

NZ PORK



SUBMISSION ON

**Proposed Central Hawke's Bay District
Plan**

3 August 2021

To: Central Hawke's Bay District Council

SUBMITTER: New Zealand Pork Industry Board



Introduction

The New Zealand Pork Industry Board (NZPork) welcomes the opportunity to submit on the Proposed Central Hawke's Bay District Plan.

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

NZPork 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.

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1. The New Zealand Pork Industry

NZ Pork is a statutory Board funded by producer levies. It actively promotes "100% New Zealand Pork" to support a sustainable and profitable future for New Zealand grown pork. The Board's statutory function is to act in the interests of pig farmers to help attain the best possible net on-going returns while farming sustainably into the future.

The New Zealand pig industry is a highly productive specialized livestock sector, well integrated within New Zealand's primary production economic base. It draws on both downstream and upstream inputs and economic activity from New Zealand's rural sector including feed inputs, equipment and animal health supply, transport, slaughterhouse facilities plus further processing. Currently New Zealand's pig farmers produce around 45,350 tonnes of pig meat per year for New Zealand consumers. This represents around 38% of pig meat consumed by the domestic market, with the other 62% provided by imported pig meat from a range of countries. Nationally there are less than 100 commercial pork producers, comprising a relatively small but significantly integrated sector of the New Zealand agricultural economy. In 2007 it was estimated by the NZ Institute of Economic Research that the total economic activity associated with domestically farmed pigs was approximately \$750 million per annum.

Pigs' needs are unique compared to other farmed animals. They need constant access to shelter, a balanced diet and regular care and supervision. To meet these needs, New Zealand's commercial pig farmers have adopted a range of farming methods. Many farmers prefer indoor farming because they believe it allows them to provide the best care for the modern animal by allowing them to



carefully manage their environment. Approximately 55% of New Zealand's pigs are farmed in this way.

The other 45% of New Zealand's commercial breeding herd is farmed outdoors. Outdoor breeding (also called free-farmed pork) can only occur in a moderate climate with low rainfall and free-draining soil conditions. In New Zealand, these conditions are mostly found in Canterbury. In most free-farmed systems, sows are farmed in groups in paddocks during gestation with huts for shelter and shade. When sows farrow, they are provided with individual, dry and draught-free huts with straw for warmth. A variety of housing systems are then used to house pigs after weaning, including indoor barns or open-air sheds.

New Zealand pork producers are facing several economic, social and environmental challenges in order to remain viable. The contribution of imported pork to New Zealand's total pork consumption has increased significantly in recent years, placing further demands on producers who have responded by developing increasingly efficient systems. Currently, nearly all pork produced in New Zealand is consumed locally and makes up less than 40% of the domestic market supply. The Central Hawke's Bay is an important district for pig farming, using a mixture of both indoor and outdoor farming systems that support New Zealand's food production system.

The New Zealand pork industry is dedicated to producing environmentally sustainable pork. NZPork is proactive in supporting farmers to reduce environmental impacts through investing producer funds into research, innovation and technologies in a range of environmental areas including nutrient management, greenhouse gas emission reductions and by-product reuse. Pig farmers in New Zealand have a firm grasp of environmental issues and demonstrate a high level of innovation and environmental stewardship. The New Zealand pork industry has committed significant time and resource to Sustainable Farming Fund projects centred on environmental initiatives, including development and implementation of Environmental Guidelines (attached) and Nutrient Management Guidelines. However, profit margins for the industry remain tight and dialogue with farmers has indicated that compliance costs and uncertainty into the future are key issues.

2. Summary of submission

An overview of key points of feedback to the proposed plan is provided below. Specific submission points are detailed in Section 3.

2.1 Intensive Farming in the GRUZ and RPROZ

NZPork is broadly supportive of the provisions for intensive farming in the GRUZ and RPROZ, while seeking some particular changes to definitions and rules to assist with plan interpretation and administration.

The definition of Intensive Primary Production should be supported by the addition of definitions to cover the typical range of primary production activities that can be deemed intensive being indoor and outdoor primary production activities.



Commercial boarding and/or breeding of cats, dogs and other domestic pets is not a *Primary Production* activity (as per National Planning Standards and Proposed Plan). The provides a different activity status for these activities and they should be deleted from the definition.

For clarity and plan administration a definition of Extensive Pig Farming should be included and reference to industry codes of practice for ground cover maintenance (refer attached Good Management Practices for Outdoor Pig Farming).

NZPork oppose the matters of control. The proposed matters of control are confusing and it is not clear in the objective and policy framework or section 32 why these have been applied to Intensive Primary Production.

NZPork oppose the non-complying activity status for intensive primary production activities where minimum setbacks are not achieved. The activity status is unnecessarily onerous when a discretionary activity status provide robust effects and policy assessment in circumstances of non-compliance.

NZPork is concerned that the permitted activity status of sensitive activities in the GRUZ and RPROZ could lead to adverse outcomes for primary production activities, including intensive operations. In the proposed plan, visitor accommodation, conference facilities and educational facilities are permitted. However, the nature of these as sensitive activities means conflict with primary production activities are likely, and their PA status is not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response.

NZPork submits that a more restrictive activity status for sensitive activities be adopted in the GRUZ and RPROZ.

2.2 Mobile Pig Shelters

NZ Pork is concerned that Mobile Pig Shelters (being partially or fully-roofed) would fall within the definition of building and structure. The plan should provide relief from the rules for buildings and Structures as they might apply to mobile pig shelters. These shelters are a critical part of the pig farming system and can be of a variety of forms as shown below.

Dry Sow Group Accommodation Recommended Practice

Dry sow housing is generally designed to accommodate groups of breeding animals. These come in a variety of forms as shown in the illustrations below. Note trees for shelter and the huts are facing away from the predominant wind direction.



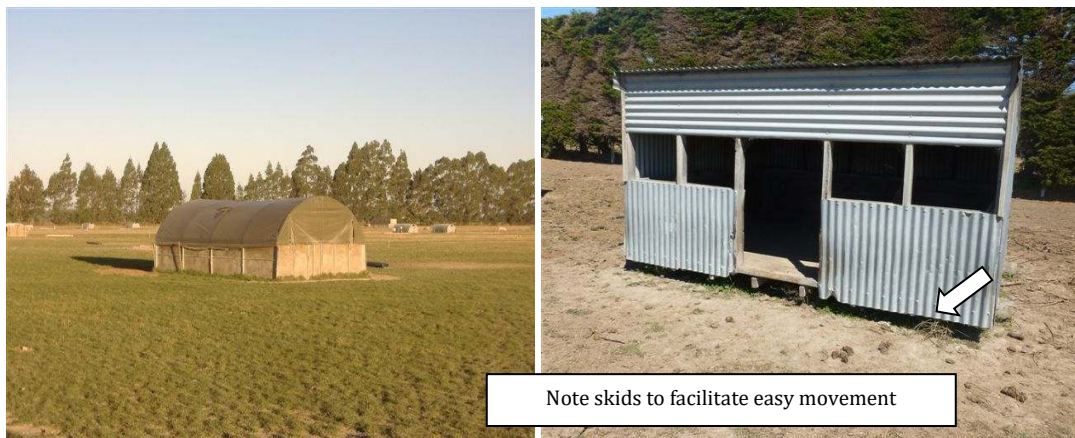


Photo 1-6: Variations in dry sow housing designs





Photo 7: Interior of a dry sow house with wooden floor

Weaner Accommodation

The younger the pig, the more vulnerable they are and the more critical are their accommodation needs. They must be kept in a clean, warm, dry, draught free environment subject to minimal variations in temperature. Straw based systems work well.



Photos 8 and 9: Weaner Accommodation

Photos 8 and 9 demonstrate an example of suitable weaner accommodation: Photo 8 (left) shows separate straw bale draught free sleeping area, under a 'kennel' roof for newly weaned pigs. Also note ventilation flap at back and drinkers in left foreground. Photo 9 (right) shows weaner pigs a few weeks later with the straw bale sleeping area broken down but the 'kennel' roof retained in the sleeping area.

Other considerations:

- Where possible pigs should be kept in stable groups of familiar animals through out the growing period.



- The use of moveable weaner 'boxes' constructed of plywood is one approach to provide quality accommodation. Weaner boxes are generally constructed with a low roof and are well insulated.
- Ensure water supply is sited outside of the sleeping area to prevent flooding of the bedding.



Photo 10: An example of a low roofed box type accommodation suitable for weaners

Grower accommodation

As pigs grow, they become more tolerant of changes in the environment and accommodation requirements are less rigorous. However, it is essential they have a warm dry, draught free sleeping area large enough to accommodate all the pigs in a paddock together.



Photo 10: Accommodation suitable for free range growers

Photo 11: Example of access for free range growing pigs to fodder beet crops from a shelter



A popular design is a 'kennel' area constructed in a general-purpose building. A false roof or lid is positioned over the pigs sleeping area to create a warm, dry and draught free environment.

2.3 Earthworks and Biosecurity-related activity

The viability of the New Zealand pork industry is dependent on the benefits conveyed upon it from the absence of many viral pathogens which are common in much of the rest of the world. Any biosecurity incursions within the industry must be able to be managed quickly and efficiently to contain spread. Not all biosecurity incursions would constitute a biosecurity emergency that would trigger provisions in the RMA or the Biosecurity Act to override consenting requirements. The intersect with the District Plan may well be in a response that requires burial of animal carcasses. The Regional Plan is in place to manage discharges from such activities but constraints on earthwork activity (volume and area) may inhibit a timely, efficient, and effective response.

NZPork seeks an amendment to the definition of Ancillary Rural Earthworks to include the burying of material infected by unwanted organisms as declared by the Ministry for Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993'. This would allow farmers to undertake earthworks related to burying material in the event of a biosecurity incident as a permitted activity.

2.4 Strategic Direction

NZPork supports the clear Strategic Direction and inclusion of Strategic Objectives, Policies and Methods that recognise and respond to the resource management issues associated with rural land.

The proposed plan framework and cascade to the provisions addressing intensive primary production would be improved by:

- the value of the activity,
- that intensive primary production activities (both indoor and outdoor) may, by locational necessity, be situated on highly productive land where there are economic and operational benefits associated with concentrating such enterprises in specific rural localities.

2.5 Workers accommodation.

Farming pigs is very different from farming other livestock. Stockpersons are far more intimately involved with the care of pigs than other livestock. Pigs have a greater need for shelter and their social and dietary requirements are more complex than sheep and cattle. Animal care is a daily responsibility, as pigs are not like ruminants which derive their nutrition from grass: pigs are monogastric like humans, and require a balanced diet fed daily. As such, providing accommodation on site for workers is an important component of many commercial pig farming operations, which often require the onsite provision of farm workers accommodation to provide onsite farm assistance, animal husbandry and security.



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NZPork notes that there are no specific provisions for worker accommodation in the proposed plan. The provision of a minor residential unit with 100m² limitation and requirement that the minor residential unit is no more than 50m from the principal residential unit do not support a viable farm workers accommodation. NZPork seeks the inclusion of a rule structure for workers' accommodation.



3. Specific submissions on the PCHBDP

Provision to which our submission relates:	Support/ Oppose/ Amend	The decision we are seeking from Council:	Reasons:
PART 1 – INTRODUCTION AND GENERAL PROVISIONS			
INTERPRETATION			
Definitions			
Ancillary Buildings and Structures (Primary Production)	Amend	<p>Provide a definition and rule structure that provides relief from the rules for buildings and structures as they might apply to mobile pig shelters.</p> <p>Add mobile pig shelters to the definition of Ancillary Buildings and Structures (Primary Production).</p>	Mobile Pig Shelters (being partially or fully roofed) would fall within the definition of building and structure. The plan should provide relief from the rules for buildings and structures as they might apply to mobile pig shelters.
Ancillary Rural Earthworks (Primary Production)	Amend	<p>Amend the definition of Ancillary Rural Earthworks to include provisions for biosecurity related activity as a permitted activity.</p> <p><u>'the burying of material infected by unwanted organisms as declared by the Ministry for Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993'</u></p>	<p>NZPork seeks an amendment to this definition to include the burying of material infected by <u>unwanted organisms</u> as declared by the Ministry for Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993'. This would allow farmers to undertake earthworks related to burying material in the event of a biosecurity incident as a permitted activity.</p> <p>Not all biosecurity incursions would constitute a biosecurity emergency that would trigger provisions in the RMA or the Biosecurity Act to override consenting requirements. The level of response required will depend entirely on the nature and scale of the incident. To date, the biosecurity emergency powers under the Biosecurity Act have never been used. In addition, any exemption granted under the Act will be short-term only in nature. After the exemption ends, the provisions of the RMA apply to the same extent as those provisions would have applied but for the exemption. This creates uncertainty as to whether resource consent would retrospectively be required for the activity, and as</p>

			<p>such may still limit the scope of the response for the landowner to what is provided for under the district plan.</p> <p>Biosecurity incidences which do not result in a declared emergency must therefore be managed to regional and district council plan requirements, including limitations on earthworks which may hinder any urgent response activity required to adequately address the incursion.</p> <p>This is not a new matter and other District Plans recognise the issue and provide an appropriate resource management response. The viability of the New Zealand pork industry is dependent on the benefits conveyed upon it from the absence of many viral pathogens which are common in much of the rest of the world (porcine reproductive and respiratory syndrome virus, transmissible gastroenteritis, classical swine fever, African swine fever, swine influenza). Any incursion of new pathogens into the industry potentially jeopardises pork export marketing opportunities as well as directly creating financial and welfare hardships on New Zealand farms from the production consequences of these diseases. In addition, pigs have been proven to be important 'amplifier' hosts for foot-and-mouth disease (FMD), which has never occurred in New Zealand. If FMD did occur, it would have very serious consequences for the country's major dairy and meat export industries.</p> <p>Any biosecurity incursions within the industry must be able to be managed quickly and efficiently to contain spread. The intersect with the District Plan may well be in a response that requires burial of animal carcasses. The Regional Plan is in place to manage discharges from such activities but constraints on earthwork activity (volume and area) may inhibit a timely, efficient, and effective response.</p> <p>As such, NZPork seeks that the definition of Ancillary Rural Earthworks include provisions for biosecurity related activity.</p>
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<p>Intensive Primary Production</p>	<p>Amend</p>	<p>Support the retention of a definition of Intensive Primary Production where this is supported by the addition of definitions to cover the typical range of primary production activities that can be deemed intensive.</p> <p><u>Intensive Primary Production</u> means any activity defined as intensive indoor primary production or intensive outdoor primary production.</p> <p><u>Intensive Indoor Primary Production</u> (as per 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.</p> <p><u>Intensive Outdoor Primary Production</u> means any primary production activities involving the keeping or rearing of livestock (excluding calf-rearing for a specified time period), that principally occurs outdoors, which by the nature of the activity, precludes the maintenance of pasture or ground cover. Excludes Extensive pig farming.</p> <p><u>Extensive pig farming</u> means the keeping of pigs outdoors on land at a stock density which ensures permanent vegetation cover is maintained and in accordance with any relevant industry codes of practice, and where no fixed buildings are used for the continuous housing of animals.</p>	<p>The definition of Intensive Primary Production should be supported by the addition of definitions to cover the typical range of primary production activities that can be deemed intensive - this being both indoor and outdoor primary production activities.</p> <p>Commercial boarding and/or breeding of cats, dogs and other domestic pets is not a <i>Primary Production</i> activity (as per National Planning Standards and Proposed Plan). The provides a different activity status for these activities and they should be deleted from the definition.</p> <p>For clarity and plan administration a definition of Extensive Pig Farming should be included and a reference to industry codes of practice for ground cover maintenance (refer attached Good Management Practices for Outdoor Pig Farming).</p>
<p>Reverse Sensitivity</p>	<p>Support</p>	<p>Retain definition as proposed.</p>	<p>Support clarity being provided in the plan by defining reverse sensitivity.</p>



Sensitive Activity	Amend	Amend the definition of sensitive activity to cover other activities that are equally sensitive to the effects of primary production in the rural zones. Eg: <ul style="list-style-type: none"> • Camping grounds • Community facilities • Commercial activities • Healthcare facilities 	Oppose the narrow definition of sensitive activity which does not cover other activities some of which are proposed to be permitted in the RPROZ and GRUZ and are equally sensitive to the effects of primary production.
Wetland (Natural) / Natural Wetland	Amend / Oppose	The definition should align with that of the National Policy Statement for Freshwater Management 2020.	The definition should align with that of the National Policy Statement for Freshwater Management 2020.
<u>Workers Accommodation</u>	Amend / Oppose	Add new definition as follows: <u>Workers' accommodation:</u> <u>Means a residential unit for people whose duties require them to live on-site, and in the rural zones for people who work on the site or in the surrounding rural area. Includes farm managers, workers and staff.</u>	Oppose the lack of specific provision for workers accommodation.

PART 2 – DISTRICT-WIDE MATTERS

STRATEGIC DIRECTION

RLR – Rural Land Resource

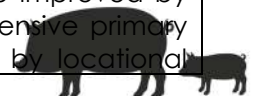
Introduction	Amend	Amend Introduction as follows: Land based <u>Primary production, including intensive primary production,</u> underpins the economic, social, and cultural well-being of the Central Hawke's Bay District, and the District's rural land resource is important for sustaining this production. Rural production and processing/manufacturing together accounts for just over half of the District's total GDP and around half of the District's employment (based on Stats NZ 2012 figures). Central Hawke's Bay accounts for approximately 40% of the total pastoral	Support the clear Strategic Direction and inclusion of Strategic Objectives, Policies and Methods that recognise and respond to the resource management issues associated with the rural land resource. Importantly, it needs to be recognised that by definition, primary production is <u>any</u> agricultural activity and that includes intensive primary production activity (indoor and outdoor). Intensive and extensive outdoor primary production often relies on the rural land resource noting, that in the case of extensive outdoor pig farming this will typically occur on flat, free draining land capable of sustaining ground cover because of the productive capability for grass growth.
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		and associated cropping land in the Hawke's Bay Region ^[1] .	<p>Intensive indoor primary production relies on the broader resources of the rural environment including feed grown on and offsite as well as the activity space and separation the rural environment provides from sensitive activities. This is recognised in the National Planning Standards zone descriptions.</p> <p>General rural zone: <i>Areas used predominantly for primary production activities, including intensive indoor primary production. The zone may also be used for a range of activities that support primary production activities, including associated rural industry, and other activities that require a rural location.</i></p> <p>Rural production zone: <i>Areas used predominantly for primary production activities that rely on the productive nature of the land and intensive indoor primary production. The zone may also be used for a range of activities that support primary production activities, including associated rural industry, and other activities that require a rural location.</i></p> <p>The proposed plan framework and cascade to the provisions addressing intensive primary production would be improved by recognising the value of the activity and that intensive primary production activities (indoor and outdoor) may, by locational necessity, locate on highly productive land where there are economic and operational benefits associated with concentrating such enterprises in specific rural localities.</p>
RLR-O2 Objective	Amend	<p>Amend Objective RLR-O2 as follows:</p> <p>The primary production role and associated amenity of the District's rural land resource <u>environment</u> is retained, and is not compromised by inappropriate subdivision, use and development.</p>	It is not the amenity of the <i>land resource</i> that is to be retained – rather the amenity of the <i>rural environment</i> that is characterised by a range of factors including primary product activities that rely on the rural land resource and location aspects to operate.
RLR-P5 Policy	Support	<p>Retain Policy RLR-P5 as proposed:</p> <p>To enable primary production and related activities to operate in rural areas in</p>	The policy directly supports the RLR objectives in particular RLR-O2.



		accordance with accepted practices without being compromised by other activities demanding higher levels of amenity.	
RLR-M1 Method	Amend	<p>Amend RLR-M1 Area-Specific Provisions as follows:</p> <p>GRUZ – General Rural Zone: The General Rural Zone encompasses the bulk of the District's rural land. This area is suitable for a wide range of <u>primary production</u> activities (<u>including intensive primary production</u>) to occur, that can require exclusive areas of land and establishes the flexibility for landowners to identify opportunities to innovatively utilise the resources of the area. Controls in this Zone are tailored to provide flexibility for landowners.</p> <p>RPROZ – Rural Production Zone: The Rural Production Zone encompasses the concentration of highly productive land in and around the Ruataniwha and Takapau Plains and Waipukurau, Waipawa and Otane. Standards in this Zone reflect the more intensive nature of <u>primary production</u> activities (<u>including intensive primary production</u>), the increased interface between different land uses and the proximity of the Zone to the urban centres, and the pressures that this places on the soil resource.</p>	The proposed plan framework and cascade to the provisions addressing intensive primary production would be improved by recognising the value of the activity and that intensive primary production activities (indoor and outdoor) may, by locational necessity, locate on highly productive land where there are economic and operational benefits associated with concentrating such enterprises in specific rural localities.
Principal Reasons	Amend	<p>Amend Principal Reasons as follows:</p> <p>The rural environment provides for a range of activities and farm and associated buildings</p>	The proposed plan framework and cascade to the provisions addressing intensive primary production would be improved by recognising the value of the activity and that intensive primary production activities (indoor and outdoor) may, by locational



		that are of a scale to meet the needs of the primary production sector (<u>including intensive primary production</u>). There is a limit on the scale of commercial and industrial activities in the rural environment and beyond the floor area standards outlined within the zones these types of activity should be located within the appropriate zones where the effects can be suitably accommodated.	necessity, locate on highly productive land where there are economic and operational benefits associated with concentrating such enterprises in specific rural localities. The change aligns with the principal reasons for adopting policies and methods stated in the GRUZ and RPROZ.
Anticipated Environmental Results	Support	Retain RLR-AER4 as proposed: <u>A diversity of activity in the rural area.</u>	A diversity of primary production, including intensive primary production must be an anticipated environmental result in the rural area.
UFD – Urban Form and Development			
UFD-02 Objective	Support	Retain UFD-02 as proposed	Support the Strategic Objective that seeks to retain and protect valuable highly productive land from urban development.
UFD-P2 Policy	Support	Retain UFD-P2 as proposed	Support the Strategic Policy that seeks to direct urban development to urban zones.
UFD-P3 Policy	Support	Retain UFD-P3 as proposed	Support comprehensive structure planning while noting that structure planning should directly respond to the rural urban interface and potential conflicts and reverse sensitivity issues.
UFD-M3 Methods	Support	Retain UFD-M3 as proposed.	Support comprehensive structure planning while noting that structure planning should directly respond to the rural urban interface and potential conflicts and reverse sensitivity issues. Support the reference to Policy UD12 of the Regional Policy Statement: <i>Policy UD12 (I)</i> <i>Avoidance, remediation or mitigation of reverse sensitivity effects arising from the location of conflicting land use activities;</i>
SUBDIVISION			
Introduction	Support	Retain introduction as proposed.	Inappropriate subdivision and land use that introduces sensitive elements into the rural environment. Retain the recognition that new sensitive activities established through subdivision could potentially constrain existing uses nearby.
SUB-O4 Objective	Support / Amend	Amend SUB-O4 as follows:	Retain specific subdivision objective that requires avoidance where practicable, or mitigation where avoidance is not

		Reverse sensitivity effects of subdivision on existing lawfully established activities (including network utilities <u>and primary production</u>) are avoided where practicable, or mitigated where avoidance is not practicable.	practicable of reverse sensitivity effects of subdivision on existing lawfully established activities. The reference should be extended to network utilities <u>and</u> primary production activities to follow the policy structure.
SUB-P16 Policy	Amend	Amend SUB-P16 as follows: To avoid where practicable, or otherwise mitigate, potential reverse sensitivity effects of sensitive activities (particularly residential and lifestyle development) establishing near primary production <u>including intensive primary production activities</u> or industrial activities and existing public works.	Avoidance of reverse sensitivity effects of subdivision on existing lawfully established primary production activities should be the principal outcome to achieve.
SUB-S4 Building Platform Standard	Amend	Amend SUB-S4 as follows: 1. For each lot capable of containing a residential dwelling, at least one stable building platform of 30 metres by 30 metres must be identified which is capable of (but is not limited to) containing a dwelling, a vehicle manoeuvring area and any accessory buildings, in compliance with the performance standards and performance criteria for the zone where it is located (including dwelling setbacks applicable to that zone). 2. <u>The building platform shall be setback 400m from the closest outer edge of any paddocks, hard-stand areas, structures, or buildings used to hold or house stock, and wastewater treatment systems</u>	Support the identification of Building Platform as a useful method to assess and address any actual or potential conflicts between the more sensitive lifestyle activity and surrounding primary production where that might be occurring. Consistent with the approach adopted in the Rural Zones to physically separate intensive primary production from sensitive activities and interfaces (GRUZ-S11 RPROZ-S12), and SUB-AM13(2)(c) a reciprocal setback should apply to new Lifestyle Sites that would introduce a sensitive activity into the rural production environment. Notably, upon erection of a residential dwelling, an existing intensive primary production activity would (unreasonably) then be required to meet more restrictive light and noise standards.



		<p><u>used for intensive primary production.</u></p> <p>3. <u>The establishment of a building platform on the same site as the intensive primary production are exempt from this rule requirement.</u></p>	
SUB-AM11 Assessment Matter	Support	Retain SUB-AM11 as proposed.	Support clear assessment criteria.
SUB-AM12 Assessment Matter	Support	Retain SUB-AM12 as proposed.	Support clear assessment criteria.
SUB-AM13 Assessment Matter	Amend	<p>Amend SUB-AM13 as follows:</p> <p>AM13(2)(c) Any lifestyle site proposed within 400 metres of an existing rural production activity <u>primary production activity including intensive primary production;</u></p>	Support clear assessment criteria while noting that SUB-AM13(2)(c) should be translated to a Building Platform standard to avoid sensitive residential activity locating next to existing intensive primary production. Furthermore, the term <i>rural production activity</i> is not defined and should be replaced with defined terms.
GENERAL DISTRICT WIDE MATTERS			
Earthworks			
Introduction	Amend	<p>Amend introduction as follows:</p> <p>Earthworks are an integral part of development, as they prepare land (including the formation of building platforms) to be used for living, business and recreation, and are often essential to the construction of foundations, buildings, and structures. <u>Earthworks are also part of normal agricultural and horticultural practices.</u></p>	To support the provisions relating to Ancillary Rural Earthworks the proposed plan would be improved by noting in the introduction that earthworks are an integral part of primary production activity rather than focusing on development and extractive activity only.
Policies	Amend	<p>Add new policy as follows:</p> <p><u>Enable land disturbance necessary for a range of activities undertaken to provide for people and communities social, economic and cultural well-being, and their health and safety</u></p>	The plan lacks policy support for the methods adopted to enable and manage the effects of Ancillary Rural Earthworks.
EW-R2	Support	Retain EW-R2 as proposed.	Support a permitted activity status and associated standards for ancillary rural earthworks with amendments to the definition of



Ancillary rural earthworks			ancillary rural earthworks to exclude works required for biosecurity purposes.
EW-S2 Extent of Earthworks	Support	Retain EW-S2 as proposed.	Support proposed plans approach to ancillary farming earthworks including no limitation of activity outside of identified overlays/areas.
Light			
Introduction	Amend	Amend the introduction as follows: Artificial lighting enables activities to occur beyond daylight hours, including night time work, <u>primary production</u> and recreation and entertainment activities, and can assist to improve the safety and security of people and property. However, artificial lighting can result in adverse effects on the occupiers and users of adjoining sites and the transport network if not carefully designed due to light spill and glare. If it impacts on residential properties, it can affect people's health and wellbeing, particularly if it causes sleep disturbance.	The introduction would be improved by recognising and enabling artificial outdoor lighting associated with primary production.
LIGHT-O1 Objective	Support	Retain LIGHT-O1 as proposed.	Support the object that provides for activities to use artificial lighting for operational and functional purposes.
LIGHT-P1 Policy	Support	Retain LIGHT-P1 as proposed.	Support the object that provides for activities to use artificial lighting for operational and functional purposes.
LIGHT-S1 Standard	Oppose	Delete the requirement of LIGHT-S1(1)(b)(ii) that between the hours of 2200 and 0700 hours any outdoor lighting must not be used in a manner that it causes added illuminance in excess of 15 lux measured horizontally or vertically (at a height of 1.5m above the ground) at any point along a line measured 20m from any side of a residential unit located on another site within the General Rural or Rural Production Zones.	The provision would only be reasonable in the case of existing residential units noting that the proposed subdivision provisions would introduce Lifestyle Sites adjacent existing primary production activity and constrain an existing rural production activity. Similarly in the case of residential activity, visitor accommodation, community facility, rest home, marae, it would be unreasonable to apply this standard to an existing primary production activity. Existing use rights would not be sufficient to avoid conflict and reverse sensitivity operational constraints.



		Delete the requirement of LIGHT-S1(1)(d) that any outdoor lighting must be so selected, located, aimed, adjusted, and screened so as to direct such lighting away from any residential activity, visitor accommodation, community facility, rest home and marae.	
Noise			
NOISE-03 Objective	Support	Retain NOISE-O3 as proposed.	Retain a resource management framework that sets out to avoid, remedy or mitigate conflict and reverse sensitivity effects arising for existing lawfully established activities as a result of new noise sensitive activities establishing in close proximity to them.
Noise – P3 Policy	Support	Retain NOISE-P3 as proposed.	Retain a resource management framework that recognises that noise associated with agricultural, viticultural and horticultural activities is appropriate for the working nature of the rural environment by exempting it from the noise limits. The operation of noisy equipment is provided for, subject to appropriate controls.
Noise-S5 Specific Activities Exempt from Noise Limits	Support	Retain Noise-S5 as proposed	Support a permitted activity status for activities involving stock, vehicles and mobile machinery associated with primary production.
PART 3 – AREA SPECIFIC MATTERS			
RURAL ZONES			
GRUZ – General Rural Zone			
GRUZ – Introduction			
Introduction	Amend	Amend introduction as follows: The General Rural Zone, which encompasses the largest proportion of the rural area of the District is <u>used primarily for primary production including intensive primary production.</u>	Consistent with the General Rural Zone description of the National Planning Standards, the Introduction would benefit from describing the zone as used primarily for primary production including intensive primary production. The change aligns with the principal reasons for adopting policies and methods stated in the GRUZ.
GRUZ – Issues			
GRUZ-I2	Amend	Amend GRUZ-I2 as follows:	Consistent with the General Rural Zone description of the National Planning Standards, the issue statement would benefit from describing the zone as used primarily for primary production including intensive primary production.



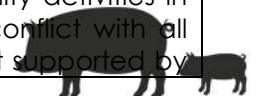
		<p><u>Protecting Rural Amenity, and the Quality of the Rural Environment, and Primary Production Capability.</u></p> <p>Land-based primary production, <u>intensive primary production,</u> and other complementary rural, residential, and recreation-based activities, underpin the social, economic, and cultural wellbeing of the District (particularly for the District's rural communities), but they can also adversely affect rural environmental, cultural, and amenity values <u>or result in conflict that affects primary production capability.</u></p>	<p>The change aligns with the principal reasons for adopting policies and methods stated in the GRUZ.</p>
Explanation	Support	<p>Retain the explanation statement that:</p> <ul style="list-style-type: none"> • The rural environment supports a variety of land based primary production activities including dry stock farming, cropping, dairying, horticulture, plantation forestry, small niche farming land uses, as well as intensive primary production activities and rural service activities. • If increasing density of rural subdivision is allowed in close proximity to existing intensive primary production activities, it can undermine the viability of such activities should complaints about heavy traffic or objectionable noise, dust or odour arise. • Increasing density of subdivision can also intensify pressure on the range of infrastructure servicing (roads and reticulated services), and conflicts 	<p>Consistent with the General Rural Zone description of the National Planning Standards, the issue statement explanation benefits from describing the zone as used primarily for primary production including intensive primary production.</p> <p>This aligns with the principal reasons for adopting policies and methods stated in the GRUZ.</p> <p>Rural subdivision and the introduction of sensitive activities into the rural environment can conflict with primary production including intensive primary production activities.</p>



		with infrastructure services for intensive primary production activities (e.g. if rural roads are expected to be of a higher quality).	
GRUZ – Objectives			
GRUZ -O1	Amend	Amend GRUZ-O1 as follows: The General Rural Zone is predominantly used for primary production activities <u>including intensive primary production</u> and ancillary activities.	Consistent with the General Rural Zone description of the National Planning Standards, the objective must seek to ensure the zone is used primarily for primary production including intensive primary production. This ensures a planning framework link to the relevant policies and in particular GRUZ-P5. The change aligns with the principal reasons for adopting policies and methods stated in the GRUZ.
GRUZ – Policies			
GRUZ -P1	Amend	Amend GRUZ-P1 as follows: To allow <u>enable</u> land-based primary production, <u>intensive primary production</u> and ancillary activities which are compatible with the primary productive purpose and predominant character and amenity of the General Rural Zone.	Consistent with the General Rural Zone description of the National Planning Standards, the policy must seek to ensure the zone supports primarily for primary production including intensive primary production. This ensures a planning framework link to the provisions providing for intensive primary production activities. The change aligns with the principal reasons for adopting policies and methods stated in the GRUZ.
GRUZ-P5	Support	Retain GRUZ-P5 as proposed	Support directive policy to require sufficient separation between sensitive activities and existing primary production and intensive primary production activities, and between new intensive primary production activities and property and zone boundaries, in order to avoid, remedy or mitigate potential adverse effects, including reverse sensitivity and land use conflict.
GRUZ-P7	Support	Retain GRUZ-P7 as proposed.	Support a policy of avoiding reverse sensitivity effects on lawfully established primary production activities.
GRUZ – Rules			
GRUZ-R1 Residential Activities	Oppose / Amend	Amend GRUZ-R1 as follows. 1.a. v.one minor residential unit <u>or one workers' accommodation</u> per site:	Support the provision of one minor residential unit per site less than 20ha and additional dwellings pro-rated to property size. Oppose the limitation of a minor residential unit to a GFA of 100m ² and to be located within 50m from a principal residential unit on



		<p><u>In the case of a residential unit:</u></p> <ul style="list-style-type: none"> a. limited to a maximum gross floor area of 100m² (exclusive of garages, and verandahs less than 20m²); and b. must share vehicle access with the principal residential unit on the site; and c. must be located no further than 50m from a principal residential unit on the site. <p><u>In the case of workers accommodation:</u></p> <ul style="list-style-type: none"> a. <u>limited to a maximum gross floor area of 120m² (exclusive of garages, and decks); and</u> b. <u>must share vehicle access with the principal residential unit on the site.</u> 	<p>a site. This is an impractical limitation on farming units less than 20ha particularly on intensive primary production activities where farm workers (and families) are typically required to live onsite and not in a seasonal working arrangement.</p> <p>While a minor residential unit may have a relationship (e.g. dependent relative) to the principal residential unit) and benefit from locating adjacent the principal residential unit, workers' accommodation typically requires more independence. Workers' accommodation is not practical situated 50m from the principal residential unit and needs to respond to the farm structure and privacy of occupants.</p> <p>As an alternative to the cost and uncertainty of a restricted discretionary activity a permitted activity pathway is an appropriate resource management response for an activity necessary to support primary production and consistent with GRUZ-P2 and GRUZ-O2.</p>
GRUZ-R3 Primary production activities	Support	Retain GRUZ-R3 as proposed.	Support a permitted activity status for primary production activities.
GRUZ-R8 Visitor Accommodation	Oppose	Delete GRUZ-R8 or change activity status.	Oppose the permitted activity status for visitor accommodation in the GRUZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response in this zone.
GRUZ-R9 Commercial Activities	Oppose	Delete GRUZ-R9 or change activity status.	Oppose the permitted activity status for commercial activities in the GRUZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response in this zone.
GRUZ-R10 Community facilities	Oppose	Delete GRUZ-R10 or change activity status.	Oppose the permitted activity status for community activities in the GRUZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by



			an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response in this zone.
GRUZ-R11 Educational facilities	Oppose	Delete GRUZ-R11 or change activity status.	Oppose the permitted activity status for educational activities in the GRUZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response in this zone. The designation process is available for these activities.
GRUZ-R14 Intensive Primary Production Activities	Support in Part / Oppose in Part	Retain GRUZ-R14, 1. Activity Status: CON Amend Matters of Control. Amend GRUZ-R14, 3. as follows: 3. Activity status where compliance with condition GRUZ-R14(1)(c) <u>and/or</u> GRUZ-R14(1)(a) is not achieved: DIS Amend GRUZ-R14, 4. as follows: 4. Activity status where compliance with conditions GRUZ-R14(1)(a) and/or GRUZ-R14(1)(d) is not achieved: NC	Support the controlled activity status for Intensive Primary Production where minimum conditions are met. Oppose the matters of control. The proposed matters of control are confusing and it is not clear in the objective and policy framework or in section 32 why these have been applied to Intensive Primary Production. Eg: <i>Effects on character and amenity of the zone from traffic generated by the proposal and the hours of operation.</i> <ul style="list-style-type: none"> • It is not clear why the effects of traffic generated from Intensive Primary Production on the character and amenity of the rural zone are a relevant concern and what control Council consider might be appropriate that might then not conflict with the viability of the primary production activity. • It is not clear why the effects of the hours of operation from Intensive Primary Production on the character and amenity of the rural zone are a relevant concern and what control Council consider might be appropriate that might then not conflict with the viability of the primary production activity which by their nature are 24/7 activities.



			<p>The method of storage and use of materials associated with the operation of the activity that may generate noxious, offensive, or objectionable odour beyond the site boundary.</p> <ul style="list-style-type: none"> It is not clear what materials (use and storage) are of concern. <p>Methods of disposal of stormwater and wastewater for the activity.</p> <ul style="list-style-type: none"> It is not clear why these discharges are of concern for this activity and not other permitted activities and no section 32 assessment justifying the duplication of stormwater or wastewater related controls under the regional plan. <p>Setbacks from wāhi tapu, wāhi taonga and sites of significance identified in SASM-SCHED3 that are located within the site of the activity.</p> <ul style="list-style-type: none"> It is not clear what effects from this primary production activity require a setback consideration from all wāhi tapu, wāhi taonga and sites of significance identified in SASM-SCHED3. <p>Oppose the non-complying activity status for intensive primary production activities where minimum setbacks are not archived. The activity status is unnecessarily onerous when a discretionary activity status provides robust effects and policy assessment in circumstances of non-compliance.</p>
GRUZ-R16 Camping Grounds	Support	Retain GRUZ-R16 as proposed.	Support the discretionary activity status for Camping Grounds in the GRUZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response.
GRUZ – Standards			



GRUZ-S1 Activity thresholds	Oppose	Delete Restaurants	It is not clear what the activity status for Restaurants is in the GRUZ but these are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response.
GRUZ-S6 Shade of land and roads	Oppose	Delete GRUZ-S6 trees on boundaries.	<p>Oppose the imposition of rules covering trees on all boundaries. Shelterbelts are part of the rural landscape and define the character and amenity of rural environments. Shelterbelts are planted primarily to provide shelter for stock, crops, or non-principal buildings from winds.</p> <p>The rule should be deleted or relate to the sensitivity of the adjoining site both in terms of property size and land use. Where adjoining an existing Lifestyle Site or residential unit, a control may be justified. Where adjoining primary production, it may not.</p> <p>The section 32 does not adequately address what effect on the road is of concern for the Central Hawkes Bay that justifies the resource management approach and why if this was a sound resource management response there is not national consistency. The rule imposes a control on trees forming a continuous line for a distance of more than 20 metres. It is not clear in the s32 why 20m is a trigger point for an issue of shading a road.</p>
GRUZ-S11 Setback from Existing Intensive Primary Production Activities	Support / Amend	<p>Amend GRUZ-S11 as follows:</p> <p>Minimum setback of buildings from any buildings or enclosure housing animals reared intensively, or from organic matter and effluent storage, treatment and utilisation associated with intensive primary production activities, is 200 400 metres.</p>	Support the requirement for a setback of sensitive activities from existing intensive primary production activities. The setback should be increased to reflect the assessment criteria for subdivision in the rural zones: SUB-AM13(2)(c).
GRUZ – Assessment Matters			
GRUZ-AM2 Shading of Land and Roads	Oppose	Delete GRUZ-AM2 as notified.	The rule is titled Shading of Land and Roads but the criteria extend to the health of vegetation or stock, fire risk, windfall, and root damage.



			<p>How planting within the setback area can adversely affect the health of vegetation or stock is not established in the s32.</p> <p>How the shading or land might cause a significant increase in the risk of fire is not established in the s32.</p> <p>How the shading land may result in the loss of productive land is not established in the s32. Typically, shelterbelts enhance rural production.</p> <p>There is no s32 to explain the method is an appropriate response to the risk of damage to structures due to wind fall or root growth and to quantify this as a district problem.</p> <p>There is no s32 to explain why a 20m limit avoids the risk associated with ice forming on roads.</p> <p>There is no s32 to explain the method is an appropriate response to root damage on roads and to quantify this as a district problem.</p> <p>There is no s32 to explain the method is an appropriate response to road safety risk from windfall and to quantify this as a district problem.</p>
GRUZ-AM3 Setback for Sensitive Activities from Existing Intensive Primary Production Activities)	Support	Retain RPROZ-AM3 as notified.	Retain clear assessment criteria
GRUZ-AM9 Intensive Primary Production Activities (located more than 500 metres from a General	Oppose	Amend the assessment matters for Intensive Primary Production.	<p>Oppose the assessment matters for Intensive Primary Production.</p> <p>The proposed assessment matters are confusing and it is not clear in the objective and policy framework or section 32 why these have been applied to Intensive Primary Production. Eg:</p>



<p>Residential, Large Lot Residential, Rural Lifestyle, Settlement, or Commercial Zone boundary)</p>			<p><i>Effects on character and amenity of the zone from traffic generated by the proposal and the hours of operation.</i></p> <ul style="list-style-type: none"> • It is not clear why the effects of traffic generated from Intensive Primary Production on zones identified is a relevant concern and what control Council consider might be appropriate that might then not conflict with the viability of the primary production activity. <p><i>The method of storage and use of materials associated with the operation of the activity that may generate noxious, offensive, or objectionable odour beyond the site boundary.</i></p> <ul style="list-style-type: none"> • It is not clear what materials (use and storage) are of concern. <p><i>Methods of disposal of stormwater and wastewater for the activity.</i></p> <ul style="list-style-type: none"> • It is not clear why these discharges are of concern for this activity. There is no section 32 assessment justifying the duplication of stormwater or wastewater related controls under the regional plan. <p><i>The hours of the operation of the activity and the potential for noise effects to arise.</i></p> <ul style="list-style-type: none"> • It is not clear why the effects of the hours of operation from Intensive Primary Production on the identified zones is a relevant concern and what control Council consider might be appropriate that might then not conflict with the viability of the primary production activity which by their nature are 24/7 activities. <p><i>Setbacks from wāhi tapu, wāhi taonga and sites of significance identified in SASM-SCHED3 that are located within the site of the activity.</i></p>
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			It is not clear what effects from this primary production activity require a setback consideration from all wāhi tapu wāhi taonga and sites of significance identified in SASM-SCHED3 and why this is relevant as a consideration of no compliance with the 500m zone boundary setback.
GRUZ – Methods			
GRUZ-M3	Support	Retain GRUZ-M3 as proposed.	Support the promotion of management plans and industry codes of practice as a means of self-regulation and as a method to manage ground cover maintenance for pig farming.
GRUZ – Principal Reasons			
Principal Reasons	Support	Retain principal reasons as proposed.	<p>Support the statement that the General Rural Zone contains much of the District's rural land resource and exhibits land use that is predominantly in primary production. As such, this zone provides extensively for land-based primary production activities (including post-harvest facilities and intensive primary production). This recognition needs to also be expressed in the rural zone objectives and policies and the strategic direction as identified in this submission.</p> <p>Support the statement on the reasons for adopting policies and methods for Intensive Farming Activities. The methods used are all setbacks – from roads, property boundaries, zone boundaries and from sensitive activities. These methods can support a permitted activity status.</p>
RLZ – Rural Lifestyle Zone			
RLZ – Standards			
RLZ-S6 Setback from Existing Intensive Primary Production Activities	Support / Amend	<p>Amend RLZ-S6 as follows:</p> <p>Minimum setback of buildings from any buildings or enclosure housing animals reared intensively, or from organic matter and effluent storage, treatment and utilisation associated with intensive primary production activities, is 200 400 metres.</p>	Support the requirement for a setback of sensitive activities from existing intensive primary production activities. The setback should be increased to reflect the assessment criteria for subdivision in the rural zones: SUB-AM13(2)(c).
RPROZ – Rural Production Zone			
RPROZ – Introduction			

Introduction	Amend	Amend introduction as follows: The predominant land uses within this part of the rural area of the District are <u>primary production including intensive primary production</u> , cropping, livestock farming, and horticulture (including viticulture).	Consistent with the General Rural Zone description of the National Planning Standards, the Introduction would benefit from describing the zone as used primarily for primary production including intensive primary production. The change aligns with the principal reasons for adopting policies and methods stated in the RPROZ.
RPROZ – Issues			
GRUZ-I2	Amend	Amend GRUZ-I2 as follows: <u>Protecting Rural Amenity, and the Quality of the Rural Environment, and Primary Production Capability.</u> Land-based primary production, <u>intensive primary production</u> , and other complementary rural, residential, and recreation-based activities, underpin the social, economic, and cultural wellbeing of the District (particularly for the District's rural communities), but they can also adversely affect rural environmental, cultural, and amenity values <u>or result in conflict that affects primary production capability.</u>	Consistent with the General Rural Zone description of the National Planning Standards, the issue statement would benefit from describing the zone as used primarily for primary production including intensive primary production. The change aligns with the principal reasons for adopting policies and methods stated in the RPROZ.
RPROZ – Objectives			
RPROZ -01	Amend	Amend RPROZ-O1 as follows: The Rural Production Zone is predominantly used for primary production activities <u>including intensive primary production</u> and ancillary activities.	Consistent with the General Rural Zone description of the National Planning Standards, the objective must seek to ensure the zone is used primarily for primary production including intensive primary production. This ensures a planning framework link to the relevant policies and in particular RPROZ-P5. The change aligns with the principal reasons for adopting policies and methods stated in the RPROZ.
RPROZ – Policies			
RPROZ-P1	Amend	Amend RPROZ -P1 as follows: To allow <u>enable</u> land-based primary production, <u>intensive primary production</u>	Consistent with the General Rural Zone description of the National Planning Standards, the policy must seek to ensure the zone supports primarily for primary production including intensive



		and ancillary activities which are compatible with the primary productive purpose and predominant character and amenity of the Rural Production Zone.	primary production. This ensures a planning framework link to the provisions providing for intensive primary production activities. The change aligns with the principal reasons for adopting policies and methods stated in the GRUZ.
RPROZ -P5	Support	Retain RPROZ-P5 as proposed	Support directive policy to require sufficient separation between sensitive activities and existing primary production and intensive primary production activities, and between new intensive primary production activities and property and zone boundaries, in order to avoid, remedy or mitigate potential adverse effects, including reverse sensitivity and land use conflict.
RPROZ -P7	Support	Retain RPROZ-P7 as proposed.	Support a policy of avoiding reverse sensitivity effects on lawfully established primary production activities.
RPROZ – Rules			
RPROZ-R1 Residential Activities	Oppose / Amend	Amend RPROZ-R1 as follows. 1.a. v. <u>one minor residential unit or one workers accommodation</u> per site: <u>In the case of a residential unit:</u> <ul style="list-style-type: none"> d. limited to a maximum gross floor area of 100m² (exclusive of garages, and verandahs less than 20m²); and e. must share vehicle access with the principal residential unit on the site; and f. must be located no further than 50m from a principal residential unit on the site. <u>In the case of workers accommodation:</u> <ul style="list-style-type: none"> c. <u>limited to a maximum gross floor area of 120m² (exclusive of garages, and decks); and</u> 	Support the provision of one minor residential unit per site less than 12ha and additional dwellings pro-rated to property size. Oppose the limitation of a minor residential unit to a GFA of 100m ² and to be located within 25m from a principal residential unit on a site. This is an impractical limitation on farming units less than 12ha particularly on intensive primary production activities where farm workers (and families) are typically required to live onsite and not in a seasonal working arrangement. While a minor residential unit may have a relationship (e.g. dependent relative) to the principal residential unit) and benefit from locating adjacent the principal residential unit, workers accommodation typically requires more independence. Workers accommodation is not practically situated 25m from the principal residential unit and needs to respond to the farm structure and privacy of occupants. As an alternative to the cost and uncertainty of a restricted discretionary activity a permitted activity pathway is an appropriate resource management response for an activity necessary to support primary production and consistent with RPROZ-P2 and RPROZ-O4.



		d. <u>must share vehicle access with the principal residential unit on the site.</u>	
RPROZ-R3 Primary production activities	Support	Retain RPROZ-R3 as proposed.	Support a permitted activity status for primary production activities.
RPROZ-R8 Visitor Accommodation	Oppose	Delete RPROZ-R8 or change activity status.	Oppose the permitted activity status for visitor accommodation in the RPROZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response in this zone.
RPROZ-R9 Commercial Activities	Oppose	Delete RPROZ-R9 or change activity status.	Oppose the permitted activity status for commercial activities in the RPROZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response in this zone.
RPROZ-R10 Community facilities	Oppose	Delete RPROZ-R10 or change activity status.	Oppose the permitted activity status for community activities in the RPROZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response in this zone.
RPROZ-R11 Educational facilities	Oppose	Delete RPROZ-R11 or change activity status.	Oppose the permitted activity status for educational activities in the RPROZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response in this zone. The designation process is available for these activities.
RPROZ-R14 Intensive Primary Production Activities	Oppose	Retain RPROZ -R14, 1. Activity Status: CON Amend Matters of Control	Support the controlled activity status for Intensive Primary Production. Oppose the matters of control. The proposed matters of control are confusing and it is not clear in the objective and policy



	<p>Amend RPROZ -R14, 3. as follows: 3. Activity status where compliance with condition RPROZ-R14(1)(c) <u>and/or RPROZ-R14(1)(a)</u> is not achieved: DIS</p> <p>Amend RPROZ -R14, 4. as follows: 4. Activity status where compliance with conditions RPROZ-R14(1)(a) <u>and/or</u> RPROZ-R14(1)(d) is not achieved: NC</p>	<p>framework or section 32 why these have been applied to Intensive Primary Production. Eg:</p> <p><i>Effects on character and amenity of the zone from traffic generated by the proposal and the hours of operation.</i></p> <ul style="list-style-type: none"> • It is not clear why the effects of traffic generated from Intensive Primary Production on the character and amenity of the rural zone are a relevant concern and what control Council consider might be appropriate that might then not conflict with the viability of the primary production activity. • It is not clear why the effects of the hours of operation from Intensive Primary Production on the character and amenity of the rural zone are a relevant concern and what control Council consider might be appropriate that might then not conflict with the viability of the primary production activity which by their nature are 24/7 activities. <p><i>The method of storage and use of materials associated with the operation of the activity that may generate noxious, offensive, or objectionable odour beyond the site boundary.</i></p> <ul style="list-style-type: none"> • It is not clear what materials (use and storage) are of concern. <p><i>Methods of disposal of stormwater and wastewater for the activity.</i></p> <ul style="list-style-type: none"> • It is not clear why these discharges are of concern for this activity and not other permitted activities and no section 32 assessment justifying the duplication of stormwater or wastewater related controls under the regional plan.
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			<p>Setbacks from wāhi tapu, wāhi taonga and sites of significance identified in SASM-SCHED3 that are located within the site of the activity.</p> <ul style="list-style-type: none"> It is not clear what effects from this primary production activity require a setback consideration from all wāhi tapu, wāhi taonga and sites of significance identified in SASM-SCHED3. <p>Oppose the non-complying activity status for intensive primary production activities where minimum setbacks are not archived. The activity status is unnecessarily onerous when a discretionary activity status provide robust effects and policy assessment in circumstances of non-compliance.</p>
RPROZ-R16 Camping Grounds	Support	Retain RPROZ-R16 as proposed.	Support the discretionary activity status for Camping Grounds in the RPROZ. These are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response.
RPROZ – Standards			
RPROZ-S1 Activity thresholds	Oppose	Delete Restaurants	It is not clear what the activity status for Restaurants is in the RPROZ but these are sensitive activities likely to conflict with all primary production activities. The activities are not supported by an objective and policy structure that leads to a permitted activity rule as being an appropriate resource management response.
RPROZ-S2 Total Building Coverage	Oppose	Delete RPROZ-S2 as it relates to intensive primary production	Oppose the building coverage limitation of 35% of the net site area or 1500m ² , whichever is the lesser, that would apply to intensive primary production. This would conflict with the purpose of the zone principal reasons for adopting the policies and methods i.e, this zone provides extensively for land-based primary production activities (including post-harvest facilities and intensive primary production.
RPROZ-S7 Shade of land and roads	Oppose	Delete RPROZ -S6 trees on boundaries.	Oppose the imposition of rules covering trees on all boundaries. Shelterbelts are part of the rural landscape and define the character and amenity of rural environments. Shelterbelts are

			<p>planted primarily to provide shelter for stock, crops, or non-principal buildings from winds.</p> <p>The rule should be deleted or relate to the sensitivity of the adjoining site both in terms of property size and land use. Where adjoining an existing Lifestyle Site or residential unit a control may be justified. Where adjoining primary production it may not.</p> <p>The section 32 does not adequately address what effect on the road is of concern for the Central Hawkes Bay that justifies the resource management approach and why if this was a sound resource management response, there is not national consistency. The rule imposes a control on trees forming a continuous line for a distance of more than 20 metres. It is not clear in the s32 why 20m is a trigger point for an issue of shading a road.</p>
RPROZ-S12 Setback from Existing Intensive Primary Production Activities	Support / Amend	<p>Amend RPROZ-S12 as follows:</p> <p>Minimum setback of buildings from any buildings or enclosure housing animals reared intensively, or from organic matter and effluent storage, treatment and utilisation associated with intensive primary production activities, is 200 400 metres.</p>	Support the requirement for a setback of sensitive activities from existing intensive primary production activities. The setback should be increased to reflect the assessment criteria for subdivision in the rural zones: SUB-AM13(2)(c).
RPROZ – Assessment Matters			
RPROZ-AM2 Shading of Land and Roads	Oppose	Delete RPROZ-AM2 as notified.	<p>The rule is titled Shading of Land and Roads but the criteria extends to the health of vegetation or stock, fire risk, windfall, and root damage.</p> <p>How planting within the setback area can adversely affect the health of vegetation or stock is not established in the s32.</p> <p>How the shading or land might cause a significant increase in the risk of fire is not established in the s32.</p> <p>How the shading land may result in the loss of productive land is not established in the s32. Typically, shelterbelts enhance rural production.</p>



			<p>There is no s32 to explain the method is an appropriate response to the risk of damage to structures due to wind fall or root growth and to quantify this as a district problem.</p> <p>There is no s32 to explain why a 20m limit avoids the risk associated with ice forming on roads.</p> <p>There is no s32 to explain the method is an appropriate response to root damage on roads and to quantify this as a district problem.</p> <p>There is no s32 to explain the method is an appropriate response to road safety risk from windfall and to quantify this as a district problem.</p>
RPROZ-AM3 Setback for Sensitive Activities from Existing Intensive Primary Production Activities)	Support	Retain RPROZ-AM3 as notified.	Retain clear assessment criteria
GRUZ-AM10 Intensive Primary Production Activities (located more than 500 metres from a General Residential, Large Lot Residential, Rural Lifestyle, Settlement, or Commercial Zone boundary)	Oppose	Amend the assessment matters for Intensive Primary Production.	<p>Oppose the assessment matters for Intensive Primary Production.</p> <p>The proposed assessment matters are confusing and it is not clear in the objective and policy framework or section 32 why these have been applied to Intensive Primary Production. Eg:</p> <p><i>The traffic generated by the proposal.</i></p> <ul style="list-style-type: none"> It is not clear why the effects of traffic generated from Intensive Primary Production on zones identified is a relevant concern and what control Council consider might be appropriate that might then not conflict with the viability of the primary production activity.



			<p><i>Any noxious, offensive, or objectionable odour arising from the activity beyond the site boundary or any storage of materials associated with the operation of the activity.</i></p> <ul style="list-style-type: none"> • It is not clear what materials (use and storage) are of concern. <p><i>The effects arising from the stormwater/wastewater management of the activity.</i></p> <ul style="list-style-type: none"> • It is not clear why these discharges are of concern for this activity no section 32 assessment justifying the duplication of stormwater or wastewater related controls under the regional plan. <p><i>The hours of the operation of the activity and the potential for noise effects to arise.</i></p> <ul style="list-style-type: none"> • It is not clear why the effects of the hours of operation from Intensive Primary Production on the identified zones is a relevant concern and what control Council consider might be appropriate that might then not conflict with the viability of the primary production activity which by their nature are 24/7 activities. <p><i>Setbacks from wāhi tapu wāhi taonga and sites of significance identified in SASM-SCHED3 that are located within the site of the activity.</i></p> <p>It is not clear what effects from this primary production activity require a setback consideration from all wāhi tapu wāhi taonga and sites of significance identified in SASM-SCHED3 and why this is relevant as a consideration of no compliance with the 500m zone boundary setback.</p>
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RPROZ – Methods



RPROZ-M3	Support	Retain RPROZ-M3 as proposed.	Support the promotion of management plans and industry codes of practice as a means of self-regulation and as a method to manage ground cover maintenance for pig farming.
RPROZ – Principal Reasons			
Principal Reasons	Support	Retain principal reasons as proposed.	<p>Support the statement that the General Rural Zone contains much of the District's rural land resource and exhibits land use that is predominantly in primary production. As such, this zone provides extensively for land-based primary production activities (including post-harvest facilities and intensive primary production). This recognition needs to also be expressed in the rural zone objectives and policies and the strategic direction as identified in this submission.</p> <p>Support the statement on the reasons for adopting policies and methods for Intensive Farming Activities. The methods used are all setbacks – from roads, property boundaries, zone boundaries and from sensitive activities. These methods can support a permitted activity status.</p>

