activity within outstanding landscape area
4b.1.9 Earthworks within Outstanding Landscape Areas	Oppose in part	There should be allowances for permitted activity for primary production earthworks and indigenous vegetation clearance	<p>Amend 4b.1.0 to include PER</p> <p><b><u>Activity status: Permitted</u></b></p> <p><b><u>Where:</u></b></p> <p><b><u>PER-1</u></b></p> <p><b><u>The earthworks or indigenous vegetation clearance is:</u></b></p> <p><b><u>required for repair or maintenance</u></b></p> <p><b><u>required to provide for safe and reasonable clearance for existing overhead power lines.</u></b></p> <p><b><u>necessary to address a risk to public health and safety.</u></b></p> <p><b><u>for biosecurity reasons.</u></b></p> <p><b><u>for the sustainable non-commercial harvest of plant material for rongoā Māori.</u></b></p> <p><b><u>PER-2</u></b></p> <p><b><u>The earthworks or indigenous vegetation clearance outside the</u></b></p>

			<b><u>coastal environment complies with standard earthworks or indigenous vegetation clearance</u></b>
4b.1.10 Intensive indoor primary production and rural industry	Support in part	Note proposed amendments for 4b.2.2	Retain however note amendments to 4b.2.2
4b.2.2 Intensive indoor primary production and rural industry	Support in part	The standard provides for 10% site coverage by buildings or structures - due to nature of ancillary buildings, an increase of 12.5% is proposed.  There should be provision for a greater site coverage of artificial crop protection structures and green houses	Amend 4b.2.2 by adding:  <del>10</del> <b>12.5%</b> of the total allotment area <b><u>This standard does not apply to:</u></b> <b><u>a. Artificial crop protection structures</u></b> <b><u>b. Greenhouses</u></b>
GRUZ - RX Seasonal worker accommodation	New rule	The provision of seasonal worker accommodation is becoming a necessary supporting activity to horticultural operations. HortNZ is seeking a suite of provisions to provide for this activity - this is explained in more depth in the submission.  HortNZ seeks that where seasonal worker accommodation does not meet the permitted activity standards, that	Include a permitted activity rule for Seasonal Worker Accommodation <b><u>RPROZ-RX - Seasonal Worker Accommodation</u></b> <b><u>Activity Status: PER</u></b> <b><u>1. The establishment of a new, or expansion of existing seasonal worker accommodation.</u></b> <b><u>Where:</u></b>



this default to a Restricted Discretionary rule.

**a. The seasonal worker accommodation is associated with horticultural activity**

**b. The accommodation comprises of a combination of communal kitchen and eating areas and sleeping and ablution facilities**

**c. The accommodation provides for no more than 12 workers**

**d. It complies with Code of Practice for Able Bodied Seasonal Workers, published by Dept of Building and Housing 2008.**

**Where this activity complies with the following rule requirements:**

**4b.2.5 - Maximum height**

**4b.2.6 - Setbacks**

**Activity status when compliance not achieved:**

**2. When compliance with RPROX-RX 1. (a)-(d) is not achieved: RDIS Matters of discretion:**

**Those matters in RPROZ-RX 1. (a)-(d) that are not able to be met**

			<p><b><u>Methods to avoid, remedy or mitigate the effects on existing activities, including the provision of screening, landscaping and methods for noise control</u></b></p> <p><b><u>The extent to which the application complies with the Code of Practice for Able Bodied Seasonal Workers, published by Dept of Building and Housing 2008</u></b></p> <p><b><u>4.Where compliance with any rule requirement is not achieved: Refer to relevant Rule Requirement</u></b></p> <p><b><u>Note: HortNZ has elsewhere in this submission sought definitions be included for Seasonal Worker Accommodation.</u></b></p>
<b>Performance Standards - General Rural Environment</b>			
4b.2.5 Maximum building height	Support in part	Provision to exclude artificial crop protection structures	Amend 4b.2.5 <b><u>This standard does not apply to:</u></b> <b><u>a. Artificial crop protection structures</u></b>
4b.2.6	Support in part	A clear distinction should be provided for habitable buildings. 15 meters is	Amend 4b.2.6

<p>Minimum building setbacks</p>		<p>considered insufficient to address potential reverse sensitivity effects.</p>	<p>i. 30 metre setback for <b>habitable</b> dwellings and minor residential units from the front boundary</p> <p>ii. <del>45</del><b>20</b> metres from all other boundaries.</p> <p>vii. <b><u>Artificial crop protection and support structures must be setback at least 1 m from all site boundaries</u></b></p>
<p>4b.2.7 Minor residential units</p>	<p>Support in part Oppose in part</p>	<p>HortNZ does not support combined standard for accommodation activities due to reverse sensitivity effects. Separate rules and standards should be drafted for:</p> <ul style="list-style-type: none"> <li>• Visitor accommodation</li> <li>• Seasonal accommodation</li> <li>• Tiny homes/caravans</li> </ul> <p>The standards relating to buildings should be included in these rules</p>	<p>A maximum of one minor residential unit per primary residential unit per allotment.</p> <p>i. All minor residential or accommodation activity units shall:</p> <p>a. <del>Be no larger than 100m<sup>2</sup></del> <b><u>Not exceed a GFA of 65m<sup>2</sup></u></b> in size.</p> <p>b. Be located no greater than <del>20</del> <b>15</b> metres from the primary residential unit.</p> <p>c. Share an accessway/driveway with the primary residential unit.</p> <p><del>NOTE: Minor residential units also include accommodation activities, tiny</del></p>

			<p><del>homes/houses, caravans and other structures used for accommodation for more than two consecutive months in a calendar year on the allotment.</del></p>
<p>4b.2.8 Commercial and industrial activities, and home businesses</p>	<p>Support in part</p>	<p>Commercial and industrial activities should be restricted in the rural production zone. 100m<sup>2</sup> allowance is significant. This rule contradicts objective 3b.2.3</p>	<p>Amend 4b.2.8 (i)</p> <p>Any indoor or outdoor space used for commercial, industrial <del>or home business purposes</del>, shall have a gross floor area less than <del>100</del><b>50</b>m<sup>2</sup> for indoor activities, or 100m<sup>2</sup> of land area for <b>and</b> outdoor activities.</p> <p>Include PER for home business</p> <p><b><u>PER - 1</u></b></p> <p><b><u>The home business is undertaken within:</u></b></p> <ul style="list-style-type: none"> <li><b><u>i. a residential unit; or</u></b></li> <li><b><u>ii. an accessory building that does not exceed 40m<sup>2</sup> GFA; or</u></b></li> <li><b><u>iii. a minor residential unit.</u></b></li> </ul>

**PER-2**

**There is no more than two full-time equivalent persons engaged in the home business who reside off-site**

**PER-3**

**Hours of operation are between:**

**7am-8pm Monday to Friday.**

**8am-8pm Weekends and public holidays.**

- i. Any indoor or outdoor space used for commercial, industrial or home business purposes, shall have a gross floor area less than 100m<sup>2</sup> for indoor activities, or 100m<sup>2</sup> of land area for outdoor activities.**
- ii. For home businesses the principal operator of the home business must be a permanent resident on the**

			<b><u>site to which the home business relates.</u></b>
4b.2.9 Maximum noise limits	Support		Retain
Noise - RX Frost Fans	New rule		<p>Include NOISE - RX</p> <p><b><u>PER-1</u></b> <b><u>The use is for the protection of crops from frost only</u></b></p> <p><b><u>PER-2</u></b> <b><u>Maintenance or use of frost fans is undertaken between 7am and 10pm. Testing outside these hours may only take place for urgent unforeseen maintenance purposes or for testing operational readiness.</u></b></p> <p><b><u>PER-3</u></b> <b><u>The maximum noise generated by a single or multiple frost fans shall not exceed 55 dB LAeq(15min) at any time when assessed within the notional boundary of any noise sensitive activity on another site</u></b></p> <p><b><u>PER-4</u></b></p>

**Frost fans are only operated when the air at canopy height is 2 degrees C or less**

**Activity status when compliance not achieved:**

**RDIS**

**Matters of discretion are restricted to:**

- **Operational requirements of frost control fans;**
- **Proximity to a residential area or dwelling including the visual effects;**
- **Noise mitigation measures;**
- **Generation of noise with special audible characteristics;**
- **Frequency and duration of operation**
- **Location, orientation**

**Monitoring and reporting**

<p>Noise - RX Audible bird scaring devices</p>	<p>New rule</p>		<p>Include NOISE - RX Activity status: Permitted</p> <p><b><u>Where:</u></b></p> <p><b><u>PER-1</u></b> <b><u>Bird scaring devices must only be used between 7.00am and 7.00pm on any calendar year</u></b></p> <p><b><u>PER-2</u></b> <b><u>Bird scaring events from any device shall operate at:</u></b></p> <p><b><u>Not more than 12 events per hour where an event includes clusters of up to three shots from percussing type devices or three individual shots from a firearm in quick succession</u></b></p> <p><b><u>A maximum noise level frequency of 65 dB LAE within the notional boundary of any noise sensitive activity not owned by the operator of the device</u></b></p> <p><b><u>PER-3</u></b></p>
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**The audible bird scaring device complies with standard:**

**NOISE-4b.4.13 Maximum Noise Levels.**

**This standard does not apply to: bird scaring devices that generate a noise level less than 55 dB LAE within the notional boundary of any noise sensitive activity not owned by the operator of the device.**

**Activity status where compliance not achieved with PER-1 or PER-2: Restricted Discretionary**

**Matters of discretion are restricted to:**

- **the level, hours of operation, duration and nature of the noise;**
- **proximity and nature of nearby activities and the adverse effects they may experience from the noise;**

			<ul style="list-style-type: none"> <li>• <u>the existing noise environment;</u></li> <li>• <u>effects on character and amenity values on the surrounding environment;</u></li> <li>• <u>effects on the health and wellbeing of people; and</u></li> <li>• <u>any noise reduction measures.</u></li> </ul> <p><b><u>Activity status where compliance not achieved with PER-3: Non-complying</u></b></p>
4b.2.13	Support	Support however recommend adding primary production activities to be consistent with National Planning definition	<p>Amend to be consistent with National Planning definition</p> <p>Nothing in the foregoing Performance Standards shall apply to <b>primary production activities</b> <del>farm animals including working dogs, and to agricultural and forestry vehicles, agricultural and forestry machinery or equipment (including mobile plant at produce packing facilities but excluding sawmilling equipment), operated and maintained in accordance with the manufacturer's specifications in accordance with accepted management practices (e.g.</del></p>

			for milking, spraying, harvesting, packing, forest harvesting and the like).
4b2.15 Signage	Support in part	Allows for more signage coverage for rural retail and home business	<p>Maximum of one sign per allotment.</p> <p>i. <del>Maximum total face area of sign = 2m<sup>2</sup>.</del> <b><u>The maximum total of sign area on any site must not exceed 3m<sup>2</sup>. Where a sign is double-sided, the maximum sign area is calculated as the area of one side of the sign.</u></b></p> <p>ii. Signage must relate to the activity undertaken on the allotment.</p> <p>iii. No flashing, reflectorised or illuminated signage.</p> <p>iv. <del>One temporary sign per allotment for the sale of land or buildings of not more than 2m<sup>2</sup> total face area.</del> <b><u>There shall be no more than two signs per site.</u></b></p> <p>EXCEPTIONS: Official signs required by statute and warning signs related to</p>

			aspects of public safety are not required to comply with the standards.
<b>Rural Lifestyle Performance Standards</b>			
4b.4.6 Maximum building height	Support in part	Unclear why maximum building height is not the same as in the GRUZ	Amend  i. The maximum height of a building shall not exceed <del>40</del> <b>12</b> metres
4b.4.7 Minimum building setbacks	Support in part	A clear distinction should be provided for habitable buildings. 15 meters is considered insufficient to address potential reverse sensitivity effects.	Amend 4b.2.7  iii. 30 metre setback for <b>habitable</b> dwellings and minor residential units from the front boundary iv. <del>45</del> <b>20</b> metres from all other boundaries.  vii. <b><u>Artificial crop protection and support structures must be setback at least 1 m from all site boundaries</u></b>
4b.4.9 Home business, commercial, and retail activities	Support in part	Commercial and retail activities should be restricted in the rural lifestyle zone. 100m <sup>2</sup> allowance is significant. This rule contradicts objective 3b.2.3	Amend  Delete commercial and retail activities from the rule Include PER for home business <b><u>PER - 1</u></b>

**The home business is undertaken within:**

- i. a residential unit; or**
- ii. an accessory building that does not exceed 40m<sup>2</sup> GFA; or**
- iii. a minor residential unit.**

**PER-2**

**There is no more than two full-time equivalent persons engaged in the home business who reside off-site**

**PER-3**

**Hours of operation are between:**

**7am-8pm Monday to Friday.**

**8am-8pm Weekends and public holidays.**

**Any indoor or outdoor space used for commercial, industrial or home business**

**purposes, shall have a gross floor area less than 100m<sup>2</sup>**

**for indoor activities, or**

			<p><b><u>100m<sup>2</sup> of land area for outdoor activities.</u></b></p> <p><b><u>ii. For home businesses the principal operator of the home business must be a permanent resident on the site to which the home business relates.</u></b></p>
			<p>Amend</p> <p><del>Maximum one sign per allotment.</del></p> <p><b><u>There shall be no more than one sign for each road frontage.</u></b></p> <p>ii. Maximum total face area - 1m<sup>2</sup>.</p> <p>iii. Signage must relate to the activity undertaken on the allotment.</p> <p>iv. No flashing, reflectorised or illuminated signs.</p> <p>v. <del>One temporary sign per allotment, 2m<sup>2</sup> total face area, for the sale of land or buildings</del> <b><u>The maximum total of sign area on any site must not exceed 1.5m<sup>2</sup>. Where a sign is double-sided, the maximum sign area is calculated as the area of one side of the sign.</u></b></p>
4b.4.12 Maximum Artificial Light Level	Support in part	To align with Lux levels from other district plans	<p>Amend</p> <p>⊘ <b>10</b> LUX (lumens per square meter) at the boundary</p>

Subdivision			
<p>4b.5.1 Subdivision - General Rural Environment</p>	<p>Oppose in part</p>	<p>Unclear why there are two rules for subdivision based on lot size. A controlled activity subdivision status means that affected parties would not be consulted as part of the subdivision application. This is particularly relevant to the Rural Production Zone where the potential for adverse effects on adjoining land uses exist and effects on highly productive land which the plan seeks to protect. A controlled activity will not achieve that outcome.</p>	<p>Delete GRUZ from controlled activity rule</p> <p><b><u>Activity status - Restricted discretionary</u></b></p> <p><b><u>RDIS-1</u></b>  <b><u>Where subdivision complies with standards:</u></b>  <u>minimum lot sizes</u>  <u>Requirements for building platform for each allotment</u>  <u>Water supply</u>  <u>Stormwater management</u>  <u>Wastewater disposal</u>  <u>Telecommunications and power supply</u>  <u>Easements for any purpose</u>  <u>Note: Text in yellow should relate to SUB standards however these have not been included in draft</u>  <b><u>Matters of discretion are limited to:</u></b></p> <ul style="list-style-type: none"> <li><b><u>The potential adverse effects on adjoining horticultural and agricultural activities, including reverse sensitivity effects</u></b></li> </ul>

			<p><b><u>NOTE: Applications for restricted discretionary subdivision within the Rural Production Zone will be notified</u></b></p> <p><b><u>Activity status where compliance is not achieved - Discretionary</u></b></p>
<p>4b.5.2 Subdivision - Rural Lifestyle Environment that adjoins the General Rural Environment</p>	<p>Oppose in part</p>	<p>Unclear why there are two rules for subdivision based on lot size. A controlled activity subdivision status means that affected parties would not be consulted as part of the subdivision application. This is particularly relevant to the Rural Production Zone where the potential for adverse effects on adjoining land uses exist and effects on highly productive land which the plan seeks to protect. A controlled activity will not achieve that outcome.</p>	<p>Amend</p> <p>Subdivision resulting in lots that are 4 hectares or larger adjoining the General Rural Environment is a <del>controlled activity.</del> <b><u>restricted discretionary activity</u></b></p>
<p>4b.5.7 Subdivision - Outstanding Landscape Areas</p>	<p>Support in part</p>	<p>Subdivision of land particularly in the rural zone should be avoided regardless of lot size</p>	<p>Amend</p> <p>Any subdivision of land in the General Rural Environment or Rural Lifestyle Environment that is located within an Outstanding Landscape Area <del>where the resulting lots are less than 10 hectares,</del> is a non-complying activity.</p>



4b.5.8 Subdivision - Bonus lots	Oppose	The draft NPSIB requires councils to identify and map areas of SNA. Unclear why this rule has been drafted as contradicts....i (a) states Each Bonus Lot must correspond to no less than 4ha of a Nominated Significant Natural Area while c (i) states that the Bonus Lot(s) will not be located within any of the following - Significant Natural Area,	Delete rule
<b>Strategic Direction Rural Environment</b>			
SD - SX	New	Add new strategic direction for rural environment	Add to chapter 38  <u><b>SD - RE-01</b></u>  <u><b>Primary production activities are recognised and provided for to enable them to operate efficiently and effectively to ensure the contribution for the economic and social wellbeing of the district and not be compromised by inappropriate subdivision, use and development</b></u>  <u><b>SD - RE - 02</b></u>  <u><b>Protection of highly productive land from inappropriate development to</b></u>

			<b><u>ensure its production potential for generations to come.</u></b>
<b>PC 38 Strategic Direction</b>			
<b>SD</b>	Oppose in part	Council has no jurisdiction over the matters raised in 2.2	<p>Delete</p> <p><del>2.2 strategic direction freshwater quality / te mana o te wai</del></p> <p><del>The health and wellbeing of the lakes and rivers in the district have been degraded both directly and indirectly over recent decades. This degradation includes declining water quality, loss of indigenous biodiversity, loss of access and declining water availability and is the result of activities both on land and in the water bodies themselves. Waterways continue to face increasing demands for use, such as</del></p> <p><del>takes for irrigation and drinking water, hydro power generation, and assimilation of discharges from towns, agriculture and other industry; as well as pressures arising from land management practices, land use change and intensification. Holistic and integrated management of land and water resources is critical to reversing declining trends</del></p>

