

**PROPOSED AUCKLAND UNITARY PLAN  
HORTICULTURE NEW ZEALAND  
PUKEKOHE VEGETABLE GROWERS ASSOCIATION**

## **1. ISSUES**

The majority of Auckland is comprised of rural land (70% of the land mass). The rural environment is diverse and valued by Aucklanders for a number of reasons including the capacity for rural production. Auckland's rural south produces a significant proportion of New Zealand's onions, tomatoes and potatoes. The north hosts vineyards and supplies niche products such as capsicums, blueberries and organics. 2% to 3% of Auckland's GDP is attributable to agriculture and agricultural services and processing from the region. This is about \$1.22 billion annually.

The value of Auckland's rural land for rural production extends beyond the territorial boundaries and influences the national wellbeing of New Zealand. Over the past 20 years, horticulture exports have grown from \$NZ 200 million to \$NZ 2.23 billion. The area of horticultural crops has also increased 40% to 121,000 ha in just over 10 years. Including domestic sales, the horticulture industry is worth \$NZ 5 billion making it New Zealand's sixth largest export industry, and it employs 50,000 people in eight key growing regions – one of which is Auckland.

In the Auckland region horticulture contributes around half of the \$1Bn regional contribution to GDP annually.

It is not just the economic benefits associated with rural production that are important to Auckland. 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 Auckland's community as a whole, through the provision of food security.

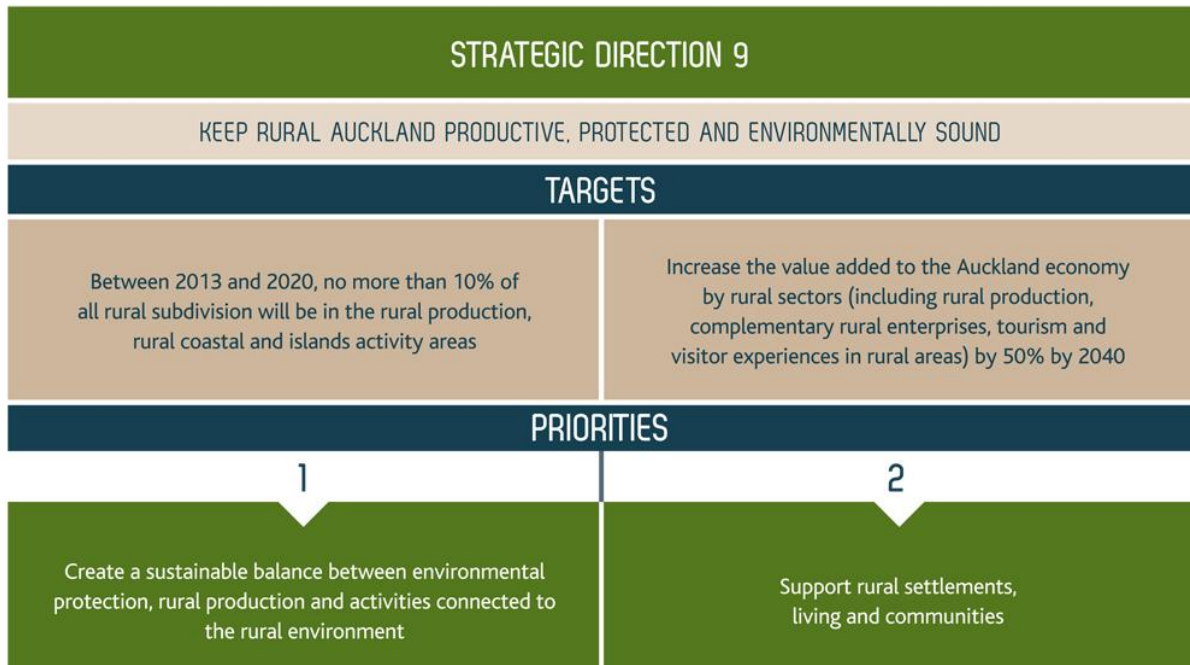
Representatives of the rural sector have been engaged with the Auckland Council through the Rural Advisory Panel as it developed the Auckland Plan and progressed to notification of the PAUP. Horticulture New Zealand is generally comfortable with the strategic direction but seeks stronger recognition of the horticultural sector and support for ongoing activity and growth.

The Auckland Plan provides the strategic direction for Auckland over the next 30 years and provides a basis for aligning the implementation plans, regulatory plans and funding programmes of the Auckland Council. The PAUP implements the Auckland Plan, by;

- spatially identifying opportunities and constraints for activities and development in Auckland.
- identifying highly valued and regionally significant resources that the policies protect or manage.
- establishing clear and consistent priorities for resource use and protection by identifying boundaries and limits based on environmental values.

- establishing priorities for resource use where there are likely to be competing uses, such as competition for land between primary production and urban development.
- setting rules for regulating land use, subdivision and development.

The Auckland Plan is unequivocal on the strategic direction for rural production.



This strategic direction is supported by two key directives related to rural production:

#### DIRECTIVE 9.1

Ensure that the resources and production systems that underpin working rural land are protected, maintained and improved.

#### DIRECTIVE 9.2

Develop a regulatory framework that accommodates and encourages productive rural uses, changing activities and associated enterprises.

How the strategic direction and Directives 9.1 and 9.2 are implemented through the PAUP are of critical importance to the horticultural sector. Key issues to address include:

- Recognising Nationally Significant Rural Land.
- Providing for Regionally Significant Rural Production.
- Achieving Economic Development Targets.
- Protecting Food Supply.
- Post Harvest Production.

These matters are generally discussed in Chapter A: Introduction and Chapter B: Regional Policy Statement of the PAUP. However, it is the submitter's position that matters

concerning rural production in Auckland are of regional significance and that the PAUP should recognise this as a specific Issue of Regional Significance in Chapter B.

## **2. THREATS**

There are a number of threats to the viability of the Horticultural sector in Auckland. These are:

- Water management – including allocation of water quality and quantity parameters are key matters for the horticultural sector. Without water ‘Elite’ and ‘Prime’ land cannot support high value rural production.
- Land supply – which is affected by changes to the Rural Urban Boundary and land fragmentation. Access to the land resource is paramount for the horticultural sector.
- Infrastructure – the transportation needs of the rural sector include land access and linkages to the market, ports, airport etc. With urban growth comes added pressure to transport networks. There is also pressure on other infrastructure and resources such as gas supplies.

Permitting – the regulatory regime must be permissive to avoid unreasonable costs and delays in undertaking rural production activities. The other risk associated with permitting is that it works at cross purposes. The plan needs to ensure that the underlying resources required for rural production are not disconnected from the activity provisions.

- Reverse sensitivity – conflict between resource users and particularly with rural residential land use can result in constraints to production.
- Biosecurity – policy to manage threats must be clear, activity placement must be cognisant of biosecurity issues, in the event of a biosecurity threat the regulatory regime must permit immediate action such as burning or burial of plant material.

The threats to the horticultural sector underpin much of the commentary and suggested changes to the PAUP by the submitter.

## **3. THE RURAL URBAN BOUNDARY**

There is general support from Horticulture New Zealand for the Rural Urban Boundary and Future Urban Zone. However, the submitter identifies issues that include.

- The need for the PAUP to better describe the locational choice for urban growth to provide guidance on how rural land use factors are considered and whether there are rural land use considerations that support or constrain achieving a quality compact urban form.
- The submitter has received feedback from growers identifying some concerns with the eastern side of Pukekohe Hill and subsequent loss of Elite Land to urban expansion in Pukekohe.

- There are alternatives to the current RUB to be considered.
- Large Post Harvest Facilities and rural production is located within the RUB.
- There needs to be discussion on issues at the RUB and rural interface and how these are to be managed i.e. reverse sensitivity, noise, odour, lighting, amenity, transport linkages, utility accessibility (water/gas) as this may affect urban form.
- New or improved transport corridors serving urban growth and growth in rural production should be secured.

Around 5.5% of New Zealand's productive land resource is versatile land: (<http://www.hortnz.co.nz/users/Image/Downloads/PDFs/Versatile%20soils%201%20June%202011.pdf>).

Versatile land is land suitable for high value horticultural production because it has a range of enabling factors such as high quality soil, water, frost free climate, shelter, access to labour, transport, close markets and an enabling rule framework that discourages subdivision and land fragmentation. This is Elite or Prime Land by definition under the PAUP.

Between 1990 and 2008 29% of New Zealand's available versatile land has been converted to new urban areas. Urbanisation is a trend that is unlikely to be reversible.

Marlborough (59%), Hawke's Bay (49%), Waikato (36%) and Auckland (35%), have seen the highest level of conversion. Planning mechanisms focussed on soil protection have been unhelpful because they indirectly target the problem which is subdivision for rural residential purposes. There are two things that are required to prevent further degradation of the versatile land resource:

- Maintenance of an operating environment that encourages rural production activities on versatile land.
- Prohibition or prevention by other means of subdivision for rural residential purposes on versatile land.
- 

Currently, subdivision proposals often meet a non complying activity test because they can prove the soil has been rendered useless for its productive purpose by the removal of other key resources.

Growers are also provided a perverse incentive to subdivide because they are rated for the potential use of the land, rather than the actual use. In this way growers have noted to Horticulture New Zealand staff they feel entitled to a subdivision right because they have "paid for it" in rates.

The submitter considers that a balance must be struck between protecting the rural versatile land resource and providing for greenfields expansion.

The submitter considers that the proposed policy requires strengthening to avoid urban development in rural production areas outside of the RUB. The areas to be avoided only reference to Elite Land (LUC 1). There is a need to also address Prime land (LUC 2 or LUC 3).

The RUB encompasses Elite Land and other productive land and rural production activities. Current policy states that we should continue to use greenfield land within the RUB for rural activities until urban zonings are applied, provided that subdivision, use and development does not compromise the future urban use of the land and avoids land fragmentation. It is the submitter's opinion that land within the RUB will likely be sterilised for productive use and unattractive for rural investment unless the land use activity regime is appropriate. The 'right to farm' must apply for rural production activities and expansion must be accommodated for those activities (e.g. Post Harvest Facilities) that can assimilate into an urban environment.

The progression of urbanisation within the RUB will create conflict with rural production at the rural/urban interface and create uncertainty for rural land users. To assist in the transition a supportive 'rural' based land use regime is required and incentives should be provided to avoid land banking and inactivity in these areas including a supportive rating approach.

As previously identified, there are concerns with the RUB on the eastern side of Pukekohe Hill. This decision would remove nationally recognised Elite land from rural production and compromise an existing Post Harvest Facility.

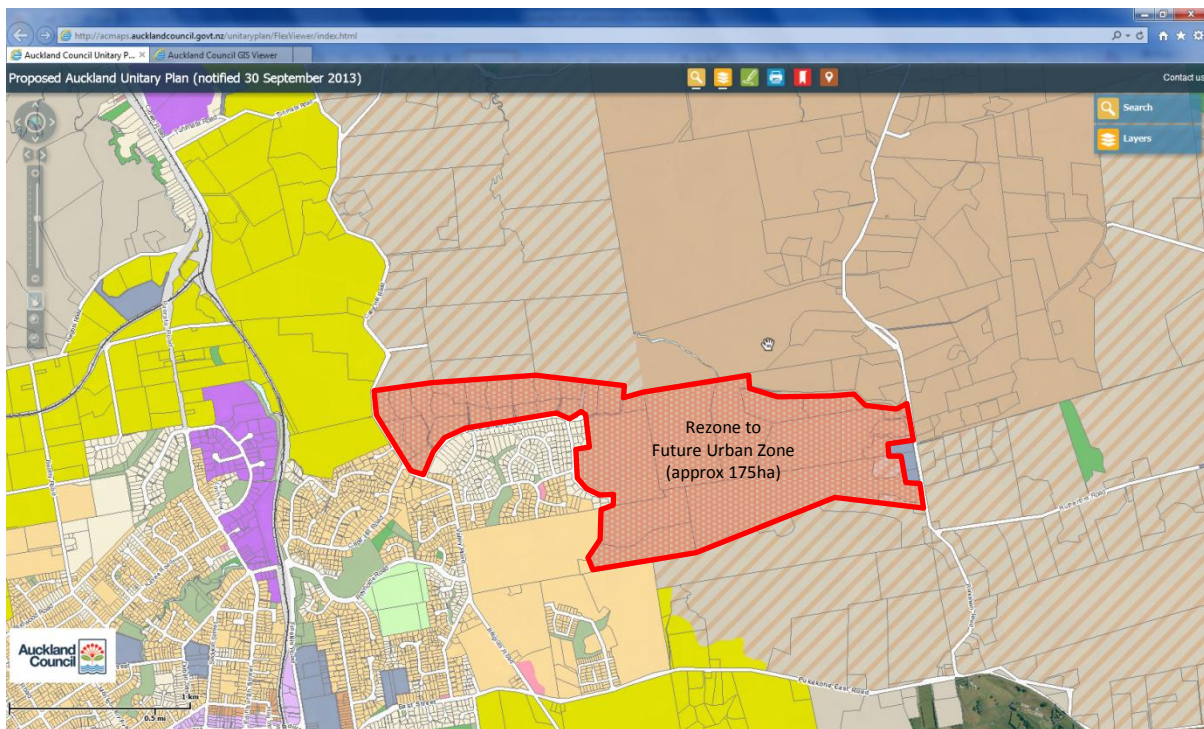
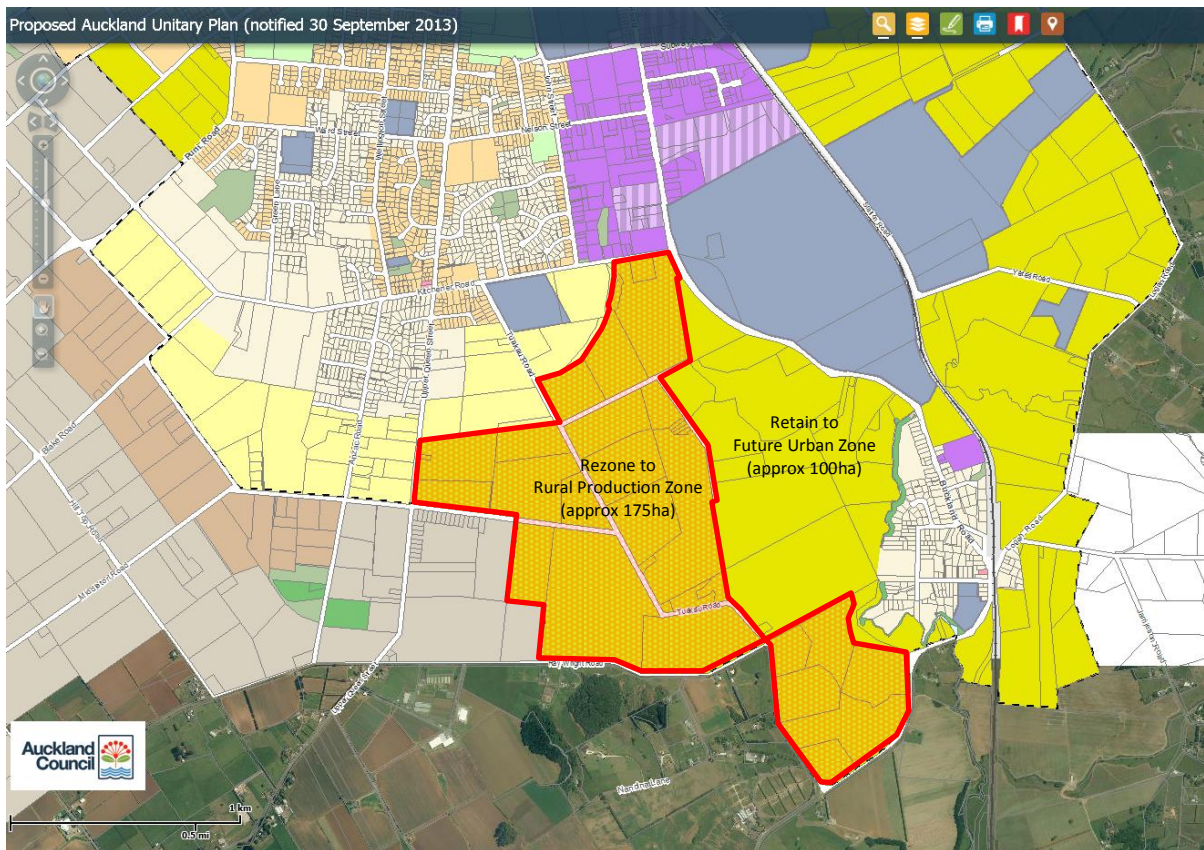
There are alternative locations for urban growth that will not compromise rural production. E.g. East of Grace James Drive and potentially around rural villages.

The option provided below removes the Future Urban Zone notation from 175 hectares of nationally significant Elite soil and retains 100 hectares of Future Urban Zone adjacent Buckland Road and Buckland Village to achieve the connectivity desired in this area.

The loss of 175 hectares of Future Urban Zone on the eastern side of Pukekohe is replaced by approximately 175 of proposed Future Urban Zone on the current north east Pukekohe urban limit. This area does not contain the same high quality soil values, is currently used for countryside living but of sufficient lot size to enable urbanisation, is well served by roads and has linkages to arterials, has linkages to the countryside living zone and a school, contains contour and natural features that will be attractive in an urban setting and avoids the Pukekohe Tuff Ring. It is noted that road access is potentially achievable to extend a road linkage to Cape Hill Road and the large Future Urban Zone in Paerata and thereby create an alternative road linkage around the north east of Pukekohe.

The capacity for growth in the 'Pukekohe North East' Future Urban Zone suggested would likely be greater than that that could be achieved on Pukekohe Hill. The Pukekohe Hill Sub-Precinct highlights the landscape, amenity, iwi and stormwater management issues that affect the residential land use yield and form. The use of nationally significant soils for large lot residential land use is in the submitter's opinion and inefficient use of a scarce natural resource.





The submitter generally supports the approach to rural and coastal settlement growth. These areas play an important role in supporting the rural sector. However, the requirement that growth within un-serviced villages be contained within their urban boundaries existing at 2013 is not supported. The region has seen applications for village growth in serviced villages (e.g. Patumahoe) across LUC I, II and II land. This is not sustainable when there are

other existing unserviced villages which are potentially better placed to accommodate village growth without impacting on rural production. Limiting unserviced villages to 2013 boundaries is short-sighted.

As stated earlier there is concern that 'rural' land within the RUB will likely be sterilised for productive use and unattractive for rural investment unless the land use and subdivision activity range is appropriate. The objectives and policies that look to enable rural activities within the RUB (Future Urban Zone) are unlikely to be enough to support the outcomes sought with it becoming increasingly difficult to continue rural production within the FUZ on at the interface. There is a need to amend the policy and method platform to support ongoing rural production within the FUZ until superseded by urbanisation and the protection of rural provide activities from the adverse effects of urbanisation on the RUB interface. Of concern is the Prohibited Activity status on subdivision in the FUZ. There may be legitimate situations where subdivision to support the viability of rural production in the Future Urban Zone necessitates the creation of a new title. An example being the need to subdivide off part of a property to facilitate urban development or infrastructure provision while the balance remains in productive use.

#### **4. REZONED AREAS IN THE NORTH**

##### **MANGERE PUHUNUI**

The submitter supports the Mangere Puhinui precinct that recognises that the volcanic soils of Mangere and Puhinui are well known as a prolific food growing area, due to the highly fertile soils, moderate climate and gentle topography. The submitter supports the purpose of the precinct being to recognise the relationship and values that tangata whenua have with the area, maintain an open rural character and areas for food growing.

##### **WAIMAUKU, KUMEU**

The submitter supports the Rural zoning regime established in the Waimauku area. This includes an appropriate mix of predominant Rural Production Zone, areas of Mixed Rural Zone defined areas of Countryside Living Zone that generally appear to follow existing countryside living environments from the legacy plan.

Of concern to the submitter is the Future Urban Zone which is a dramatic extension to future urban area identified in the legacy plan. The area encompasses land characterised by 10 acre (4ha) horticultural lot parcels and will impact on the ability of landowners to continue rural production. The right to farm within this area until urbanisation should be explicit.

##### **MAHURANGI, POINT WELLS, OMAHA**

The submitter supports the zoning regime that extends from Warkworth to the eastern coastline including the position of the Future Urban Zone at Warkworth. The extent of the Mixed Rural Zone addresses the environmental characteristics of this area.

## 5. MIXED RURAL ZONE

### LAND USE

The size of the proposed Mixed Rural Zone has increased significantly from the draft to the PAUP. Horticulture New Zealand is supportive of the zone and its extent and notes that the primary intent is to support productive rural land use. However, the zone description is not an accurate portrayal of the environment and may be more of a desired outcome than current characteristics. The zone description is as follows:

*The purpose of the Mixed Rural zone is to provide for mixed rural production, generally on smaller rural sites, non-residential activities of a scale compatible with smaller site sizes, and existing rural lifestyle development.*

*These areas have a history of horticulture and viticulture, including greenhouse production of flowers, fruit and vegetables, wine production, intensive poultry farming, and equine-related activities and services. This has given rise to associated buildings and other structures such as packhouses, coolstores, wineries, and equine training tracks and buildings for indoor rural production. These activities have in turn supported the establishment of produce stalls and retail services such as cafés and restaurants and tourist and visitor-related facilities.*

*Rural sites in the Mixed Rural zone are often larger than those in Countryside Living zones. This means they provide greater flexibility to accommodate a range of rural production activities and associated non-residential activities while still ensuring good amenity levels for residents who use their land for rural lifestyle purposes*

The submitter notes that the large extent of Mixed Rural Zone is likely to be characterised by larger rather than smaller lot sizes. Areas like the Awhitu Peninsular and north of Linwood Road does not have a history of horticulture or viticulture. Packhouses are not known to be common in this environment. The purpose and outcome sought in the Mixed Rural Zone is not disputed but a more accurate description should be provided. The zone intent should remain to support rural production.

While the objectives and policies suggest more flexibility for 'non-residential activities' the only provision is a Restricted Discretionary rather than a Discretionary Activity status for visitor accommodation and garden centres. All other activities maintain the same activity status across the Rural Production and Mixed Rural Zones. This is supported but given the existence or potential for smaller lot sizes greater emphasis should be on internalising effects and ensure rural production is uninhibited.

### SUBDIVISION

The Mixed Rural Zone can support a broad range of productive rural activities often on smaller and more varied parcel structure. The land may not be elite or prime but is productive and diversity can be supported through subdivision.

The Mixed Rural Zone takes in large land units in the south including all land in the Awhitu rural area, land north of Linwood Road and large parts of the Papakura Clevedon Valley. The



zone purpose is to provide for mixed rural production, generally on smaller rural sites. While there are scatter smaller lots and some concentrations, there are areas (e.g. Awhitu) where the parcel structure and land use does not match the zone description or purpose.

The PAUP subdivision policy suggests that new subdivision for rural production purposes will be provided through the methods but this is not the case. There are no tailored subdivision methods for the Mixed Rural Zone or any other rural zone and the rural production subdivision minimum lot size of 150ha serves no purpose. As above, an incentive could be provided for moving titles to this area from the Rural Production Zone.

## **6. TRANSFERABLE RURAL SITE SUBDIVISION**

Horticulture New Zealand supports the overall policy approach for rural subdivision and particularly a transferable title policy platform and defined countryside living areas. Horticulture New Zealand remains opposed to subdivision of Elite or Prime land that results in additional dwellings.

The following comments are made in regards to the Transferable Rural Site Subdivision method.

The submitter opposes the requirement that donor sites for transferable rural site subdivision must be separately recorded on the council valuation role. This should be used to define the base unit as an alternative to the minimum net site area. Properties comprised of multiple certificates of title typically hold these titles in one valuation to avoid paying multiple rating charges. If this requirement remains it will force landowners to break the ratings unit and exacerbate transfers given rates increases. The criteria should be based on a separate certificate of title that meet the minimum net site area or are separately recorded on the council valuation role.

The submitter opposes the inability to transfer titles within the “Receiver Site Exclusion Area” in north Franklin as this is an area of rural production. This is a hangover from PC14 that provided a site specific subdivision package to address submissions. The relevance to the new Auckland area and regional growth management policy platform is not clear.

The lack of alternative subdivision methods in the Mixed Use Zone is considered inconsistent with the policy platform for this environment and the range of activities present and proposed. While having a productive rural base, this environment is diverse in activities and parcel sizes and an attractive area as a transferable title receiving environment. Similar to the Countryside Living Zone an incentive could be provided for moving titles to this area.

## **7. LAND USE ACTIVITIES**

### **BUILDINGS/STRUCTURES**

Buildings and structures are both integral for horticultural production. Significant confusion exists over what is considered to be a building, and what is considered to be a structure. The submitter has sought to clarify what is what, and to identify the horticultural buildings and structures that need to be recognised and provided for.

## **ACTIVITIES**

Plan provisions and zoning encourages rural production in rural zones. The submitter has sought to ensure that normal rural production activities that are associated with or ancillary to horticultural production are provided for.

## **EARTHWORKS**

Land disturbance activities are a common and necessary requirement to support rural production activities. There is often confusion and misunderstanding between planning documents around these activities that can result in regulatory regimes that are impractical and unworkable for rural land users.

There are three areas of land disturbance of interest to the submitter being:

- Earthworks
- Clean filling
- Cultivation

Earthworks are works that involve the relocation of quantities of soil, rock or cleanfill. Clean filling is the deposition of inert no-hazardous material to enact land form change and this does not include material imported to a site for driveway, track or hard stand construction or maintenance.

Cultivation is the preparation of land to support rural production. The soil is not relocated and the activity is different to earthworks. However, as with earthworks, cultivation also exposes soil to rain and wind and requires an appropriate management response to ensure rural production activities are not inhibited and the life supporting capacity of the soil resource is protected. The submitter opposes the definition of Earthworks which includes 'cultivation'. The definition of 'cultivation' is supported.

The PAUP policy must support unitary plan methods that are fit for purpose and ensure no barriers to the operation and growth of rural production. The current policy regime is confusing and a better approach would be to describe the activities as 'land disturbance activities' in a similar approach to the draft PAUP.

It is the submission of Horticulture New Zealand that the Regional and District Objectives and Policies should be amended to support this approach.

Across the Rural Zones there is generally a supportive regime for earthworks associated with rural production activities. The submitter supports the Permitted Activity status arrangement for:

Earthworks for the installation, operation and maintenance and repair of:

- Fences – being a necessary rural activity with ancillary earthworks that includes fenceline tracking and post ramming.
- Effluent disposal systems – that require ancillary earthworks for treatment systems and disposal fields.
- Planting of any vegetation – that must include hedges required for horticulture and may require ground preparation for planting or earthworks associated with stump removal.
- Driveways and parking areas - being a necessary rural activity and includes paddock access and hard stand areas for farm vehicle movements associated with horticulture e.g. truck units for harvesting.
- Irrigation and land drainage work below the natural ground level.

The Permitted and Restricted Discretionary Activity thresholds (volume and area) for earthworks in the Rural Zones is also supported and the submitter would not support a more onerous activity status for earthworks.

The submitter also supports the Permitted Activity status for maintenance earthworks and new tracks for farming in the Rural Zone

The submitter supports the Permitted Activity status for cultivation in the Rural Zones which differentiates the activity from earthworks. However, the submitter opposes the Discretionary Activity status for cultivation greater than 2500m<sup>2</sup> in 'All other zones and roads' which is interpreted to include the Future Urban Zone. This limitation will further discourage rural production activity in this environment or protect a land users 'right to farm'. An example being, should a land user change from cultivation to pastoral use for a season permitted activity rights would be lost and a consent requirement established with, as a Discretionary Activity) no guaranteed outcome in the applicants favour.

The Overlays bring down a further regularly layers that would inhibit rural production. The submitter opposes the down-slope controls on cultivation adjacent the CMA, river, lake or stream that require a minimum separation distance (yard) to be maintained in a vegetated condition at all times. There is no guidance or definition for 'vegetated condition'. Is this grass cover, native or exotic plantings? There are also plant species that are or can harbour pests and diseases that compromise horticultural activity. Would planting and maintenance including re-planting be a permitted activity?

The performance standard requiring the installation of appropriate erosion and sediment controls will achieve the same outcome being avoiding sedimentation of the CMA, rivers, lakes or streams. Furthermore, rural landowners do not typically cultivate to the CMA, river, lake or stream bank and more could be achieved through education than regulation.

<b>IMPORTATION OF CLEANFILL</b>
---------------------------------

Cleanfill assists with land development. Often cleanfill in the form of clay based material or granular fill is required as foundation material to support building development in the rural environment. Cleanfill is also used for land management purposes such as drainage or track

creation and maintenance. Material is typically sourced offsite and deposited on the rural property which can mistakenly be deemed a cleanfilling activity. Invariably cleanfill activities of this nature are also considered an earthwork activity. Legacy plans provide a confused consenting regime that often requires consent for cleanfill deposition and earthworks which are a typical and necessary part of rural land use development and management.

Cleanfill associated with building platform and foundation establishment is typically required to be certified by an engineer as part of the Building Consent process. There is no need to duplicate engineering information requirements or set erroneous resource consent requirements or conditions for matters than could be covered in appropriate permitted activity controls.

The permitted activities must provide for cleanfill for building platform and foundation establishment, as addressed in the cleanfill definition. Cleanfill used for land management purposes such as drainage or track creation and maintenance must also be a permitted activity.

It is the submission of Horticulture New Zealand that the Regional and District Objectives and Policies should be amended to support this approach and well as changes to the definition of Cleanfills.

#### **DRAINAGE**

Drainage of land is an important function in the rural environment and provides significant environmental benefits to communities through the prevention of uncontrolled sheets of water moving through production land. Drainage needs to be regularly maintained and the maintenance and enhancement of drainage networks must be recognised and provided for. The significant economic benefits of existing drainage should also be recognised.

#### **ENVIRONMENTAL WORKS**

Environmental works that improve or enhance environmental quality should be provided for as permitted activities within the plan. Codes of practice developed and identified by industry should be used as the basis of the permitted activity framework to provide for these activities. In addition, provision must be identified for environmental enhancements to offset the effects of water storage facilities or water infrastructure.

#### **VEGETATION MANAGEMENT**

The background discussion to the vegetation management issue provides appropriate recognition of the contribution vegetation cover plays to a range of ecosystem services. However there is a need to also recognise productive rural land use requires the ability to manage vegetation species and growth to ensure production activities are not compromised. Unmanaged vegetation can cause root intrusion or overhang of productive land as well as adverse shading effects, infrastructure (tracks, pipes, buildings) disruption and harbour pests and diseases. The submitter suggests policy and method changes to address this deficiency.

The submitter supports the Permitted Activity status for Biosecurity tree works. Any limitation on the ability to plant, maintain or remove hedges and natural shelter belts in the Rural Zones is opposed.

#### **NOISE**

Noise in the rural environment and particularly at sensitive interfaces i.e., dwellings, countryside living, RUB interface is a significant resource management issue. The proposed policy is focused on the effects of noise in the urban environment and fails to adequately address this issue in a rural context. Subsequently the Auckland wide noise standards are unreasonable for a rural environment and will curtail productive rural activities. The submitter seeks exclusion in the rural zones for rural production activities from the noise standards.

#### **LIGHTING**

The policy is silent on the lighting issues associated with rural production activities. Subsequently the Auckland wide lighting standards are unreasonable for a rural environment and will curtail productive rural activities. The submitter seeks exclusion in the rural zones for rural production activities from the lighting standards.

#### **POST HARVEST FACILITIES**

Post Harvest facilities are changing as the industry changes. There is a requirement to modernise the definitions on post harvest facilities to provide for a broader range of activities. In addition, increases to the existing footprint of post harvest facilities should be encouraged to increase the efficiency of post harvest production as an alternative to requiring greenfields development. The submitter has sought changes to this effect.

#### **AGRICHEMICAL STORAGE AND USE**

The national suite of standards and training methods that support safe horticultural management of agrichemicals need to be endorsed and supported in the plan to encourage comprehensive management of the risks associated with agrichemical management in a “cradle to the grave” sense. The submitter has sought changes to this effect.

#### **RURAL SALES**

The permitted activity status for produce stalls in the Rural Zones and Future Urban Zones is supported. These activities support the vibrancy of the rural economy and are part of the rural character. Invariably produce stalls are also able to provide for a small range of convenience or complimentary products (e.g. milk and bread) without changing the nature or scale of activity.

#### **LABORATORIES/RESEARCH FACILITIES**



The submitter opposes the lack of provision for laboratories and research facilities associated with rural production activities. These activities are an integral component of rural production, require a rural location and access to the rural resources and are necessary to continue to maintain and grow rural production in New Zealand.

#### **SEASONAL LABOUR HOUSING**

The continued viability of the Horticultural sector requires access to labour and the provision where necessary of farm workers accommodation that addresses permanent and seasonal worker accommodation needs. The PAUP does not provide for these activities.

The submitter provides a suggested method that reflects the long standing rule that exists in the Auckland Council District Plan (Franklin Section). The rule provides for more permanent farm workers arrangement where the employee (and family) are required to live on site and short term accommodation in which workers are housed in dormitory or equivalent with only a single kitchen facility accommodating a multiple number of seasonal workers. The post harvest industry has developed a Code of Practice for Seasonal Worker Accommodation which allows for a departure from certain clauses in the Building Act 2004.

Some rural production activities such as crop harvest are short term and labour intensive. Onion and Potatoes harvest for example may require a significant number of seasonal workers to be at a site, working in favourable weather conditions to gather produce for post harvest facilities. Informal camping has been the norm for many years and an appropriate planning response is required to address this activity. Camping associated with seasonal workers should be a permitted activity subject to appropriate conditions covering number of people, location and ablutions.

#### **MICRO ELECTRICITY GENERATION**

The Resource Management Act 1991 identifies the efficiency of the end use of energy and the benefits to be derived from the use and development of renewable energy as 'other matters' that Council shall have regard to under Section 7 of the Act. Small scale micro electricity generation technologies are often used in the rural environment to supplement the energy demand of many rural industries and will likely become even more common in the future. Providing for these activities should be explicit in the PAUP. Refer Auckland Council District Plan (Papakura Section; Plan Change 13) for an example.

#### **ENERGY FROM WASTE**

### **8. DISCHARGES**

The submitter has addressed the discharge provisions broadly to ensure that rural production activities are recognised and provided for, noting that in many instances the rural industries rely on good management practice development for the management of the potential effects of discharges.

## 9. GREENHOUSES

Key to maintaining and supporting growth in the horticultural sector is the need to ensure an appropriate regulatory response that is not inhibiting of greenhouse establishment or activity. Matters to consider include:

- Definitions
- Building size
- Building siting
- Curtilage requirements
- Stormwater management
- Nutrient discharge
- Water takes
- Activity status
- Packing
- Burning of waste oil in greenhouse

### DEFINITIONS

A separate concise definition for Greenhouses is required. The proposed definition of greenhouses requires amendment to exclude Fungi which are not plants and should be classed separately to indoor horticultural plant crops.

The related definition for Horticulture is supported but requires an amendment to refer to *Greenhouses* which are separately defined and included in the Rural Zones activity list. Furthermore, we find no separately listed glass house or shade house activities as suggested in the current definition.

### BUILDING SIZE

The PAUP lists Greenhouses as a permitted activity in the Rural Coastal, Mixed Rural and Rural Production Zones, and a restricted discretionary activity in the Rural Conservation and Countryside Living Zones. This approach is supported, as is the permitted activity for Greenhouses in the Future Urban Zone. There are no size limitations on Greenhouses in these zones and this is supported by the submitter.

### BUILDING SITING

As above, the activity status regime for Greenhouses in the Rural Zones and Future Urban Zone is supported. THE PAUP provides no particular limitations on Greenhouse siting with the exclusion of development setback requirements. This approach is supported by the submitter.

### CURTILAGE REQUIREMENTS

THE PAUP provides no limitations on curtilage associated with Greenhouses in the Rural Zones and Future Urban Zone. This approach is supported by the submitter. Proposed regulator controls to establish curtilage areas (deposition of clean fill material and stormwater management) are addressed elsewhere in this submission.

## **STORMWATER**

The PAUP provides a 1000m<sup>2</sup> limitation for new impervious areas discharging to ground as a permitted activity. Non-compliance is a Restricted Discretionary Activity. Greenhouses are typically larger than this and discharge to pond or tanks systems and the rule will not inhibit Greenhouse establishment or expansion. New uncovered parking including exit and entry points are limited to 1000m<sup>2</sup> as a Permitted Activity with non-compliance a Controlled Activity. This is supported by the submitter.

This is a rural environment characterised by pastoral, arable use, large buildings and large impervious surface areas. The rural environment has large land units within which buildings and impervious surfaces can assimilate and use established stormwater management proactive to avoid adverse effects on the environment. The 5000m<sup>2</sup> limitation on new impervious surfaces in the rural areas with discharges other than to ground soakage is opposed as is the discretionary activity status for the diversion and discharge of stormwater from impervious areas not otherwise authorised by stormwater discharge and diversion rules. There also remains some uncertainty as to the activity status of discharges in the Future Urban Zone which is to remain in rural land use until urbanised.

## **WATER MANAGEMENT**

The submitter has requested comprehensive changes to the water management sections of the plan.

## **ACTIVITY STATUS**

The PAUP lists Greenhouses as a permitted activity in the Rural Coastal, Mixed Rural and Rural Production Zones, and a restricted discretionary activity in the Rural Conservation and Countryside Living Zones. This approach is supported, as is the permitted activity for Greenhouses in the Future Urban Zone.

## **PARKING**

The PAUP provides no minimum rate for parking in the rural zones. This is supported by the submitter. It is not clear if the loading standards apply to rural sites and if they do these should be deleted.

## **10. DEFINITIONS**

Horticulture NZ is concerned about the lack of consistent use of terminology throughout the Unitary Plan.

For instance rural activities, primary production, rural production activities and farming are all used at various places to describe activities undertaken in rural areas. This is complex and confusing, especially since not all the terms are defined.

The definition of farming includes horticulture, but the term farming is usually associated with pastoral farming. It is sought that farming be deleted and replaced with rural production activities.

It is acknowledged that the definition of farming does not include forestry, whereas the definition of rural production activities does. It is not clear if the usage of the terms farming and rural production activities throughout the plan is based on the inclusion or otherwise of forestry.

To be clear it is sought that forestry is included in rural production activities and where forestry is sought to be specifically excluded from a rural production activity it can be stated: Rural production activities (excluding forestry). By taking that approach it will be clear where it is intended to specifically exclude forestry from rural activities.

Activities ancillary to rural production activities should also be provided for as part of the production activity, much as industrial activities have accessory activities. This is important in respect to the application of the terms in assessing reverse sensitivity complaints. If the ancillary activities are specifically listed as part of the rural production activity this can assist in resolving reverse sensitivity complaints.

In addition there are related terms such as greenhouses, packhouses and on-site manufacturing that interface with rural production activities. It needs to be clear as to the status of such activities. Horticulture NZ has sought that packing sheds be replaced with 'post harvest facilities' which are the larger operations which are provided for as separate activities as compared to the smaller packing shed on a property which services the one operation.

In respect of earthworks sometime the term earthworks is used and sometimes land disturbance activities. Horticulture NZ seeks that there is consistent use of land disturbance activities and definition is sought to that effect.

Horticulture NZ also seeks that the terminology used in respect of rural production activities is consistent throughout the Plan and provides for ancillary activities.