

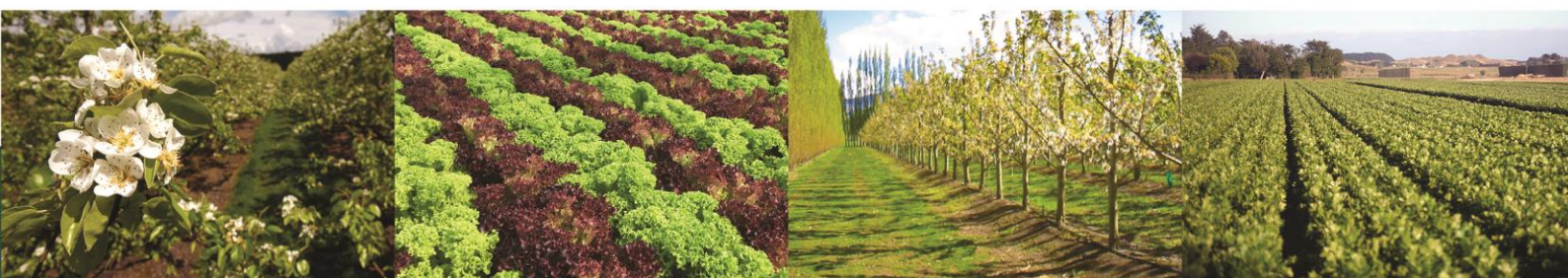
SUBMISSION ON

Proposed New Plymouth District Plan

22 November 2019

TO: New Plymouth District Council

NAME OF SUBMITTER: Horticulture New Zealand



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Introduction

Horticulture New Zealand (HortNZ) thanks New Plymouth District Council (NPDC) for the opportunity to submit on the proposed New Plymouth District Plan and welcomes any opportunity to work with NPDC and to discuss our submission.

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

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

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

Background to HortNZ

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

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

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

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

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

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

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

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

HortNZ's Resource Management Act 1991 Involvement

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

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

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

Horticulture in the New Plymouth District

Based on Fresh Facts data from 2018 there is more than approximately 151ha of horticultural activity in the Taranaki region; with approximately 63ha in fruit and approximately 53 ha in vegetables. HortNZ data suggests that this growing activity is largely within the New Plymouth District. Crops that are grown include avocado, berries, summer fruit, tamarillo, herbs, Brassicas, capsicums (Indoor) and potatoes.

While the horticultural industry is small in New Plymouth; the Taranaki region has the climate, soil and rainfall to support a range of horticultural activity¹.

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Generally, HortNZ support the policy and rule framework within the proposed New Plymouth District Plan. HortNZ key interests are preventing an inappropriate restriction on existing growing activities, provide a framework that enable horticulture growth should this occur (future proofing) and is also a response to issues and matters which HortNZ has experienced in other district plan change processes.

Key areas of interest addressed in HortNZ's submission are detailed below. Specific submissions on provisions of the proposed Plan are provided in the table below.

'Protection' of the rural zone from incompatible activities and reverse sensitivity

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

Another issue which can impact on the viability and operation of horticultural operations is reverse sensitivity, from other land uses which establish with the rural zone or from other legitimate activities at an urban/rural interface.

It is noted that the s32 report states that *"A key finding of the review of the existing rural provisions, is that the Operative District Plan does not consider, with the exception of a limited number of activities, such as poultry farming, the effects resulting from reverse sensitivity prior to an activity establishing in the rural area"*.

In general, reverse sensitivity is recognised throughout the plan. Specific submission points below seek amendments to strengthen the policy framework with regard to reverse sensitivity.

Draft National Policy Statement on Highly Productive Land (NPS HPL)

While only draft, HortNZ highlights the need to be cognisant of draft NPS HPL and the protection this seeks to afford highly productive land.

It is recognised that there is limited direction on this matter in the Taranaki Regional Policy Statement, however HortNZ seeks greater guidance and consistency in regard to highly productive land, as there are a range of undefined terms used throughout the plan e.g. 'productive, versatile land' of significance to the district (UFD-24), 'versatile land' (RPROZ-P2), 'productive potential of highly productive soils and versatile rural land' (RPROZ-O3),

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https://venture.taranaki.info/VT.Venture/media/Publications/vt0313_horticulture_report_web4.pdf?ext=.pdf

'soil productivity, versatility of land' (RPROZ-O6) and 'significant rural production values and/or versatility' (RLZ-O2 and FUZ-O3).

Building definition and Artificial Crop Protection Structures (ACPS) and Crop Support Structures (CSS)

HortNZ seek clarity around the regulatory framework for managing two common structural elements that support horticultural production systems; Artificial Crop Protection Structure (ACPS) and Crop Support Structures (CSS).

These are structures that are fixed to the land and are not partially or fully roofed – on the assumption that the material used is permeable. Due to variable nature of these structures e.g some have permanent cover, some don't. there is uncertainty with the implementation of the National Planning Standards definition of building; HortNZ seek to ensure that these structures are not inadvertently covered by inappropriate effects standards (e.g. building coverage).

HortNZ's Submissions on proposed New Plymouth District Plan

Consequential amendments and changes be made as a result of changes sought in this submission.

Sub pt	Plan provision	Support/ Oppose	Reason	Decision Sought
Definitions				
1	Agricultural, Pastoral and Horticultural Activities	Support in part	<p>The definition of intensive indoor primary production (defined by the National Planning Standards) does not capture greenhouses, and instead fall under 'primary production'. The reference to 'relies on the productive capacity of land' in this definition creates a regulatory gap for greenhouses, which we consider should be included within the definition of 'Agricultural, Pastoral and Horticultural Activities'.</p> <p>Aircraft may be used may be used intermittently for primary production purposes such as spraying or fertiliser application.</p>	<p>Amend the definition of Agricultural, Pastoral and Horticultural Activities to include greenhouses:</p> <p><i>means the use of land and/or buildings for rural land uses where the primary purpose is to produce livestock, crops and other agricultural produce that relies on the productive capacity of land, and includes:</i></p> <ul style="list-style-type: none"> • <i>agriculture, pastoral/livestock farming, dairying and horticulture (including greenhouses);</i> • <i>storage of products and initial processing of horticultural and agricultural products produced on site;</i> • <i>the storage and disposal of solid and liquid animal waste;</i> • <i>wood lots up to 5ha in area;</i> • <i>domestic animal boarding and breeding;</i> • <i>stock sale yards;</i> • <i>rural research;</i> • <i>farm quarries; and</i> • <i>ancillary structures; and</i> • <i>intermittent use of aircraft for primary production purposes</i>
2	Ancillary Structure	Support	<p>This definition is required as it is referenced in Agricultural, Pastoral and Horticultural Activities, and would appropriately capture activities that form part of these activities (e.g. ACPS or CPS).</p>	Retain as notified
4	New definition - Cultivation	New definition	<p>The definition of earthworks includes an exclusion for cultivation, therefore it is appropriate that cultivation is</p>	Include a definition for cultivation, consistent with the National Planning Standards:

			define in the plan.	<u>Cultivation – means the alteration or disturbance of land (or any other matter constituting the land including soil, clay, sand and rock), for the purpose of sowing, growing or harvesting of pasture or crops.</u>
5	Intensive Primary Production	Oppose	This appears to be a duplication of the term Intensive Indoor Primary Production, which shares the same definition and is defined in the National Planning Standards. The term Intensive Primary Production only appears once in the Plan (Part 3: RPROZ Overview).	Delete definition of 'Intensive Primary Production' (and consequential amendment of Part 3: RPROZ Overview)
	Helicopter landing area	Oppose in part	Helicopters may be used intermittently for primary production purposes such as spraying or fertiliser application. Given the intermittent nature of the activity they should be excluded as helicopter landing areas.	Amend to add the following exclusion: <u>Areas used for intermittent use of aircraft for primary production purposes within the Rural Production Zone</u>
	Noise Sensitive Activities	Support	It is important that noise-sensitive activities are clearly defined in the Plan.	Retain
	Reverse Sensitivity	Support	Reverse sensitivity is an important resource management issue for HortNZ; this definition accurately describes reverse sensitivity.	Retain
	Rural Character	Support	It is important to set clear expectations of rural character, which includes production related activities.	Retain
	Sensitive Activities	Support	It is important that sensitive activities are clearly defined in the Plan. We note that the also notes incompatible activities that are zone-specific. This definition should also include tourist facilities (wider than just visitor accommodation).	Amend to include tourist facilities and cafes.
	New definition –	New		Include a new definition for Artificial Crop Protection structure:

	Artificial Crop Protection structure	definition		<p><u>Open structures that are used to protect crops from damage.</u></p> <p><u>Includes:</u></p> <ul style="list-style-type: none"> • bird netting; and • wind-break netting. <p><u>Excludes:</u></p> <ul style="list-style-type: none"> • greenhouses
	New definition - Crop support structure	New definition		<p>Include a new definition for Crop Support Structure:</p> <p><i>Means open pervious, structures with the primary purpose to provide support for horticultural crops. Crop support structures are stand-alone unattached to any building</i></p>
	New definition – Highly Productive Land	New definition	<p>HortNZ seeks greater guidance and consistency in regard to highly productive land, as there are a range of undefined terms used throughout the plan e.g. 'productive, versatile land' of significance to the district (UFD-24), 'versatile land' (RPROZ-P2), 'productive potential of highly productive soils and versatile rural land' (RPROZ-O3), 'soil productivity, versatility of land' (RPROZ-O6) and 'significant rural production values and/or versatility' (RLZ-O2 and FUZ-O3).</p>	<p>Include a new definition for highly productive land consistent with the direction within the draft NPS HPL.</p> <p>And consequential amendments (to amend terms throughout the plan which refer to productive and/or versatile land and/or soils in UFD-24, RPROZ-P2, RPROZ-O3, RPROZ-O6, RLZ-O2, FUZ-O3).</p>
	New definition – Ancillary rural earthworks	New definition	<p>It is appropriate to provide for typical earthworks and/or land disturbance associated with</p>	<p>Add a definition for Ancillary rural earthworks:</p> <p>Means earthworks or land disturbance associated with Agricultural, Pastoral and Horticultural Activities, including:</p> <ol style="list-style-type: none"> 1. cultivation, land preparation (including establishment of sediment and erosion control measures), for planting and growing operations; 2. harvesting of agricultural and horticultural crops (farming) and forests (forestry); and 3. maintenance and construction of facilities typically associated with Agricultural, Pastoral and Horticultural Activities, including, but not limited to, farm tracks, stock races, silage pits, farm drains, farm effluent ponds, feeding pads, fencing and sediment control measures.

Strategic Direction – UFD (Urban Form and Development)				
	UFD-14	Support	While providing no comment on the appropriateness of these identified growth areas, HortNZ support a framework that promotes co-ordinated urban growth that defines clearly where urban growth is anticipated in the District.	Retain
	UFD-23	Support	HortNZ support the recognition of primary production and rural industry activities being able to operate efficiently and effectively.	Retain
	UFD-24	Support in part	HortNZ support recognition of the need to protect and maintain 'productive, versatile land', however consider that the terminology used could be more consistent and no policy guidance as to what is 'productive versatile land ... of significance to the District'	Retain the objective, but amend to achieve consistent terminology with regard to productive land/versatile land in the Plan. HortNZ seek that the term highly productive land is used to be consistent with the draft NPS-HPL. And consequential amendments to other provisions of the plan.
Sub (Subdivision)				
	SUB-O2	Support in part	It is important to consider highly productive soils at the subdivision stage, as fragmentation and reverse sensitivity can impact on the ability to use this land productively.	Retain objective, but amend to include: <i><u>x. protects or maintains highly productive land that is of significance to the District</u></i>
	SUB-P1	Support in part	Consistent with the Strategic Direction, it is appropriate to include reference to versatile land (or highly productive land, as per HortNZ submission)	Retain policy, but amend to include: <i><u>x. protects or maintains highly productive land that is of significance to the District</u></i>
	SUB-P8	Support in part	It is appropriate to consider reverse sensitivity at the urban/rural	Amend to include:

			interface, which would likely be altered as a result of greenfield subdivision.	<i>x. Managing potential reverse sensitivity effects at the urban/rural interface</i>
	SUB-P10	Support	HortNZ support the outcome articulated within clause (3) of SUB-P10	Retain SUB-P10(3).
	SUB-P12 and P13	Support	HortNZ support the policy recognition of reverse sensitivity and use of separation from zone boundaries as a tool to manage potential effects.	Retain
	SUB-P14	Support	HortNZ support the recognition that the continued and efficient operation of rural activities in the Rural Production Zone, form part of the rural character and amenity.	Retain
	SUB-R4	Support in part	HortNZ support reverse sensitivity effects on rural activities being a matter over which control is reserved.	Amend to read: <i>Management of potential reverse sensitivity effects on existing land uses, including network utilities, rural activities or significant hazardous facilities, and <u>highly productive land</u>.</i>
	SUB-R5	Support	HortNZ support reverse sensitivity effects on rural activities being a matter over which control is reserved.	Retain
NU (Network Utilities)				
	NU-O3	Support in part	Maintenance and repair or upgrading is important but a test of not constrained or compromised by other activities is a very high test, especially where the activity is undertaken on private land.	Amend: <i>The efficient operation, maintenance, repair or upgrading of network utilities is not constrained or compromised by other activities <u>to the extent reasonably possible</u>.</i>
	NU P6	Support in part	Clause 6 seeks to maintain ongoing access to conductors and support	Amend (5):

			structures for maintenance and upgrading works. Where the National Grid You and Corridor are located on private land access should be by negotiation with the landowner. Access should not be locked into a specific location but should have the flexibility to be altered to provide for the land use activity in the National Grid Yard or Corridor.	maintains ongoing access to conductors and support structures for maintenance and upgrading works <u>retain existing level of access to conductors and support structures in agreement with the landowner</u>
	NU P8	Support	HortNZ supports reliance on NZECP34:2001	Retain
	NU-R3	Support in part	HortNZ seeks that any alterations to conductors retain the same voltage unless the line was constructed to operate at a higher voltage. An increase in voltage can adversely affect landowners as the requirements in NZECP34:2001 would require larger setbacks and separation distances. Therefore such increases should not be able to be undertaken as a permitted activity with no involvement of the affected landowner.	Amend NU-R3 by adding: <u>any alterations to conductors retain the same voltage unless the line was constructed to operate at a higher voltage</u>
	NU –R22	Support in part	A matter of discretion should include effects on affected landowners	Amend by adding an additional matter of discretion: <u>Effects on affected landowners</u>
	NU-R32	Support in part	The limitation on irrigation infrastructure in inappropriate	Delete in 1c) and 2a) : other than for the reticulation and storage of water in canals, dams or reservoirs for irrigation purposes
	NU-R33	Support in part	Provision should be made in NU-R33 3) for artificial crop protection structures which comply with clause 2.4.1 of NZECP	Add to NU-R33 3)d) OR is a structure where Transpower has given written approval in accordance with clause 2.4.1 of NZECP34:2001.
	NU-R39	Support in part	The intent of the note that provides for normal agricultural, horticultural or domestic cultivation activities is supported however it would be	Amend NU-R39 to include the exclusions in the Note to within the rule

			preferable for the exclusion to be in the rule rather than an advice note.	
EW (Earthworks)				
	EW-R1	Support in part	It is not considered necessary for construction or maintenance of fences, poles, piles or service connections to be subject to cut depth limitations.	Amend: <i>1. all Earthworks Effects Standards are complied with (<u>excluding EW-S2 - Maximum cut depth or fill height, which does not apply to these activities</u>)</i>
	EW-R2	Support in part	It is unclear whether this definition applies to cultivation (for which HortNZ has sought a definition be included). HortNZ seek that cultivation be excluded from this rule; the effects standards would not be appropriate or practical for cultivation.	Amend: <i>Land disturbance for gardening, planting of any vegetation and/or the construction or maintenance of garden amenities (<u>excluding cultivation</u>)</i>
	EW-X	New rule	Land disturbance activities associated with horticulture (including cultivation and land preparation) can be adequately managed through the application of good management practice to achieve good environmental outcomes. 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)).	Insert a permitted activity rule for Ancillary Rural Earthworks, that are not subject to the Earthworks Effects Standards.
	EW-R11	Support in part	It is appropriate to provide for construction, maintenance and repair or upgrade of vehicle tracks as a permitted activity.	Retain, subject to any consequential amendments required as a result of HortNZ's submission on Ancillary Rural Earthworks.

	EW-X	New Permitted Activity Rule	<p>HortNZ seeks that the District Plan include provisions for the management of incursions of unwanted organisms under the Biosecurity Act because it has become apparent that District Plans can be a regulatory hurdle to rapid response to such incursions.</p> <p>While biosecurity is generally managed under the Biosecurity Act, there is an interface with the RMA so the Plan has a role to play in respect of managing biosecurity risks.</p> <p>There are a range of threshold levels for biosecurity incursions and it is only when a biosecurity emergency is declared by the Minister that the Biosecurity Act overrides the RMA provisions. In other situations a declaration may be made by the Chief Technical Officer of Ministry of Primary Industries (MPI). In such a declaration the regional and district plan rules need to be met in terms of disposal of infected material and given the urgency required it is not practical to have to obtain resource consent. Therefore provisions are included in the Plan to enable disposal or treatment of material to be undertaken in response to a biosecurity incursion.</p>	<p>Amend to include a permitted activity rule:</p> <p><u><i>Earthworks for burying 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.</i></u></p> <p>And consequential amendments to the rule and policy framework: For vegetation clearance, a permitted activity rule: <u><i>Removal 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.</i></u></p> <p>Insert an objective relating to biosecurity: <u><i>To minimise the risk of biosecurity incursions in the district and enable response to any biosecurity incursions.</i></u></p> <p>Insert a policy relating to biosecurity: <u><i>Enable disposal of infected material for biosecurity purposes and treatment of areas to manage incursions of unwanted organisms.</i></u></p>

Noise				
	Noise-S1 (2) Maximum noise levels-zone specific	Oppose in part	<p>The whole rural zone is a working production environment and the same noise limit should apply throughout.</p> <p>HortNZ is concerned that a new dwelling constructed in the RPROZ would result in reverse sensitivity effects by resulting in a reduced noise limit.</p>	<p>Subject to Zone standards Amend, as follows:</p> <ol style="list-style-type: none"> 1. <i>Noise generated by any activity shall not exceed the following noise limits at any point within the notional boundary of any noise sensitive activity on any other site in the Rural Production Zone and at any point within any site in the Rural Lifestyle Zone, Māori Purpose Zone, Future Urban Zone and/or any Residential Zone:</i> <ol style="list-style-type: none"> a. 7am to 7pm – 50 dB LAeq(15 min). b. 7pm to 10pm – 45 dB LAeq (15 min). c. 10pm to 7am – 40 dB LAeq (15min). d. 10pm to 7am – 70 dB LAmix <p>OR amend to exclude audible birds scarers include a permitted activity rule specific to these, as follows:</p> <p><i>An audible bird scaring device:</i></p> <p><u>(a) Shall only be operated from half an hour before sunrise to half an hour after sunset.</u></p> <p><u>(b) Shall be set to operate at no greater frequency than 12 times in any period of one hour, that is 12 single discharges or four groups of three discharges.</u></p> <p><u>(c) Shall not be operated for any continuous period exceeding two seconds.</u></p> <p><u>(d) Shall only be operated when the horticultural crop is at risk from bird damage.</u></p> <p><u>(e) Shall not exceed 65dB ASEL at the notional boundary of any dwelling in the Rural Zone or at the boundary of any Residential Zone (excluding any dwelling/s located on the same site as the device is being operated).</u></p> <p><u>(f) Where those persons who experience noise levels over 65dB ASEL as described in (e) above, have provided written approval to Council then the activity shall be permitted.</u></p> <p>Where this rule cannot be met, include a restricted discretionary activity rule with the following matters of control:</p> <ul style="list-style-type: none"> • location of audible bird scaring device • Noise levels at the notional boundary of adjoining properties

				<ul style="list-style-type: none"> Number of shots per event
LRZ - Low Density Residential Zone				
	LRZ-S6 Minimum building setbacks		Consistent with the RLZ zone provisions, it would be appropriate to include a larger setback from a Rural Zone.	<p>Amend the matters of discretion of the minimum building setback effect standard is not achieved to include:</p> <p><i>x. Potential reverse sensitivity effects on agricultural, pastoral and horticultural activity or highly productive land, where the boundary is adjacent to the Rural Production Zone</i></p>
Rural Production Zone (RPROZ)				
	RPROZ-O2 and O3	Support	These objectives are important for upholding the character and productive potential of the RPROZ	Retain as notified
	RPROZ-O4	Support	Support recognition and character of rural character in RPROZ	Retain
	RPROZ-O5	Support	Support recognition of reverse sensitivity	Retain
	RPROZ-O5	Support in part	Support inclusion of soil productivity and versatility of land, however seek consistent terminology throughout the Plan.	Amend to refer to highly productive land.
	RPROZ-O7	Support in part	Support recognition of reverse sensitivity in this objective, but seek to further quantify	<p>Amend, as follows:</p> <p><i>Sensitive activities are designed and located to avoid, remedy or mitigate adverse reverse sensitivity effects and/or conflict with primary production, such that rural activities and the productive potential of highly productive land is not constrained.</i></p>
	RPROZ-P2	Support	<p>These objectives are important for upholding the character and productive potential of the RPROZ</p> <p>HortNZ support the recognition that rural industry being potentially compatible activities, recognising the large scope of activities which this</p>	Retain RPROZ-P2, particularly (3) and (6) and the listed of potentially compatible activities (subject to amendment through further submission)

			could encompass, the matters (1) to (6) are relevant to assess against.	
	RPROZ-P3	Support	Support clear direction this provides with regard to incompatible activities	Retain (subject to amendment from further submission)
	RPROZ-P4	Support	Support use of setback as a tool and specific reference in policy frameworks	Retain
	RPROZ-P6	Support	HortNZ seek to include 'existing' to account for potential reverse sensitivity effects once (rural) activities are stabilised.	Amend <i>3. sufficient separation from <u>existing</u> sensitive activities by distance and/or topography to avoid risk to people, property and the environment;</i>
	RPROZ-P7	Support	HortNZ support the reference to setback distances and design mitigation measures as tools for managing reverse sensitivity	Retain
	RPROZ-R1	Support	It is appropriate that these activities would be permitted within the RPROZ. However, as an ancillary structure, ACPS's and CPS's would be part of this activity, however should not be subject to setbacks, height in relation to boundary or maximum gross floor area effects standards.	Retain, but amend as follows: <i>1. all Rural Production Zone Effects Standards are complied with (except for <u>Artificial Crop Protection Structures or Crop Support Structures, RPROZ-S2 Minimum building setbacks, RPROZ-S4 Height in relation to boundary, and RPROZ-S6 Maximum gross floor area do not apply</u>)</i> OR amend to clarify that ACPS and CSS are not buildings
	Matters over which discretion is restricted in RPROZ-R14 – R22	Support in part	Reserve sensitivity can also extend to horticultural activities.	Amend to include agricultural, pastoral and horticultural activities: <i>Location and sensitivity to <u>Agricultural, Pastoral and Horticultural Activities, intensive indoor primary production, mining, quarries and/or oil and gas activities and whether any conflict, reverse sensitivity effects and/or increased risks to people, property and the environment arise</u></i>
	RPROZ-S2 Minimum building setbacks Matters of	Support in part	Reverse sensitivity is a key issue that should be considered if setback effects standards are not met.	Retain setbacks from agricultural, pastoral and horticultural activity buildings and structures (excluding rural industry activities): 10m Amend the matters of discretion of the minimum building setback effect

	discretion			standard is not achieved to include: <i><u>x. Potential reverse sensitivity effects on agricultural, pastoral and horticultural activity or highly productive land</u></i>
	RPROZ-S3 Shelter Belts	Oppose in part	The wording of the effects standard is unclear. HortNZ seek to ensure that shelter belts used as mitigation of spray drift are not unduly restricted by this standard.	Amend to clarify the effects standard and ensure it does not unreasonably restrict shelter belts on horticultural properties.
	RPROZ-S6 – maximum gross floor area	Oppose in part	A 250m ² restriction applying to ‘all other buildings’ seems unreasonable and unnecessary in a Rural Production Zone.	Delete (5), which specifies a 250m ² limit per site. Or amend to exclude buildings associated Agricultural, Pastoral and Horticultural Activities
Rural Lifestyle Zone (RLZ)				
	RLZ-P2	Support	We support the recognition of the potential for RS effects on activities in the rural production zone	Retain (5)
	Rural Lifestyle Zone effects standards RLZ-S2 Minimum building setback	Support in part	We support the recognition of the potential for RS effects, seek this is included as a matter of discretion	Retain setbacks from rural zones as an effect’s standard. AND Amend the matters of discretion of the minimum building setback effect standard is not achieved to include: <i><u>x. Potential reverse sensitivity effects on agricultural, pastoral and horticultural activity or highly productive land in a Rural Zone</u></i>
FUZ (Future Urban Zone)				
	FUZ-O1, O2	Support	HortNZ support growth in defined areas and comprehensive structure planning, particularly for development which alters the location of the urban/rural boundary	Retain
	FUZ-P7	Support in part	It is important that structure planning takes into account potential reverse sensitivity effects that can occur at a	Amend (1) to include specific reference to the need to address and manage reverse sensitivity at the urban/rural interface.

			new urban/rural boundary.	<p><i>“Require that any structure plan prepared for the purposes of enabling Future Urban Zone land to transition into urban zoned land, provides for comprehensive, coordinated and efficient development and that it addresses, as appropriate, the following matters:</i></p> <ol style="list-style-type: none"> <i>1. the impact on existing activities and the ability to manage any potential conflict between existing activities and future activities as the area transitions to an urban area, <u>including the potential for reverse sensitivity effects at the urban/rural interface,</u>”</i>
	FUZ-S2 Minimum building setbacks – Matters of discretion if compliance is not achieved	Support in part	Reverse sensitivity is a key issue that should be considered if setback effects standards are not met.	<p>Amend the matters of discretion of the minimum building setback effect standard is not achieved to include:</p> <p><i><u>x. Potential reverse sensitivity effects on agricultural, pastoral and horticultural activity or highly productive land in a Rural Zone</u></i></p>

