

## Chapter: GRUZ – General Rural Zone

Feed-back No.	Section	Sub-section	Plan Provision	Feedback	Relief sought
<a href="#">12.2</a>	GRUZ – General rural zone			<p><i>Request council to reconsider providing rural lifestyle zones of existing farm land at the peripheries of the town centres. Suggest rural lifestyle block be allowed within already cut lifestyle blocks as they have negligible productive values.</i></p> <p><i>So long as people are able to contain own sewage. People can rely on rain water connection. Rates must support increased rubbish collection and road repairs. The market will determine the desired size of lots.</i></p> <p><i>We have an interest in this suggestion as own a 10ha block which isn't allowed to be further subdivided under the current regime yet it has a superb potential building site which can be self serviced and would compromise no one. Yet neighbours are allowed to subdivide three 2 lot blocks in the original subdivision. This all seemed irrational.</i></p> <p><i>Main concern is we need to contain this way of living rather than encoaching on good productive farmland and have people further out of town.</i></p> <p><i>Suggest 2ha is a good size for rural lifestyle block.</i></p>	
<a href="#">141.147</a>	GRUZ – General rural zone			<p><i>Seasonal Workers Accommodation / Workers Accommodation</i></p> <p><i>Horticulture is a labour-intensive industry with seasonal employment peaks at harvest and pruning times. Growers have found it increasingly difficult to recruit a sufficient number of local workers, especially during peak times, and have been heavily reliant on labour from offshore.</i></p> <p><i>The ongoing shortage of seasonal workers prompted the New Zealand Government to introduce the Recognised Seasonal Employer (RSE) scheme in 2007. The aim of the scheme is to help the horticulture and viticulture industries recruit workers from Pacific countries. The RSE scheme is designed to improve the supply of seasonal workers. The Government policy allows the horticulture and viticulture industries to recruit workers from overseas for seasonal work when there are not enough New Zealand workers.</i></p>	

			<p><i>However, as a large majority of the seasonal workers are coming from overseas, they require accommodation while here. Immigration New Zealand (INZ) administer the scheme and has RSE worker accommodation standards that must be complied with to qualify RSE employers to recruit RSE workers.</i></p> <p><i>Seasonal worker accommodation is needed to accommodate these seasonal workers in the horticulture industry. If accommodation is not provided locally, then accommodation will need to be found further afield and workers will be required to commute. Other issue can arise when accommodation options are scarce, such as competition for rental housing and freedom camping. Accommodating seasonal workers appropriate accommodated in close proximity to their places of employment is more efficient for the Horticulture industry, and there are also less impacts on the community.</i></p> <p><i>A number of district plans have taken the approach of providing for such facilities based on a concept of shared kitchen and ablution facilities and separate sleeping quarters. This type of facility is cost efficient and adequately provides for seasonal accommodation.</i></p> <p><i>On orchard camping can also be an appropriate response, subject to conditions covering the number of people, location, parking, access, rubbish and ablutions.</i></p> <p><i>Definition:</i></p> <p><i>Seasonal worker accommodation means the use of land and buildings for the sole purpose of accommodating the short-term labour requirements of a farming activity*, rural industry* or post-harvest facility*.</i></p> <p><i>*terms used here will depend on the definitions in the particular district plan.</i></p> <div data-bbox="734 1152 1458 1343" style="border: 1px solid black; padding: 5px;"> <p><b>Example standards for seasonal worker accommodation</b></p> <p>Permitted activity: Seasonal worker accommodation complying with the following standards:</p> </div>	
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a The relevant Zone standards for yards, height, daylight protection and parking are complied with

a No additional formed accesses are to be created to any State Highway

b Used solely for part of the year to meet labour requirements in the horticulture sector

c Comprise of communal kitchen and eating area and separate sleeping and ablution facilities

d Accommodate up to [number will vary] workers

e Provide 1 parking space per 6 workers to be accommodated

f Complies with Code of Practice for Able Bodied Seasonal Workers, published by Dept of Building and Housing 2008.

Restricted discretionary activity: Seasonal worker accommodation where one or more of the permitted activity standards cannot be met.

Matters of discretion ( [REDACTED] submission on Ōpōtiki District Plan 2016):

- The matters addressed by the permitted activity standards for seasonal workers accommodation that are unable to be met

- Methods to avoid, remedy or mitigate the effects on existing activities, including the

- provision of screening, landscaping and methods for noise control.
- The extent to which the application complies with the Code of Practice for Able Bodied Seasonal Workers, published by Dept of Building and Housing 2008.

*Worker accommodation:*

*While there needs to be caution in providing for new dwellings in rural production areas, farm workers accommodation should be provided for. Its use as farm worker accommodation can be ensured by controlling the use of the dwelling, its size, location and preventing its subdivision and sale.*

*Definition:*

*Worker accommodation means a dwelling 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.*

**Example standards for Farm Workers Accommodation**

(Submission on Proposed Auckland Unitary Plan 2014. The approach was generally accepted by the Independent Hearings Panel, though they reduced the permitted size to 120m<sup>2</sup>)

Farm Workers Accommodation

a) Use of Farm Workers Accommodation

- Only one Farm Workers Accommodation shall be approved on any site and shall be used for the purpose of housing full or part time equivalent employees and their family or seasonal workers, engaged in farming or

horticulture activities on the site, or on sites associated by ownership, lease or contract with the site.

b) Size of Dwelling

- The Farm Workers Accommodation for full or part time equivalent employees and their family, or seasonal workers engaged in farming or horticulture activities shall be no greater than 250 square metres in area excluding decks and garaging.
- The Farm Workers Accommodation may consist of a dormitory or equivalent with only a single kitchen facility accommodating a multiple number of seasonal workers.

c) Location of Dwelling / Eligible Site

- The Farm Workers Accommodation for full or part time equivalent employees and their family or seasonal workers, engaged in farming or horticulture activities shall be located on a site with a size greater than [number will vary] hectares.

d) Dwelling not to be Subdivided

- The Farm Workers Accommodation shall be held in the same certificate of title as the principal dwelling on the site. Subsequent Use of the Dwelling and Ceasing of Consent
- In the event of a Farm Workers Accommodation ceasing to be occupied by the person(s) for which approval was given, then the building shall not be used for any other residential purposes or other activities other than those compliance with the zone provisions or the building

				<p style="text-align: center;">shall be immediately removed from the site or modified to comply as a permitted activity accordingly.</p> <p><i>Regardless of the current New Zealand border restrictions, the Timaru District Plan will provide a planning framework for the community for at least the next decade and therefore, Seasonal Worker Accommodation / Worker Accommodation should be provided for within the General Rural Zone.</i></p>	
<p><a href="#">141.14</a> 8</p>	<p>GRUZ – General rural zone</p>			<p><b>Crop Support Structures and Crop Protection Structures</b></p> <p>Historically, and with changing practice, crop types and diversification in the horticultural sector, growers have become increasingly reliant on a variety of Crop Support Structures (CSS) and Artificial Crop Protection Structures (ACPS) to support rural production activities.</p> <p>ACPS are structures that use permeable materials to cover and protect crops and are now essential for horticulture production of some crops. CSS extend to a variety of structures upon which various crops rely for growth and support and are positioned and designed to direct growth to establish canopies. They include ‘A’, ‘T and ‘Y’ frames, pergolas and fences.</p> <p>Benefits of these structures include; protect fruit from sunburn, windburn and hail, assist with spray coverage, reduce mowing and weeding, assist pruning and picking, and less birds get into the crops.</p> <p>Some ACPS are covered (with cloth) only for part of the year as the cloth will be taken off in winter for longevity reasons. Also, there is no fruit to protect at that time.</p>	

There are a range of resource management and building consent issues that have arisen across the country and it has been [REDACTED] experience that the response by regulatory authorities to these issues has been inconsistent. Much of the inconsistency has arisen from a lack of understanding of the requirements for this form of horticulture and how best to address in district or regional plans and interpreted through the Building Act.

From a resource management perspective, the [REDACTED] has consistently sought that planning frameworks should differentiate between Greenhouses which are a totally enclosed structure where plants are grown in a controlled environment, and other forms of crop cover that are permeable and rainfall passes through, being ACPS.

Land use controls imposed by district plans have the most direct impact on the resource management regulatory framework for CSS and ACPS. It is here that growers typically have interaction and issues with the regulatory authority.

In the past District Plans often rely heavily on a definition of Building, upon which land use activity controls, development and performance standards rely. The definitions are usually broad, catch all statements that are invariably (rightly or wrongly) interpreted by planners to capture Crop Support Structures and Artificial Crop Protection Structures. In doing so these structures often become subject to rules covering: yard setbacks, height limitations, height to boundary controls, building coverage limitations, impervious surface limitations, amenity controls (colour, reflectivity), buildings and structures in areas prone to natural hazards, buildings and structures in ONFLs, national grid provisions. We note that the New Zealand Planning Standard now include a definition of Building. However, we still envisage similar issues with definition interpretation.

██████ would like to work with Timaru District Council to appropriately provide for these structures in the General Rural Zone. The table below provides a high-level outline of what we seek.

<b>Objectives</b>	A range of rural production activities are provided for and enabled in the General Rural Zone.
<b>Policies</b>	Enable the continuation of rural production activities and the construction of accessory buildings and ancillary structures for farming purposes. Recognise that a range of buildings and structures accessory to farming and forestry, and other operational structures for rural production activities are an integral part of rural character and amenity values.
<b>Methods/rules</b>	Permitted activities: <ul style="list-style-type: none"> <li>Structures ancillary to farming activities including artificial crop protection structures and crop support structures.</li> </ul>
<b>Definitions</b>	██████ prefer clear definitions in a District Plan for CSS and ACPS.

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*Horticulture and Biosecurity*



	al rural zone		<p>██████ seeks that the District Plan include provisions for removal and disposal of infected material in the event of an incursion of unwanted organisms under the Biosecurity Act 1993, as District Plans can be a regulatory hurdle to rapid response to such incursions.</p> <p><i>Biosecurity risks to primary production activities are significant and could have serious impact on both urban and rural communities, particularly the production of food. If an incursion of an unwanted organism was unable to be appropriately managed due to regulatory barriers in the district plan it could have significant impact on the rural economy.</i></p> <p><i>It should also be noted that biosecurity is not just a rural production issue as unwanted organisms can also affect the conservation estate and indigenous biodiversity – such as the recent incursion of myrtle rust.</i></p> <p><i>There needs to be active management to ensure that threats do not enter the country and if they do that pest incursions are able to be addressed.</i></p> <p><i>While biosecurity is generally managed under the Biosecurity Act, there is an interface with the RMA so the Plan has a role to play in respect of managing biosecurity risks.</i></p> <p><i>Regional Councils develop plant and animal pest management strategies that address known pests that are present in NZ. However unwanted organisms are not currently found in NZ so are not identified in regional pest management strategies or the National Pest Plan Accord.</i></p> <p><i>In the event of a biosecurity incursion of an unwanted organism a rapid response to manage spread is necessary. Vegetation removal, burial, burning, spraying of material are methods that may be used, including in riparian areas.</i></p> <p><i>It became evident through the PSA incursion in the kiwifruit industry that District Plans could be a hurdle in such responses so ████████ now seeks provisions to ensure that such hurdles do not exist in district plans.</i></p> <p><i>The Biosecurity Act does not override the RMA unless an emergency is declared by the Minister. There has never been an emergency declared, even with PSA or fruit fly incursions. In other situations, a declaration is made by the Chief Technical Officer of Ministry of Primary Industries (MPI).</i></p>	
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*However, this declaration does not override the RMA so the District Plan rules need to be complied with and district plan rules need to be met in terms of disposal of infected material. Given the urgency required it is not practical to have to obtain resource consent. Therefore, provisions need to be included in the Plan to enable disposal or treatment of infected material to be undertaken in response to a biosecurity incursion of an unwanted organism. The table below provides a high-level overview what we seek.*

<b>Objective:</b>	To minimise the risk of biosecurity incursions in the district and enable response to any biosecurity incursions.
<b>Policy:</b>	<p>Enable disposal of material infected by unwanted organisms for biosecurity purposes and treatment of areas to manage incursions of unwanted organisms.</p> <p>Add the following explanation in the Plan:</p> <p>A Biosecurity incursion could have devastating effects on the wellbeing of the district, particularly the horticultural industry. While incursions are managed under the Biosecurity Act, Council has a role in ensuring that land use activities do not increase the risk in facilitating incursions and to ensure there are not regulatory barriers to the management of incursions, such as burial or removal of infected plants or animals.</p>
<b>Rules:</b>	
<b>Earthworks</b>	Provide as a permitted activity: Earthworks for burying of material infected by unwanted organisms as declared by MPI Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993.
<b>Vegetation removal</b>	Provide as a permitted activity: Removal of material infected by unwanted organisms as declared by MPI Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993.

				<p>Ensure that there are provisions in the Plan for the removal of material infected by unwanted organisms from riparian areas.</p> <p>Alternatively: Include a new section under Hazards and Risks as set out in Attachment A below.</p>					
<a href="#">141.14</a> <a href="#">9</a>	GRUZ – General rural zone			<p><i>Greenhouses</i></p> <p><i>Greenhouses are a totally enclosed structure made of impermeable material (glass, plastic) where plants are grown in a controlled environment. [REDACTED] has consistently sought that planning frameworks differentiate between Greenhouses and other forms of crop cover that are permeable and rainfall passes through (i.e. Artificial Crop Protection Structures).</i></p> <p><i>[REDACTED] would like to work with Timaru District Council to appropriately provide for these structures in the General Rural Zone. The table below provides a high-level outline of what we seek.</i></p> <table border="1"> <tr> <td><b>Objectives</b></td> <td>A range of rural production activities are provided for throughout rural area.</td> </tr> <tr> <td><b>Policies</b></td> <td> <p>Enable the establishment of new greenhouses and the expansion of existing greenhouses in specific locations where there are advantages for operational efficiencies, transport accessibility and the provision of energy such as natural gas supplies and services, and manage the amenity expectations of other activities in these areas.</p> <p>Recognise that a range of buildings and structures accessory to farming and forestry, and other operational structures for rural production activities are an integral part of rural character and amenity values.</p> </td> </tr> </table>	<b>Objectives</b>	A range of rural production activities are provided for throughout rural area.	<b>Policies</b>	<p>Enable the establishment of new greenhouses and the expansion of existing greenhouses in specific locations where there are advantages for operational efficiencies, transport accessibility and the provision of energy such as natural gas supplies and services, and manage the amenity expectations of other activities in these areas.</p> <p>Recognise that a range of buildings and structures accessory to farming and forestry, and other operational structures for rural production activities are an integral part of rural character and amenity values.</p>	
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<a href="#">28.12</a>	GRUZ – General rural zone		GRUZ-O2 Character and qualities of the Gener	<table border="1"> <tr> <td>We support this objective as it recognises that activities within the rural environment generate noise, odour and traffic effects that may not be considered appropriate in zones with more sensitive activities present.</td> </tr> </table>	We support this objective as it recognises that activities within the rural environment generate noise, odour and traffic effects that may not be considered appropriate in zones with more sensitive activities present.				
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<a href="#">28.6</a>	GRUZ – General rural zone		GRUZ-O3 Protection from inappropriate activi	<p><i>This objective lacks a clearly stated intent as the phrase inappropriate activities is vague.</i></p> <p><i>Should the suggested above wording to replace GRUZ-01 be adopted, subpart (3) would provide an objective that seeks to avoid primary production activities being compromised, constrained, or curtailed by the more recent establishment of sensitive activities.</i></p> <p><i>Recommendation:</i></p> <p><i>Strengthen Objective GRUZ-O3 by adding the following policy:</i></p> <p><i>GRUZ-P10</i></p> <p><i>Avoid reverse sensitivity effects on lawfully established primary production activities.</i></p>					
<a href="#">28.11</a>	GRUZ – General rural zone		GRUZ-O1 Purpose of the General rural zone	<table border="1"> <tr> <td>The DDP states <i>the land resource in this zone underpins the economic, social and cultural wellbeing of the District.</i></td> </tr> </table>	The DDP states <i>the land resource in this zone underpins the economic, social and cultural wellbeing of the District.</i>				
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As such, we consider that this policy should be strengthened, given the significance of the rural zone in maintaining the overall wellbeing of the district.

Poultry operations have a requirement to be located in or near rural areas to minimise the perceived environmental effects generated by poultry farms. There are also specific requirements for poultry operations to be located near the market for their product to avoid unnecessary travel for animal welfare reasons. The operations of the poultry industry can therefore be characterised by the need to be in rural areas within a reasonable distance to the urban population.

It is preferred that the first objective of the rural zone prioritises primary production in the rural zone over other activities to reinforce its importance to the economy and wellbeing of the district.

Suggested wording:

GRUZ-O1: Subdivision, use, and development in rural areas that:

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				<p><u>1. supports, maintains, or enhances the function and form, character, and amenity value of rural areas;</u></p> <p><u>2. prioritises primary production, over other activities to recognise its importance to the economy and wellbeing of the district.</u></p> <p><u>3. allows primary production to operate without being compromised by reverse sensitivity.</u></p>	
<a href="#">28.4</a>	GRUZ – Gener al rural zone		Rules	<p><i>Not included as permitted activities:</i></p> <p><i>Free-range poultry farming</i></p> <p><i>Intensive primary production</i></p> <p><i>It is essential to the functioning of the rural district and the industries within it that activities such as free range poultry farming and intensive primary production are permitted to occupy the rural zone.</i></p> <p><i>It is considered that intensive farming, including poultry farming, is an agricultural activity because it is the practice of farming and the rearing of animals to provide food. Furthermore, the term primary products in the RMA includes agricultural products, of which the products created by intensive farming are a sub-set. By nature, intensive farming activities need to be located and permitted in rural areas and away from urban and residential activities to manage potential adverse effects, including odour, noise and reverse sensitivity.</i></p>	
<a href="#">28.13</a>	GRUZ – Gener al rural zone		GRUZ-R1 Farming	<p><i>Including farming instead of primary production as a permitted activity does not provide a strong planning framework for the rural zone.</i></p>	

			<p><i>Primary Production activities cannot locate anywhere else in the district. Furthermore, the purpose of the rural zone is to provide for primary production activities, as stated in GRUZ-O1.</i></p> <p><i>We recommend replacing GRUZ-R1 with:</i></p> <p><i>GRUZ-R1 Primary production activities.</i></p>	
<a href="#">102.2</a>	GRUZ – General rural zone	General	<p><i>Rural Zone and Reverse Sensitivity</i></p> <p><i>The Introduction of the dDP recognises that Timaru District contains a large proportion of New Zealand’s high-class productive soils, Class 1 – 3 under the Land Use Capability (LUC) classification system and that these soils are highly productive for a range of primary industries. The dDP also recognises that recent development patterns, in particular the increased popularity of rural lifestyle blocks, has resulted in the fragmentation of rural land and loss of productive land. The dDP recognises that this development pattern and urban creep into areas that have traditionally been farmed can cause potential conflict between landowners. It recognises the need for a balance between these activities to maintain the ability of farming activities to continue in the environment is identified.</i></p> <p><i>██████████ support Timaru District Council in their intent to identify and protect versatile soil through the LUC system. We encourage landowners to understand the LUC of their property at the Farm Scale for nuanced management and to ensure landowners are farming within the natural capacity of the land.</i></p> <p><i>However we consider that the recognition for LUC soils 1-3 is not adequate to protect productive soils. Timaru district is defined by agricultural land in pasture. This contributes a very large part of the character and natural values of the area, but is often not on LUC1-3 land. Drystock farms in particular are less likely to include LUC1-3 land. The dDP thus allows</i></p>	

			<p><i>the pastoral sector to slip through the cracks by providing inadequate protection for pastoral land. ██████████ recommend that this is addressed.</i></p> <p><i>Drystock land is productive land. This is true regardless of whether the farming system is intensive or extensive, on LUC 1 or LUC 7 soils, and tends to reflect the people who farm the land rather than just the land itself. Drystock land is also valuable land. The sector is economically important at both the regional and national scale, and the sheep and beef sector employed 92,000 full time equivalent roles nationally last year.</i></p> <p><i>More than economic benefits, drystock farmers are active participants in their communities, and sheep and beef farms are host to 2.8million <a href="#">[1]</a> hectares of native biodiversity, including 1.4million hectares of native forest. This is the second largest holding of native forest and native biodiversity – bettered only by the Crown estate. In some regions, such as the East Coast, there is more native biodiversity on sheep and beef farm land than in the Crown estate. Added to this is an estimated 180,000 hectares of forestry blocks. Sheep and beef farms are able to integrate indigenous biodiversity into their systems and contribute to net fauna and flora in their catchment and region.</i></p> <p><i>It is important that drystock systems in the rural zone are protected from loss of productive land due to reverse sensitivity effects.</i></p> <p><i>To this end, ██████████ support objective GRUZ-O3 Protection from Inappropriate Activities, GRUZ-P9 Inappropriate or Incompatible Activities and GRUZ-P5 Other Activities and recommend that they are given substantive effect to throughout the dDP.</i></p> <p><i>It is important to inform and educate the public on what effects can be typically anticipated by, and importantly are in fact integral to, the purpose and function of productive land use. ██████████ that consider those choosing to live near rural zones have a responsibility to understand the character and qualities of their productive function. The dDRP is an opportunity to facilitate this greater understanding and in doing so is likely to see better outcomes and a more harmonious relationship between various zones and land use functions.</i></p> <p><i>As currently drafted, we do not consider the dDP adequately provides for and safeguards the function and purpose of the rural zone and places disproportionate onerous on farmers to address reverse sensitivity issues by including impractical Standards. This approach is not</i></p>	
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<p><a href="#">141.14</a> <a href="#">2</a></p>	<p>GRUZ – General rural zone</p>	<p>General</p>	<p><i>The provisions that apply to the GRUZ provide ██████ the greatest concern. Given the drafting errors that have become apparent, rather than providing comment on individual provisions, we provide the following overarching comments:</i></p> <p><i>It is important to set clear expectations of rural character, which includes production related activities – linked to the issue or reverse sensitivity matter. Reverse sensitivity issues are becoming an increasing problem as more people move into productive areas who do not have realistic expectations with regards to the noise that can occur as a result of primary production activities. It is clear from the draft plan that Timaru District is no exception, however, the provisions as drafted favour the new comer – the residential unit – not the lawfully existing primary production activity. The General Rural Zone is the only location for primary production activities in the District. Residential activities can locate in multiple zones, which all have differing character and amenity. Any residential activities locating in the General Rural Zone cannot expect or demand the amenity as other zones that provide for residential units.</i></p> <p><i>██████ seeks policy that clearly articulates the elements of ‘rural character and amenity’ to provide clarity when considering effects on character and amenity and in determining extent of adverse effects. It is important to set clear expectations of rural character, which includes production related activities.</i></p> <p><i>██████ support retaining open character as part of rural character, but it also needs to be accepted that some buildings and structures for primary production activities do exist in the environment and it is necessary that they locate there.</i></p> <p><i>██████ also seeks that Crop Support Structures, Artificial Crop Protection, Greenhouses and Seasonal Workers Accommodation are specifically provided for in the General Rural Zone as they are important to enable horticultural activities. We have provided an explanation of these in the body of the submission.</i></p> <p><i>There are a number of non-primary production permitted activities that are provided for in the GRUZ that ██████ have concerns about, in particular the rule thresholds and standards that apply to them.</i></p>	<p>██████ would appreciate the opportunity to assist Council in ensuring that further drafting errors are not carried through to the proposed plan., therefore we seek a collaborative drafting workshop with Council Policy Planners to address our concerns.</p>
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<a href="#">143.64</a>	GRUZ – General rural zone	General	<ul style="list-style-type: none"> <li>· <i>The Draft Plan also proposes to simply the Rural Zones in Timaru, minimising the number of zones from five to three. The three Rural Zones in the draft plan are the:</i></li> <li>· <i>General Rural Zone (GRUZ);</i></li> <li>· <i>██████████ supports the envisaged outcomes for the Rural Zones under the Draft Plan, which largely discourage residential intensification outside of ‘urban zones’, due to limitations of the existing infrastructure network.</i></li> </ul> <p><i>██████████ support the intensions of the Council in protecting a large portion of land for rural activities. However, we would recommend/question as to spatial application of the Rural Lifestyle Zone and why the majority of land zoned as RLZ is to the north of Timaru city, while land to the south is typically zoned Rural General.</i></p> <ul style="list-style-type: none"> <li>· <i>Rural Lifestyle Zone (RLZ); and</i></li> <li>· <i>Settlement Zone (SETZ).</i></li> </ul> <p><i>General Rural Zone</i></p> <ul style="list-style-type: none"> <li>· <i>The GRUZ is the largest zone in the district. The land resource in this zone underpins the economic, social and cultural wellbeing of Timaru.</i></li> </ul>	No request

				<ul style="list-style-type: none"> <li>· <i>The objectives and policies for the GRUZ typically seek to protect the land for rural production activities, while enabling supporting activities that support and are compatible with such rural activities.</i></li> <li>· <i>Residential units are a permitted activity within the zone, at a density of one unit per 40 hectares, and there are no more than two dwellings on a single site.</i></li> <li>· <i>The GRUZ does also include a future urban precinct in Geraldine. This precinct seeks to protect this land from inappropriate subdivision, use or development that would inhibit the area’s potential for future urban use. The objectives, policies and rules for the precinct would override those of the GRUZ where a conflict arises. There are no conflicts relating to residential activities.</i></li> </ul>	
<a href="#">66.7</a>	GRUZ – General rural zone	General	General	<p><i>The draft plan notes that the purpose of the general rural zone is to “provide primarily for primary production as well as a limited range of activities that support primary production, and other activities that require a rural location”. While the policies and rules within the plan which are relevant to the general rural zone need to support and enable this purpose, there may be areas within the zone where specific controls are required for whatever reason.</i></p> <p><i>Farming is a permitted activity within the General Rural Zone, provided the specified performance standards are met. If the standards are not met, the activity becomes a restricted discretionary activity. The standards specified (setbacks) would greatly limit existing farming activities. We understand that some of the setbacks in the draft were not intended to be applied where they have been applied.</i></p> <p><i>It is sought that the setbacks specified in the standards be reviewed, particularly with regard to existing activities, and how various matters are defined.</i></p>	
<a href="#">93.10</a>	GRUZ – General rural zone	General	General	<p><i>Land to the west and north is zoned General Rural Zone (GRUZ). This reflects the historical rural zoning that has applied to the land, in place as a ‘buffer’ between the GIZ and [REDACTED] activities in this location and surrounding land.</i></p> <p><i>While a useful intent, the GRUZ description, objective, policy and rule structure appears an uncomfortable fit with the GRUZ in this location isolated from other rural land being land locked by urban zones. The approach may be vulnerable to change through the plan change process and difficult to defend in the future from plan change requests and resource consent</i></p>	

				<p>applications for alternative use that may conflict with █████ activity. The risk is the potential for sensitive activities using or establishing in the zone that may conflict with █████ current activities and potential changes.</p> <p>█████ notes that alternatives may need to be considered including a precinct for the site and surrounds. A precinct to define a particular rule framework for the site and provide certainty for current activity and future changes.</p>	
<a href="#">100.43</a>	GRUZ – General rural zone	General	General	<p>The majority of Timaru District’s land is zoned rural and the productive use of rural land underpins the social, economic, and cultural well-being of the people of the District.</p> <p>While it is important for our rural areas to keep looking and feeling rural and for productive land to be kept available for food production into the future, there is also a need to provide landowners with the ability to be innovative, adaptative and flexible as to how they use their land.</p> <p>Earthworks is an essential activity for farming operations; these include but are not limited to the cultivation of land, the maintenance and construction of tracks, access roads and fence-lines, buildings and cleaning stock water dams and clearing sites for new buildings and structures. Many of these activities will be subject to careful scrutiny and we caution full consideration of the need for these activities in a rural context.</p> <p>An example we’ve recently grappled with in other areas is where earthworks and vegetation clearance is necessary to enable fencing to be put in alongside waterways (as part of national stock exclusion regulations), yet farmers are prevented from doing so under District Plan rules. There must be a common-sense approach to ensure any activities required from farmers as part of other obligations, cannot be prevented or restricted under the Timaru District Plan rules.</p> <p>We would strongly support an approach in response to the raft of national regulations coming out of central government that would work these through with the District’s communities, iwi, and industry to give effect to this in the new plan, while providing for the future needs of our District.</p>	

<p><a href="#">125.1</a></p>	<p>GRUZ – Gener al rural zone</p>	<p>General</p>	<p>General</p>	<p><i>We oppose the following provisions in the Draft District Plan with regard to [REDACTED] which is in the [REDACTED] Development Outline Plan area and zoned Residential 4 in the current District Plan.</i></p> <p><i>It is proposed this area be rezoned to General Residential if the Draft District plan goes ahead and will allow the following changes which we believe will drastically change the look and feel of our area.</i></p> <ol style="list-style-type: none"> <li><i>1. Subdividable lot size is currently 1,500m2 and would change to 450m2 and possibly smaller if granted via Resource Consent.</i></li> <li><i>2. Dwelling Density - If small lot sizes are allowed the possible development of subdivisions and increased density of dwellings and accesory buildings will totally change the area and busyness of [REDACTED] and the surrounding area.</i></li> <li><i>3. Amenity planting, we have seen from the [REDACTED] subdivision at the end of our road and also further up [REDACTED] that there is not much amenity planting. The removal of large trees which are not replanted after the subdivision is complete of is of great concern to us.</i></li> <li><i>4. Dwelling Height - Currently a maximum of 8 metres high, it is proposed that dwellings can be up to 10 metres high in the proposed new zone. Combine this with the smaller lot sizes, we believe the view that current property owners enjoy will disappear and there won't be any affected party approval required as all will be allowed under the new plan.</i></li> <li><i>5. Animals - We are currently allowed sheep, cows, hens, alpaca, donkeys, horses etc, this will change in the new General Residential zone. We will have apply and pay to get Existing Use Rights granted to keep our current pets.</i></li> </ol> <p><i>We purchased our property at [REDACTED] because the lot sizes are generally large here; we have 3 acres which allows us to have privacy, relative peace and quiet, a large garden and space for a few pets and animals to graze and we enjoy not being totally surrounded by close neighbors. We moved away from a large city and chose here for these reasons and now this could all change and everything we didn't want may become our new surroundings. We are alarmed to say the least.</i></p> <p>[REDACTED]</p>	
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<a href="#">100.45</a>	GRUZ – General rural zone	GRUZ-P4 Factory farming, intensively farmed stock and rural industry	General	<i>GRUZ-P4 oppose. As outlined in the definitions section “factory farming” and intensively farmed stock” are terms that should not be used in a district plan. This policy is not required as it is a duplicate of P1 Rural and rural-related activities.</i>	
<a href="#">100.46</a>	GRUZ – General rural zone	GRUZ-P5 Other activities	General	<i>GRUZ-P5 support. This provides a level of protection to the rural zone around reverse sensitivities from new activities, especially those that have no functional need to be located in the rural zone.</i>	
<a href="#">100.47</a>	GRUZ – General rural zone	GRUZ-R11 Airstrips used for private purposes excluding helicopter landing sites	General	<i>GRUZ-R11: PER-1 Oppose. If a farmer is topdressing restricting the number of take-offs or landings from the airstrip to 8 per day means a maximum of four flights. This is inefficient and makes the practice of topdressing uneconomic which is a contradiction of the enabling premise of Objective 2 and Policy 1.</i>  <i>██████████ seeks an exemption for all take-offs and landings related to primary production activities for fixed wing aircraft and helicopters. As these events are sporadic and usually happen in relation to the weather they cannot be scheduled weeks in advance.</i>	
<a href="#">100.48</a>	GRUZ – General rural zone	GRUZ-R13 Farm quarries up to 2,000m <sup>2</sup>	General	<i>GRUZ-R13: oppose in part. As explained elsewhere this rule should not apply to VALs and the blanket application of SASMs is inappropriate. There are five different categories of SASMs, each with different criterion of acceptable use.</i>	

				<i>Also, the activity status of permitted to non-complying is not appropriate, should be restricted discretionary or discretionary, which also aligns with the other rural rules.</i>	
<a href="#">100.49</a>	GRUZ – General rural zone	GRUZ-R19 Rural industry other than rural produce manufacturing	General	<p><i>GRUZ-R19 oppose, should be a permitted activity not discretionary. “Rural Industry” means an industry or business undertaken in a rural environment that directly supports, services, or is dependent on primary production.</i></p> <p><i>This rule is a contradiction of Objective 1 which states the purpose of the general rural zone and provides for primary production and activities that support primary production.</i></p>	
<a href="#">100.50</a>	GRUZ – General rural zone	GRUZ-S2 Setbacks from residential units	General	<i>GRUZ-S2 clarification is needed regarding what ‘storage pond’ covers. If it is for an irrigation storage pond then the proposed standard is excessive and unnecessary, if it is for an effluent storage pond then it is more reasonable.</i>	
<a href="#">100.51</a>	GRUZ – General rural zone	GRUZ-S3 Setbacks from boundaries	General	<i>GRUZ-S3 oppose. Current setbacks are 5m from a road and 3m from internal boundaries, there must be a strong case to alter these setbacks, not a handful of anecdotal complaints. There needs to be a real problem district wide for these to be changed. Farm buildings such as pump sheds and farm sheds are placed for logistical and efficiency reasons not just plonked anywhere.</i>	
<a href="#">100.52</a>	GRUZ – General rural zone	GRUZ-S4 Intensively farmed stock and stock building setbacks from boundaries	General	<p><i>GRUZ-S4 oppose in part. We note the Council’s recent acknowledgement that this proposal was in error, and the consequent assurance that there would be an amendment to ensure that intensively farmed stock setbacks would be removed from this standard. However, the definition for stock holding area will capture areas used for calf rearing, as this is a seasonal activity it should also be excluded from the setback requirements.</i></p> <p><i>It is unclear why 400m from residential units on an adjoining site is required, when under GRUZ-S2 300m is considered adequate for effluent holding tanks, silage pits etc.</i></p> <p><i>We seek the setback is changed to 300m to align with GRUZ-S2, in doing GRUZ-S4 would not be required.</i></p>	
<a href="#">100.53</a>	GRUZ – Gener	GRUZ-S6 Home business	General	<i>GRUZ-S6 oppose. We do not believe the Council should restrict the staff numbers for home businesses in the rural zone. As long as the business meet Health and Safety and Employment laws, this standard is unnecessary.</i>	





			<p><i>In the Timaru District, ██████████. In addition, many other jobs are supported through the use of subcontractors and other subsidiary services. The company has a proud history of road and infrastructure construction and maintenance within a diverse operational portfolio. Core operations include Major Projects, Asset Management, Manufacturing, Contracting, Industries and Land Development.</i></p> <p><i>██████████ extracts and processes aggregates from several land-based quarries across the South Canterbury area. A significant investment has been made in acquiring, consenting and providing infrastructure to operate these assets. ██████████ also relies on river-based (fluvial) aggregate resources to supplement these quarries, although this resource is under pressure or in decline in some areas. Road maintenance (for both local authorities and NZTA), infrastructure construction (bridges, underground services, water supply and sewage treatment, etc.) and facilities maintenance (airports, ports, rail, for example) all rely on the availability of a suitable aggregate resource in relatively close proximity to demand.</i></p> <p><i>Cleanfilling and remediation of land-based quarry sites also occurs behind, but generally in tandem with, extraction. This element of ██████████ operations provides a valuable, if largely invisible, service by allowing surplus topsoil and excavated material from construction and land development activities to be disposed of in a managed way.</i></p> <p><i>To complement the company's business needs, ██████████ also manufactures products which are used in day-to-day business, major projects, and by clients. These include quarry products (aggregates – both "raw" and processed), and "downstream" commodities such as asphalt, precast concrete and concrete aggregates, emulsions, bitumen, biodiesel, road signage and associated products.</i></p> <p><i>This diverse portfolio is solely reliant on the availability of a suitable aggregate supply.</i></p> <p><i>For context, it should also be noted that aggregates are an essential building block for people and communities. Without aggregates, public and private roading, buildings, infrastructure (including critical infrastructure), and public and private development would not be possible. In short, the availability of aggregates is fundamental to the sustainable management of people and communities, as set out in the purpose of the Resource Management Act 1991.</i></p>	<p>recognised, and provided for within the Draft District Plan (DDP). Quarrying and gravel extraction is an appropriate and legitimate land use within the Rural Zone (as opposed to Residential, Commercial and Industrial Zones). It is acknowledged that this must occur within the RMA framework to mitigate adverse environmental effects, but noted that quarrying activities – both river and land-based - (as defined in the DDP) are a legitimate and essential rural land use within the Rural Zone, alongside farming and other rural-based activities. Fluvial gravel extraction often delivers multiple benefits including aggregate supply, braided river habitat enhancement and flooding mitigation; this should be recognised and provided for.</p>
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<p><a href="#">129.25</a></p>	<p>GRUZ – General rural zone</p>	<p>Objectives</p>	<p>GRUZ-O5 Mining and quarrying Mining a</p>	<p><i>Objective GRUZ-O5, and Policies GRUZ-P1, P5, and P6 – Objective GRUZ-O5 reads more as a policy than objective. By its nature, mining and quarrying should occur only within the rural zone, as the activity is compatible with rural-type land uses. It is also acknowledged, however, that the location of such activities within the zone should be appropriate; such sites typically need good separation from surrounding sensitive activities and are subject to the existence of an appropriate mineral resource. However, the very nature of these activities results in a temporary disruption to the qualities and amenity values of the immediate surrounds until remediation is complete; on this basis, these qualities are not “maintained” as sought. Moreover, on occasion, it may be appropriate to convert an extraction area to a water storage reservoir, wetland, pond or lake on completion, rather than return the land to its previous state. For these reasons, greater flexibility in the objective and policy regime is sought to recognise and provide for quarrying and mining in the GRUZ.</i></p> <p><i>A further matter of concern is the provision for private “farm quarries” (see, for example, policies GRUZ-P1 and GRUZ-P7, and rule GRUZ-R13). If the plan seeks to address environmental effects, there should be no distinction between “farm” and “general” quarries as it is the effects that should be addressed. Accordingly, the reference to “farm” quarries should be deleted and replaced with control allowing all small scale quarries more generally, whether or not the material extracted is used within the source property.</i></p> <p><i>As a final note, the wording of policies GRUZ-P5 and P6 are considered to be problematic. For example, P5 uses the term “...not adversely impact...”, whereas the RMA concerns itself with adverse environmental effects. This wording should be amended to reflect the proper concerns of the RMA. In relation to GRUZ-P5 and P6, these both begin with the very restrictive and narrow word “Only” in relation to other activities and mining and quarrying. Such an approach is considered to be too restrictive and unjustified. It also requires protection of some values, and avoidance or mitigation of effects on sensitive activities. While it is accepted that adverse environmental effects must be managed, this approach is considered to be too blunt and limiting, and does not provide for the full range of avoid, remedy and/or mitigation of effects, as contemplated by the RMA.</i></p>	<p>Relief sought – Amend the bundle of GRUZ objectives, policies and rules in the manner described above. This includes providing for all quarries by amending the rules attached to farm quarries to allow that any quarry up to 2,000m2 may occur as a Permitted Activity. Delete the words “Only” from the beginning of policies GRUZ-P5 and P6. Amend the Objective regime to acknowledge that mining and quarrying is an appropriate land use within the GRUZ, provided that the effects of these activities are appropriately avoided, remedied or mitigated. Amend Rule GRUZ-R1 to include farming and existing authorised quarrying as a Permitted Activity.</p>
<p><a href="#">38.1</a></p>	<p>GRUZ – Gener</p>	<p>Objectives</p>	<p>GRUZ-O1 Purpose of the</p>	<p>Issue</p>	

	al rural zone		General rural zone	<p><i>GRUZ -01 and GRUZ-03 refer to the purpose of the zone being to “provide primarily for primary production” and “the purpose, character and qualities of the General Rural Zone, and the use of soils for primary production, is not compromised by inappropriate activities”. It therefore makes no sense to us that further provisions within the plan seriously undermine the ability of landowners to use the soils for primary production.</i></p> <p><i>Outcome We Seek</i></p> <p><i>We strongly encourage the council to ensure that any provisions relating to the General Rural Zone seek to provide primarily for primary production.</i></p> <p><i>seek to provide primarily for primary production.</i></p>	
<a href="#">131.2</a>	GRUZ – General rural zone	Objectives	GRUZ-O1 Purpose of the General rural zone	<p><i>GENERAL RURAL ZONE</i></p> <p><i>The draft plan refers to the GRUZ’s purpose being to “provide primarily for primary production”, however provisions within the plan (eg: setbacks, intensively farmed stock) seem in direct contrast to the landowner being able to use their land for this purpose. We encourage the TDC to ensure that all provisions within the Draft district plan strive to provide primarily for this said primary production of the land.</i></p>	We encourage the TDC to ensure that all provisions within the Draft district plan strive to provide primarily for this said primary production of the land.
<a href="#">100.44</a>	GRUZ – General rural zone	Objectives	General	<p><i>GRUZ-O1-5 support. These objectives outline why primary production is important to the Timaru District and why it needs to be supported.</i></p>	
<a href="#">132.2</a>	GRUZ – General rural zone	Objectives	General	<p><i>Issue</i></p> <p><i>GRUZ -01 and GRUZ-03 refer to the purpose of the zone being to “provide primarily for primary production” and “the purpose, character and qualities of the General rural zone, and the use of soils for primary production, is not compromised by inappropriate activities”. It therefore makes no sense to us that further provisions within the plan seriously undermine the ability of landowners to use the soils for primary production.</i></p>	We strongly encourage the council to ensure that any provisions relating to the General Rural Zone seek to provide primarily for primary production.

43.111	GRUZ – General rural zone	Policies	GRUZ-P1 Rural and rural-related activities	<p><i>Retain as proposed or preserve the original intent.</i></p> <p><i>Note: This policy sets out what will be enabled in the General rural zone and what conditions are required to be met.</i></p>	
129.26	GRUZ – General rural zone	Policies	GRUZ-P1 Rural and rural-related activities	<p><i>Objective GRUZ-O5, and Policies GRUZ-P1, P5, and P6 – Objective GRUZ-O5 reads more as a policy than objective. By its nature, mining and quarrying should occur only within the rural zone, as the activity is compatible with rural-type land uses. It is also acknowledged, however, that the location of such activities within the zone should be appropriate; such sites typically need good separation from surrounding sensitive activities and are subject to the existence of an appropriate mineral resource. However, the very nature of these activities results in a temporary disruption to the qualities and amenity values of the immediate surrounds until remediation is complete; on this basis, these qualities are not “maintained” as sought. Moreover, on occasion, it may be appropriate to convert an extraction area to a water storage reservoir, wetland, pond or lake on completion, rather than return the land to its previous state. For these reasons, greater flexibility in the objective and policy regime is sought to recognise and provide for quarrying and mining in the GRUZ.</i></p> <p><i>A further matter of concern is the provision for private “farm quarries” (see, for example, policies GRUZ-P1 and GRUZ-P7, and rule GRUZ-R13). If the plan seeks to address environmental effects, there should be no distinction between “farm” and “general” quarries as it is the effects that should be addressed. Accordingly, the reference to “farm” quarries should be deleted and replaced with control allowing all small scale quarries more generally, whether or not the material extracted is used within the source property.</i></p> <p><i>As a final note, the wording of policies GRUZ-P5 and P6 are considered to be problematic. For example, P5 uses the term “...not adversely impact...”, whereas the RMA concerns itself with adverse environmental effects. This wording should be amended to reflect the proper concerns of the RMA. In relation to GRUZ-P5 and P6, these both begin with the very restrictive and narrow word “Only” in relation to other activities and mining and quarrying. Such an approach is considered to be too restrictive and unjustified. It also requires protection of some values, and avoidance or mitigation of effects on sensitive activities. While it is accepted that adverse environmental effects must be managed, this approach is considered to be too blunt and limiting, and does not provide for the full range of avoid, remedy and/or mitigation of effects, as contemplated by the RMA.</i></p>	<p>Relief sought – Amend the bundle of GRUZ objectives, policies and rules in the manner described above. This includes providing for all quarries by amending the rules attached to farm quarries to allow that any quarry up to 2,000m<sup>2</sup> may occur as a Permitted Activity. Delete the words “Only” from the beginning of policies GRUZ-P5 and P6. Amend the Objective regime to acknowledge that mining and quarrying is an appropriate land use within the GRUZ, provided that the effects of these activities are appropriately avoided, remedied or mitigated. Amend Rule GRUZ-R1 to include farming and existing</p>

					authorised quarrying as a Permitted Activity.
<a href="#">38.3</a>	GRUZ – General rural zone	Policies	GRUZ-P4 Factory farming, intensively farmed	<p><i>Issue</i></p> <p><i>GRUZ-P4 refers to, amongst other things, intensively farmed stock. The definition of intensively farmed stock as it is included in the draft plan is not conducive to what most people would consider to be intensive farming in the context of how it is applied in the Draft District Plan. The definition as it stands would include a single dairy cow in a paddock and a single deer or cattle beast on irrigated pasture which we do not believe is the intention of the rules to which intensively farmed stock applies in the Draft District Plan.</i></p> <p><i>Our understanding is that there are people at TDC that believe the definition is the same as what is included in NPS (either the National Planning Standard or the National Policy Statement for Fresh Water Management), the National Environmental Standards for Freshwater (NES), and Ecan’s Plan Change 7 (PC7). After an extensive search of these four documents we can only find this definition in use in the Canterbury Land and Water Regional Plan (LWRP). However, in our view it has been taken out of context and the application of it in the Draft District Plan is not appropriate. In the LWRP it is specifically used in policy and rules that relate to stock exclusion from waterways. It is not used in any other context in the LWRP and therefore it is entirely inappropriate for TDC to use the same definition when no aspects of the Draft District Plan relate to stock exclusions from waterways.</i></p> <p><i>The Selwyn District Council in their draft plan define intensive farming as a commercial activity which predominantly occurs indoors, or where the stock density or nature of the activity doesn’t maintain ground cover. Ashburton District Council refers to intensive farming in their District Plan as usually requiring extensive areas of buildings for the purpose of housing animals and for effluent disposal. The Waimate and Waitaki District Councils have similar definitions and specifically excludes dairying.</i></p>	

				<p><i>Outcome We Seek</i></p> <p><i>We ask that TDC change their definition of intensively farmed stock to ensure it does not include what is normal farming activity in the region, specifically dairy farming and farming deer and cattle on irrigated pasture. We seek a definition similar to those above used by other District Councils.</i></p>	
<a href="#">43.110</a>	GRUZ – General rural zone	Policies	GRUZ-P4 Factory farming, intensively farmed	<p><i>Retain as proposed or preserve the original intent.</i></p> <p><i>Support this as it is consistent with CRPS direction in terms of managing appropriate activities with regard to servicing and other factors.</i></p>	
<a href="#">119.5</a>	GRUZ – General rural zone	Policies	GRUZ-P4 Factory farming, intensively farmed	<p><i>The draft plan notes the provision for existing uses with Section 10 of the RMA. An existing lawfully established activity which does not comply with (for example) the new rules or standards could continue on the same basis under this provision. While this may provide some certainty for some activities, for example where there are existing structures within the specified setbacks, the existing use provisions for other activities may be less certain, and as such impose some risk.</i></p> <p><i>Farming activities can vary within and between years. A risk may be how this existing use may be interpreted or applied for any given parcel of land. We note that the onus would be on the person carrying out the activity to provide evidence to the Council demonstrating the activity is an activity as described in Section 10.</i></p>	
<a href="#">131.3</a>	GRUZ – General rural zone	Policies	GRUZ-P4 Factory farming, intensively farmed	<p><i>GRUZ-P4: We seek the re-definition of ‘Intensively farmed stock’. The present definition is too broad, and not comparable to other district council definitions (Selwyn, Ashburton, Waimate and Waitaki). We believe the definitions should be re-vised to exclude what we believe to be current normal farming activities within our region (dairying on irrigated pasture, and deer farming).</i></p>	<p>Revise definition of intensively farmed stock to exclude current normal farming activities within our region (dairying on irrigated pasture, and deer farming) OR remove the term from GRUZ-P4.</p>

<a href="#">132.3</a>	GRUZ – General rural zone	Policies	GRUZ-P4 Factory farming, intensively farmed	<p><i>Issue</i></p> <p><i>GRUZ-P4 refers to amongst other things, intensively farmed stock. The definition of intensively farmed stock as it is included in the draft plan is not conducive with what most people would consider to be intensive farming. The definition as it stands would include a single dairy cow in a paddock and a single deer or cattle beast on irrigated pasture. The Selwyn District Council in their draft plan define intensive farming as a commercial activity which predominantly occurs indoors, or where the stock density or nature of the activity doesn't maintain ground cover. Ashburton District Council refers to intensive farming in their District Plan as usually requiring extensive areas of buildings for the purpose of housing animals and land for effluent disposal. The Waimate and Waitaki District Council's have similar definitions and specifically excludes dairying.</i></p>	<p>Outcome We Seek</p> <p>We ask that TDC reconsider their definition of intensive farming to ensure it does not include what is normal farming activity in the region specifically dairy farming and farming deer and cattle on irrigated pasture. We seek a definition similar to those above used by other District Councils.</p>
<a href="#">28.2</a>	GRUZ – General rural zone	Policies	GRUZ-P5 Other activities	<p><i>We support this policy as it seeks to protect primary production activities from being compromised and constrained by the establishment of sensitive activities.</i></p> <p><i>However, this policy is permissive, rather than restrictive, and the policy enables these "other activities" to establish in the rural zone provided they can demonstrate that the activity satisfies clauses 1-7.</i></p> <p><i>As the DDP has stated that the land resource in the rural zone underpins the economic, social and cultural wellbeing of the District, Policy 5 should seek to restrict "other activities" in the rural zone unless they can meet the standards of clauses 1-7.</i></p>	



				<p><i>In addition, we note sub-part (6) - the activity does not constrain the establishment of activities otherwise anticipated within the General Rural Zone does not provide for activities that are already operating.</i></p> <p><i>Suggested wording of GRUZ-P5 is as follows:</i></p> <p><i>Avoid other activities, except where it can be demonstrated that:</i></p> <p>....</p> <p>6. <i>the activity does not constrain the operation and establishment of activities otherwise anticipated within the General Rural Zone.</i></p> <p>.....</p>	
<a href="#">96.43</a>	GRUZ – General rural zone	Policies	GRUZ-P5 Other activities Only allow o	<p>█ supports other activities being permitted in the General Rural Zone, where it can be demonstrated that various conditions or standards can be complied with. This includes having on site infrastructure to service the activity where reticulated services are not available. █ support this, however, wish to make it clearer that water supply for firefighting should be provided for.</p> <p>Additionally, █ also would support emergency services being an activity provided for in the General Rural Zone, as and when there is an operational or functional need for them to be located within the zone.</p> <p>Amend to include:</p>	

				<p><i>Only allow other activities, where it can be demonstrated that:</i></p> <ol style="list-style-type: none"> <li>1. <i>the activity is compatible with the purpose, character and qualities of the General rural zone; and</i></li> <li>2. <i>the site design, layout and scale of the activity is compatible with the character and qualities of the Zone; and</i></li> <li>3. <i>the activity will not adversely impact the safe and efficient operation of the road network, and there is suitable vehicle parking, loading, manoeuvring and access provided on-site; and</i></li> <li>4. <i>there is adequate infrastructure available to service the activity, including on-site servicing where reticulated services are not available; and</i></li> <li>5. <i>there is adequate water supply provided for firefighting purposes;</i></li> <li>6. <i>areas of indigenous vegetation are retained where practicable; and</i></li> <li>7. <i>the activity involves environmental benefits, such as planting and fencing of erosion-prone land, areas of indigenous vegetation, wetlands and riparian areas; and</i></li> <li>8. <i>the activity does not constrain the establishment of activities otherwise anticipated within the General Rural Zone; and</i></li> <li>9. <i>there are measures to internalise effects and avoid conflict and potential reverse sensitivity effects on activities anticipated in the Zone, including primary production and residential activity and</i></li> <li>10. <i>for emergency services, it can be demonstrated that there is a functional or operational need to be located within the Zone.</i></li> </ol>	
<a href="#">129.27</a>	GRUZ – General rural zone	Policies	GRUZ-P5 Other activities Only allow o	<p><i>Objective GRUZ-O5, and Policies GRUZ-P1, P5, and P6 – Objective GRUZ-O5 reads more as a policy than objective. By its nature, mining and quarrying should occur only within the rural zone, as the activity is compatible with rural-type land uses. It is also acknowledged, however, that the location of such activities within the zone should be appropriate; such sites typically need good separation from surrounding sensitive activities and are subject to the existence of an appropriate mineral resource. However, the very nature of these activities results in a temporary disruption to the qualities and amenity values of the immediate surrounds until remediation is complete; on this basis, these qualities are not “maintained” as sought. Moreover, on occasion, it may be appropriate to convert an extraction area to a water storage reservoir, wetland, pond or lake on completion, rather than return the land to</i></p>	Relief sought – Amend the bundle of GRUZ objectives, policies and rules in the manner described above. This includes providing for all quarries by amending the rules attached to farm quarries to allow that any quarry up to 2,000m2 may occur as a Permitted

				<p><i>its previous state. For these reasons, greater flexibility in the objective and policy regime is sought to recognise and provide for quarrying and mining in the GRUZ.</i></p> <p><i>A further matter of concern is the provision for private “farm quarries” (see, for example, policies GRUZ-P1 and GRUZ-P7, and rule GRUZ-R13). If the plan seeks to address environmental effects, there should be no distinction between “farm” and “general” quarries as it is the effects that should be addressed. Accordingly, the reference to “farm” quarries should be deleted and replaced with control allowing all small scale quarries more generally, whether or not the material extracted is used within the source property.</i></p> <p><i>As a final note, the wording of policies GRUZ-P5 and P6 are considered to be problematic. For example, P5 uses the term “...not adversely impact...”, whereas the RMA concerns itself with adverse environmental effects. This wording should be amended to reflect the proper concerns of the RMA. In relation to GRUZ-P5 and P6, these both begin with the very restrictive and narrow word “Only” in relation to other activities and mining and quarrying. Such an approach is considered to be too restrictive and unjustified. It also requires protection of some values, and avoidance or mitigation of effects on sensitive activities. While it is accepted that adverse environmental effects must be managed, this approach is considered to be too blunt and limiting, and does not provide for the full range of avoid, remedy and/or mitigation of effects, as contemplated by the RMA.</i></p>	<p>Activity. Delete the words “Only” from the beginning of policies GRUZ-P5 and P6. Amend the Objective regime to acknowledge that mining and quarrying is an appropriate land use within the GRUZ, provided that the effects of these activities are appropriately avoided, remedied or mitigated. Amend Rule GRUZ-R1 to include farming and existing authorised quarrying as a Permitted Activity.</p>
<a href="#">133.11</a>	GRUZ – General rural zone	Policies	GRUZ-P6 Mining and quarrying including farm	<p><i>This mentions 2000m2. This is obviously a typo, as 2000m2 without a third dimension equals 0m3</i></p>	<p>Change this to 2000m3</p>
<a href="#">43.113</a>	GRUZ – General rural zone	Policies	GRUZ-P6 Mining and quarrying including farm	<p><i>Retain as proposed or preserve the original intent.</i></p> <p><i>This policy gives effect to the CRPS by protecting sensitive areas and landscapes from the effects of quarrying and mining.</i></p>	
<a href="#">62.20</a>	GRUZ – Gener	Policies	GRUZ-P9 Inappropriate (or	<p><i>Support in part:</i></p> <p><i>Add new activities to avoid:</i></p>	

	al rural zone		incompatible) activities	<i>Avoid reverse sensitivity effects on lawfully established primary production activities</i>	
<a href="#">80.15</a>	GRUZ – General rural zone	Policies	GRUZ-P9 Inappropriate (or incompatible) acti		<p>█ seeks amendment as follows:</p> <p>d. may have reverse sensitivity effects on regionally significant infrastructure or lifelineutilities.</p>
<a href="#">118.49</a>	GRUZ – General rural zone	Policies	GRUZ-P9 Inappropriate (or incompatible) acti	<p>█ opposes Policy GRZ-P4 to the extent that the Policy requires the absolute avoidance activities in certain circumstances in the General Rural Zone. █ considers that regionally significant infrastructure, such as the National Grid, often has an operational need or functional need to locate in rural zone and should be provided as opposed to being possibly prevented by this Policy in a manner that does not give effect to the National Policy Statement on Electricity Transmission. █ seeks that Policy GRUZ-P9 is amended as follows:</p> <p>“Avoid activities (except for regionally significant infrastructure) that:</p> <ol style="list-style-type: none"> <li>1. are incompatible with the purpose, character and qualities of the General rural zone; or</li> <li>2. would result in a loss of productive capacity; or</li> <li>3. would require the extension of infrastructure that is uneconomic, inefficient and not provided for in the Council’s Long Term Plan.”</li> </ol>	
<a href="#">62.34</a>	GRUZ – Gener	Policies	GRUZ-PREC2-R8 Factory farming	<i>Support in full: Support intensive indoor primary production as a non-complying activity in the Geraldine future urban precinct.</i>	



				<i>We are also concerned at the over regulation of farming, from both regional and district council, and note that we are already required to produce a land use consent under Ecan rules. Another layer of rules seems cumbersome, and unnecessary in some situations, particularly where many landowners are struggling to understand continual new regulations, which creates additional workload, stress and financial cost to the landowner.</i>	
<a href="#">133.10</a>	GRUZ – General rural zone	Rules	GRUZ-R13 Farm quarries up to 2,000m <sup>2</sup>	<i>This mentions 2000m<sup>2</sup>. This is obviously a typo, as 2000m<sup>2</sup> without a third dimension equals 0m<sup>3</sup></i>	Change this to 2000m <sup>3</sup>
<a href="#">43.117</a>	GRUZ – General rural zone	Rules	GRUZ-R13 Farm quarries up to 2,000m <sup>2</sup>	<i>Retain as proposed or preserve the original intent.</i>  <i>This rule does not duplicate the LWRP because it addresses visual effects and effects on terrestrial biodiversity, which are not specifically managed by the LWRP earthworks or quarrying rules.</i>	
<a href="#">91.10</a>	GRUZ – General rural zone	Rules	GRUZ-R13 Farm quarries up to 2,000m <sup>2</sup>	1. <span style="background-color: black; color: black;">████</span> notes that the 20 metres setback proposed in PER-2 is not practical as farm quarrying is usually undertaken in non-effective areas (for example, corners of paddocks). <span style="background-color: black; color: black;">████</span> considers it is unnecessary and impracticable to impose setback rules for farm quarrying.	
<a href="#">129.2</a>	GRUZ – General rural zone	Rules	GRUZ-R13 Farm quarries up to 2,000m <sup>2</sup>	<i>The DDP includes rules which effectively duplicate controls under Canterbury Regional Plans and, in particular, rules contained in the Land and Water Regional Plan (LWRP). Examples include LWRP rules addressing earthworks and vegetation clearance in riparian areas (5.167 – 5.169), vegetation in lake and river beds (5.163 – 5.166), wetlands (5.159 – 5.162), and gravel takes from lake and river beds (5.147 – 5.153). Similar controls exist in the DDP. For example,</i>	<b>The relief sought</b> is that all rules are reviewed and amended to remove the duplication of controls where this is

				<p><i>rule NH-R1. This will require additional resource consent for gravel extraction from riverbeds and for repair or maintenance of regionally significant infrastructure (e.g. roads and bridges) that cannot achieve compliance with PER-1. Rule RDIS-1 will also require additional resource consent within specified areas, irrespective of the need to obtain regional council consent(s) in many circumstances.</i></p>	<p>already subject to regional rules. It is also requested that the council works more closely with the regional council to exploit opportunities to transfer functions where there is scope to streamline regulatory controls.</p> <p>Similarly, matters of discretion in rules such as EW-S1 include matters that fall within the control of regional council functions (e.g. dust, sediment, erosion). Again, this duplication of control simply adds a further layer of regulation, and associated costs, delays and uncertainty, without any corresponding benefit or reduction in environmental risk.</p> <p><b>The relief sought</b> is that the rules are reviewed and amended to remove matters of control that more properly fall within the function of</p>
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					<p>the Canterbury Regional Council, unless specifically directed to manage these aspects by the Regional Policy Statement.</p> <p>The DDP places reliance on a commitment to adhere to an Accidental Discovery Protocol (ADP) within the rules regime (see, for example, rule SASM-R1, Per-3). It is suggested that this approach could be streamlined by including the ADP as a stand-alone rule that requires compliance for all/any activities to be Permitted. This method would be consistent with the purpose and principles of the Heritage New Zealand Pouhere Taonga Act 2014.</p> <p><b>The relief sought</b> is that the requirement for compliance with an ADP is incorporated into the DDP as a stand-alone Permitted Activity Rule. This should</p>
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					include the ADP <i>in toto</i> as the Permitted Activity threshold.
<a href="#">62.26</a>	GRUZ – General rural zone	Rules	GRUZ-R17 Rural tourism activity	<b>Oppose:</b>  <i>Oppose the lack of clarity on the scale and activity status for an activity likely to be sensitive to and conflict with some rural activities.</i>	
<a href="#">28.14</a>	GRUZ – General rural zone	Rules	GRUZ-R18 Factory farming	<p><i>The definition Factory farming should be removed, as recommended above.</i></p> <p><i>Providing for intensive primary production in the rural zone is critical as these activities have no other zone to locate to.</i></p> <p><i>We recommend GRUZ-R18 is amended as a permitted activity, with suggested wording as follows:</i></p> <p><i>Activity status: PER</i></p> <ol style="list-style-type: none"> <li><i>1. The establishment of a new, or expansion of an existing intensive primary production activity.</i></li> </ol> <p><i>Where:</i></p> <ol style="list-style-type: none"> <li><i>1. the activity does not involve the production of mushrooms.</i></li> </ol>	

				<p><i>And this activity complies with the following rule requirements:</i></p> <p><i>GRUZ-S4 Intensively farmed stock and stock building setbacks from boundaries</i></p>	
<a href="#">62.27</a>	GRUZ – General rural zone	Rules	GRUZ-R18 Factory farming	<p><b><i>Oppose:</i></b></p> <p><i>Oppose factory farming as a discretionary activity. Change definition used in rule to Intensive Primary Production, to cover both intensive indoor and intensive outdoor operations.</i></p> <p><i>Propose a permitted activity status subject to standards to address potential reverse sensitivity issues to existing sensitive activities.</i></p> <ol style="list-style-type: none"> <li><i>1. Providing detailed plan to council, showing the location of all paddocks, hard-stand areas, structures or buildings used to house stock, and wastewater treatment systems associated with the intensive primary production.</i></li> <li><i>2. All paddocks, hard-stand areas, structures, buildings used to house stock, and wastewater treatment systems associated with intensive primary production, shall be located a minimum distance of 300m from the notional boundary of any lawfully established existing sensitive activity on another site, and 1km from any residential zone.</i></li> </ol> <p><i>Support a discretionary activity status when compliance not achieved.</i></p>	
<a href="#">45.3</a>	GRUZ – General rural zone	Rules	GRUZ-R20 New farm quarry greater than 2000m2	<p><b><i>Setback Distances</i></b></p> <p><i>We support the setback distances as set out in GRUZ R16 and GRUZ R20. However, for the record, we would like to state our preference for an alternative approach which we are promoting at the national level.</i></p> <p><i>Rather than specifying prescribed distances, we believe district plans should allow setback distances to be determined on a case-by-case basis.</i></p> <p><i>There are a number of factors that need to be considered to ensure the benefit and comfort of neighbouring activities and residents as well as the interests of the quarries and its</i></p>	

				<p>customers. If the environmental effects of quarrying such as noise, dust and vibration etc can be addressed by other parts of the District Plan, then it begs the question as to whether prescriptive setback distances are necessary. Aligning any setbacks with appropriate standards such as noise limits is preferable to prescribed distances.</p>	
<a href="#">62.28</a>	GRUZ – General rural zone	Rules	GRUZ-R21 Health care and community facilities	<p><b>Oppose:</b> Oppose the lack of clarity on the scale and activity status for an activity likely to be sensitive to and conflict with some rural activities.</p>	
<a href="#">96.44</a>	GRUZ – General rural zone	Rules	GRUZ-R21 Health care and community facilities	<p><i>Oppose</i></p> <p>██████ opposes this rule as there is no provision established for ████████ and other emergency facilities which often have a functional or operational need to be located in ████████ or emergency service facilities should be Controlled or Restricted Discretionary.</p> <p><b>Insert new rule as follows:</b></p> <p>GRUZ-RXX should be provided to include ‘Emergency Service Facilities’ as a Controlled activity, with matters of control:</p> <p>Where the relevant standards are complied with including GRUZ-S1 - Height</p> <p>GRUZ-S2 – Setbacks from residential</p> <p>GRUZ-S3 – setbacks from boundaries</p>	
<a href="#">62.25</a>	GRUZ – General rural zone	Rules	GRUZ-R15 Outdoor farming of pigs	<p><b>Oppose:</b></p> <p>Oppose controlled activity status for the outdoor farming of pigs, provided no more than 20 sows and their progeny.</p> <p>Oppose discretionary activity status if more than 20 sows and their progeny.</p>	

				<p><i>Extensive pig farming, in which groundcover is maintained, is a low intensity activity with no more impact than other pastoral based farming activities and should be subject to the rules and standards applicable to farming.</i></p> <p><i>Delete rule.</i></p>			
<a href="#">48.6</a>	GRUZ – General rural zone	Rules	GRUZ-R1 Farming General rural zone	<p>██████████ are uncomfortable with the Draft District Plan especially - Flood overlay NH- Ri. Then SASM/5 and SASM/23 re significance to Maori. EW-R1, the SNA's and GRUZ-1 all make our operation restrictive and lack commonsense.</p>			
<a href="#">99.2</a>	GRUZ – General rural zone	Rules	GRUZ-R1 Farming General rural zone	<p>██████████ <b>position is:</b></p> <p><i>Support in part</i></p> <p><b>Comments relating to feedback</b></p> <p>██████████ supports permitted activity status for farming in the GRUZ, subject to ██████████ feedback in relation to the definition of farming and GRUZ-S3 and GRUZ-S4.</p> <p><b>Feedback on the provisions</b></p> <p><i>Retain GRUZ-R1 as drafted, subject to ██████████ feedback regarding the definition of farming and GRUZ-S3 and GRUZ-S4 below.</i></p>			
<a href="#">62.21</a>	GRUZ – General rural zone	Rules	GRUZ-R1 Farming	<p><b>Support in full:</b> Support permitted activity status for farming. Retain as proposed.</p>			
<a href="#">87.22</a>	GRUZ – Gener	Rules	GRUZ-R11 Airstrips used for private purposes	<table border="1"> <tr> <td>Oppose</td> <td>Topdressing activities from such GRUZ located airstrips, such as that undertaken by Aerowork, cannot comply with the landing restrictions contained in Condition PER-1 of this rule (i.e., restricted to no more than 8 landings per day and 28 per</td> </tr> </table>	Oppose	Topdressing activities from such GRUZ located airstrips, such as that undertaken by Aerowork, cannot comply with the landing restrictions contained in Condition PER-1 of this rule (i.e., restricted to no more than 8 landings per day and 28 per	
Oppose	Topdressing activities from such GRUZ located airstrips, such as that undertaken by Aerowork, cannot comply with the landing restrictions contained in Condition PER-1 of this rule (i.e., restricted to no more than 8 landings per day and 28 per						

	al rural zone			<p>week). Generally, topdressing activities would entail up to 12 take-off/landings per hour for six to seven hours a day. However, the use of an airstrip for topdressing activities will only occur two to three times a year.</p> <p>Requiring a resource consent for topdressing activities, which is inherently linked to the rural environment, is considered unnecessary.</p>	<p>Amend the note attached to this rule as follows:</p> <p><i>Note:</i></p> <p><i>The requirements of this rule do not apply to any aircraft movements associated with aerial topdressing activities or required for emergency purposes such as medical emergencies, search and rescue, or firefighting.</i></p>
<a href="#">99.4</a>	GRUZ – General rural zone	Rules	GRUZ-R12 Shelterbelts General rural z	<p>█████ <b>position is:</b></p> <p><i>Support in part</i></p> <p><b>Comments relating to feedback</b></p> <p><i>Shelterbelts are a common feature in the GRUZ. █████ considers that the permitted activity status thresholds in GRUZ-R12 are appropriate to manage the effects associated with such activities.</i></p> <p><b>Feedback on the provisions</b></p>	

				<i>Retain GRUZ-R12 as drafted.</i>	
<a href="#">40.1</a>	GRUZ – General rural zone	Rules	GRUZ-R2 Residential units	<i>This is way too large for a minimum site size. It would be too small to earn an income from yet too large for most people to maintain. The minimum size needs to be reduced. Farms may require blocks to be more easily subdivided off for selling-not just to lifestyle people but also to other famers.</i>	Reduce minimum allotment size
<a href="#">62.22</a>	GRUZ – General rural zone	Rules	GRUZ-R2 Residential units	<p><b>Support in part:</b></p> <p><i>Oppose no standards to address reverse sensitivity to existing primary production activities.</i></p> <p><i>Support restricted discretionary status for residential units on an undersized lot.</i></p> <p><i>Add standard for minimum setback distances from established intensive primary production activities as follows:</i></p> <p><i>The sensitive activity shall be setback 300m from the closest outer edge of any paddocks, hard-stand areas, structures, or buildings used to hold or house stock, and wastewater treatment systems used for intensive primary production. The establishment of residential units, or minor residential units on the same site as the intensive primary production are exempt from this rule requirement.</i></p>	
<a href="#">68.32</a>	GRUZ – General rural zone	Rules	GRUZ-R2 Residential units General rur	<i>The 40 ha minimum area is an arbitrary figure unrelated to the economic use.</i>	
<a href="#">91.9</a>	GRUZ – General rural zone	Rules	GRUZ-R2 Residential units General rur	<ol style="list-style-type: none"> <li>1. <i>While █████ supports the intent of this rule in that it seeks to maintain the character and qualities of the GRUZ, the rule does not accommodate typical dairy farm accommodation. █████ █████ property is approximately 150 hectares and has three residential units (which are each used by farm workers and their direct family).</i></li> </ol>	

				<p>2. ■■■ considers that residential units for farm workers (and their direct family) should be excluded from the restrictions proposed in this rule.</p>	
<a href="#">99.3</a>	GRUZ – General rural zone	Rules	GRUZ-R2 Residential units General rur	<p>■■■ <b>position is:</b></p> <p><i>Support in part</i></p> <p><b>Comments relating to feedback</b></p> <p>■■■ supports permitted activity status for new residential units within the GRUZ, subject to ■■■ feedback regarding GRUZ-S3.</p> <p><b>Feedback on the provisions</b></p> <p><i>Retain GRUZ-R2 as drafted, subject to ■■■ feedback regarding GRUZ-S3.</i></p>	

<a href="#">62.23</a>	GRUZ – General rural zone	Rules	GRUZ-R4 Educational facilities	<p><b>Oppose:</b></p> <p><i>Oppose PA status for educational facilities, which is a sensitive activity in the rural environment.</i></p> <p><i>Change activity status to restricted discretionary.</i></p> <p><i>Add to matters of discretion:</i></p>	
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				<i>The potential reverse sensitivity effects with activities on surrounding sites</i>	
<a href="#">68.33</a>	GRUZ – General rural zone	Rules	GRUZ-R4 Educational facilities General	<i>This rule needs modification to better allow for rural schools.</i>	
<a href="#">62.24</a>	GRUZ – General rural zone	Rules	GRUZ-R5 Visitor accommodation	<p><b>Oppose:</b></p> <p><i>Oppose PA status for visitor accommodation which is a sensitive activity in the rural environment.</i></p> <p><i>Change activity status to restricted discretionary.</i></p> <p><i>Add to matters of discretion:</i></p> <p><i>The potential reverse sensitivity effects with activities on surrounding sites</i></p>	
<a href="#">133.5</a>	GRUZ – General rural zone	Rules	GRUZ-R8 Rural produce retail General	<p><b>Set back from road boundary</b></p> <p><i>Our business is [REDACTED]</i></p> <p><i>PER-1 states that any retail area should be 25m off the road boundary, [REDACTED]</i></p> <p><b>Gross floor area of retail space</b></p> <p><i>75m2 is too restrictive to allow adequate displays</i></p>	That set back from the road boundary be 20m from road boundary that the site is accessed from. That the maximum retail space be 100m2
<a href="#">133.6</a>	GRUZ – General rural zone	Rules	GRUZ-R9 Rural produce manufacturing G	<i>As per PER-1 the maximum gross floor area is permitted to be 100m2. This small maximum area is very problematic, especially as in the definitions even if only a small portion of a building is used for this activity (even if that small portion is separated by internal walls) the measurement is for the whole building. I'm not sure why there needs to be any maximum floor area. With the cost of building no-one wants to build a building larger than what is required to</i>	That “manufacturing”, “processing of material” be more defined. That if the above definitions include



				<p>carry out the work required. There is no precise definition of what “manufacturing” or “processing of material” means but if this includes packing/grading sheds and drying facilities then 100m2 is very restrictive. With modern grading and packing sheds for horticultural products it is important that these are built large enough to accommodate optical graders and automatic packers (as is the case in the large fruit and vegetable growing areas of Pukekohe, Bay of Plenty, Nelson and Central Otago). To build such large facilities should be a permitted activity in the Timaru District.</p>	<p>grading/packing/drying then there be no size limit for such buildings. If it doesn’t include these activities then the definition of the “gross floor area” is amended to not include areas not used for manufacturing or processing and that the minimum floor area is increased to 500m2.</p>
<a href="#">45.2</a>	GRUZ – General rural zone	Rules	GRUZ-R16 Expansion of existing consented qua	<p><b>Setback Distances</b></p> <p><i>We support the setback distances as set out in GRUZ R16 and GRUZ R20. However, for the record, we would like to state our preference for an alternative approach which we are promoting at the national level.</i></p> <p><i>Rather than specifying prescribed distances, we believe district plans should allow setback distances to be determined on a case-by-case basis.</i></p> <p><i>There are a number of factors that need to be considered to ensure the benefit and comfort of neighbouring activities and residents as well as the interests of the quarries and its customers. If the environmental effects of quarrying such as noise, dust and vibration etc can be addressed by other parts of the District Plan, then it begs the question as to whether prescriptive setback distances are necessary. Aligning any setbacks with appropriate standards such as noise limits is preferable to prescribed distances.</i></p>	
<a href="#">43.116</a>	GRUZ – General rural zone	Rules	GRUZ-R16 Expansion of existing consented qua	<p><i>Amend as follows:</i></p>	

				<p><b>Activity status: Restricted Discretionary</b></p> <p><b>Where:</b></p> <p><b>RDIS-1</b></p> <p>The expansion of the existing quarry does not increase:</p> <p><b>General rural zone</b></p> <ul style="list-style-type: none"> <li>a. the rate of production beyond existing consented levels, and</li> <li>b. the hours of operation; and</li> </ul> <p><b>RDIS-2</b></p> <p>The expansion does not occur within:</p> <ul style="list-style-type: none"> <li>a. 500m of a sensitive activity, Residential zone, Settlement zone or Maori Purpose zone; or</li> <li>b. 20m of a site boundary; or</li> <li>c. 100m of a riparian margin; or</li> <li>d. <u>the mapped drinking water protection overlay; or</u></li> <li>e. an outstanding natural landscape or feature, significant natural area, high naturalness water body, visual amenity landscape, the coastal environment,</li> </ul>	<p><b>Activity status where compliance not achieved with RDIS-1: Discretionary</b></p> <p><b>Activity status where compliance not achieved with RDIS-2: Non-complying</b></p>	
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				<p>a site or area of significance to Maori and a heritage item or setting.</p> <p><b>Matters of discretion are restricted to:</b></p> <ol style="list-style-type: none"> <li>1. adverse effects on the visual amenity and landscape character and the location and scale of any buildings; and</li> <li>2. the extent of dust nuisance, land instability, and contamination; and</li> <li>3. adverse effects on the margins of water bodies; and</li> <li>4. rehabilitation of the site.</li> <li>5. the provision of an accidental discovery protocol.</li> </ol>	
<a href="#">129.4</a>	GRUZ – General rural zone	Rules	GRUZ-R16 Expansion of existing consented qua	<p><i>The DDP places reliance on a commitment to adhere to an Accidental Discovery Protocol (ADP) within the rules regime (see, for example, rule SASM-R1, Per-3). It is suggested that this approach could be streamlined by including the ADP as a stand-alone rule that requires compliance for all/any activities to be Permitted. This method would be consistent with the purpose and principles of the Heritage New Zealand Pouhere Taonga Act 2014.</i></p>	<p><b>The relief sought</b> is that the requirement for compliance with an ADP is incorporated into the DDP as a stand-alone Permitted Activity Rule. This should include the ADP <i>in toto</i> as the Permitted Activity threshold.</p>
<a href="#">38.4</a>	GRUZ – Gener	Standards	GRUZ-S2 Setbacks from residential units	<b>Issue</b>	

	al rural zone			<p><i>GRUZ-S2 refers to storage ponds which is not defined and therefore potentially could include irrigation and water storage ponds.</i></p> <p><b>Outcome We Seek</b></p> <p><i>We ask that either a definition of storage ponds is included or the standard is changed to specifically exclude irrigation and water storage ponds from this standard.</i></p>			
<a href="#">87.23</a>	GRUZ – General rural zone	Standards	GRUZ-S2 Setbacks from residential units	<table border="1"> <tr> <td>Oppose</td> <td> <p>██████████ consider that it is appropriate to increase the building setback to 100m to ensure that sensitive activities within the General Rural Zone are not impacted by activities being carried out on adjoining properties (including farming activities that are provided for in this zone).</p> <p>Specifically, given the ‘industrial’ nature of activities carried out the Seadown Store, an increased building setback from boundaries will ensure that reverse sensitivity effects from neighbouring properties are minimised.</p> </td> </tr> </table>	Oppose	<p>██████████ consider that it is appropriate to increase the building setback to 100m to ensure that sensitive activities within the General Rural Zone are not impacted by activities being carried out on adjoining properties (including farming activities that are provided for in this zone).</p> <p>Specifically, given the ‘industrial’ nature of activities carried out the Seadown Store, an increased building setback from boundaries will ensure that reverse sensitivity effects from neighbouring properties are minimised.</p>	<p>Amend the standard as follows:</p> <p><i>Buildings, other than milking sheds and buildings used to house or feed milking stock, must be set back a minimum of <del>30</del>100m from road and internal boundaries.</i></p>
Oppose	<p>██████████ consider that it is appropriate to increase the building setback to 100m to ensure that sensitive activities within the General Rural Zone are not impacted by activities being carried out on adjoining properties (including farming activities that are provided for in this zone).</p> <p>Specifically, given the ‘industrial’ nature of activities carried out the Seadown Store, an increased building setback from boundaries will ensure that reverse sensitivity effects from neighbouring properties are minimised.</p>						
<a href="#">131.4</a>	GRUZ – General rural zone	Standards	GRUZ-S2 Setbacks from residential units	<p><i>GRUZ-S2: Storage ponds are not defined in this provision and could potentially include irrigation and water storage ponds, therefore we seek re-definition to <b>exclude</b> irrigation and water storage facilities from this standard.</i></p>	<p><b>exclude</b> irrigation and water storage facilities from this standard.</p>		
<a href="#">132.4</a>	GRUZ – General rural zone	Standards	GRUZ-S2 Setbacks from residential units	<p><b>Issue</b></p> <p><i>GRUZ-S2 refers to storage ponds which is not defined and therefore potentially could include irrigation and water storage ponds.</i></p>	<p><b>Outcome We Seek</b></p> <p>We ask that a either a definition of storage ponds is included or the standard is changed to specifically exclude irrigation and water</p>		

					storage ponds from this standard.
<a href="#">66.8</a>	GRUZ – General rural zone	Standards	GRUZ-S2 Setbacks from residential units	<p><i>There may be existing farm infrastructure and facilities within the setbacks specified. These may be protected by the Section 10 provisions.</i></p> <p><i>Existing farm infrastructure and facilities may become non-compliant if a new house was built on an adjoining property within the specified setback. Rule GRUZ-R2 could be revised to control new residential units being constructed on adjoining properties within the setbacks specified.</i></p> <p><i>Adjoining property, and internal boundaries also need to be clarified to as meaning property not owned by the same person (or entity).</i></p> <p><i>It is also suggested that water storage ponds are excluded from the setbacks.</i></p>	
<a href="#">62.30</a>	GRUZ – General rural zone	Standards	GRUZ-S2 Setbacks from residential units	<p><b>Oppose in part:</b></p> <p><i>Controls on effluent storage and treatment facilities are a duplication of odour controls in the Canterbury Regional Air Plan (Rule 7.73), increasing planning and regulatory costs for farmers.</i></p> <p><i>Issues relating specifically to air quality, rather than general amenity, are more appropriately addressed through the Canterbury Regional Air Plan.</i></p> <p><i>Oppose large setbacks to road and internal boundaries where no sensitive activities have been identified.</i></p> <p><i>Amend standard as follows:</i></p> <p><i>Effluent holding tanks, treatment ponds, storage ponds, Silage pits and carcass disposal areas must be set back a minimum of:</i></p> <ol style="list-style-type: none"> <li><i>1. 300m from a residential unit on an adjoining property; and</i></li> <li><i>2. 100m 30m from a road boundary or an internal boundary or</i></li> </ol>	

				<p>3. 100m from a boundary of land zoned General residential zone, Settlement zone or Maori purpose zone.</p>	
<a href="#">91.11</a>	GRUZ – General rural zone	Standards	GRUZ-S2 Setbacks from residential units	<p>1. [REDACTED] notes that the LWRP provides setback rules from the boundary for an offal hole (100 metres), effluent storage (50 metres), and silage (50 metres). The District Plan should either not duplicate what is already required, or at the very least be consistent with the LWRP.</p> <p>2. Additionally, the Draft Plan should clarify that ‘storage ponds’ refers to effluent ponds and not irrigation storage ponds.</p>	
<a href="#">99.5</a>	GRUZ – General rural zone	Standards	GRUZ-S2 Setbacks from residential units	<p><b>[REDACTED] position is:</b></p> <p><i>Oppose in part</i></p> <p><b>Comments relating to feedback</b></p> <p><i>While GRUZ-S2 appears to be aimed at controlling adverse effects associated with effluent and carcass disposal activities, [REDACTED] is concerned that GRUZ-S2 as drafted could be taken to apply more broadly. In particular, [REDACTED] is concerned that the words “storage ponds” could be taken to include water and irrigation ponds, in addition to effluent storage ponds.</i></p> <p><b>Feedback on the provisions</b></p> <p><i>Amend GRUZ-S2 to the effect of:</i></p> <p><b>GRUZ-S2</b></p> <p><i>Effluent holding tanks, effluent treatment ponds, effluent storage ponds, silage pits and carcass disposal areas must be setback a minimum of</i></p> <ol style="list-style-type: none"> <li>1. 300m from a residential unit on an adjoining property; and</li> <li>2. 100m from a road boundary, an internal boundary or boundary of land zoned General residential zone, Settlement zone or Maori purpose zone.</li> </ol>	

<a href="#">62.31</a>	GRUZ – Gener al rural zone	Standards	GRUZ-S3 Setbacks from boundaries	<p><b>Support in part:</b></p> <p><i>Support 30m setback from road and internal boundaries.</i></p> <p><i>Add setback for new buildings from existing intensive primary production activities to address potential reverse sensitivity issues.</i></p> <p><i>Amend standard as follows:</i></p> <p><i>Buildings, other than milking sheds and buildings used to house or feed milking stock, must be set back a minimum of</i></p> <ol style="list-style-type: none"> <li><i>1. 30m from road and internal boundaries.</i></li> <li><i>2. 300m from the closest outer edge of any paddocks, hard-stand areas, structures, or buildings used to hold or house stock, and wastewater treatment systems used for intensive primary production.</i></li> </ol>	
<a href="#">86.28</a>	GRUZ – Gener al rural zone	Standards	GRUZ-S3 Setbacks from boundaries Gene	<p>██████ considers that it is appropriate to increase the building setback in the General Rural Zone to 50m to ensure that sensitive activities are not impacted by activities being carried out on adjoining properties.</p> <p><i>Specifically, ██████ holds regional resource consents to irrigate process wastewater to land on (██████ owned) farms near the ██████ manufacturing site. This irrigation activity has the potential to give rise to perceived amenity effects at times and an increased building setback from boundaries will ensure that effects on neighbouring properties are acceptable.</i></p> <p>██████ would be happy if the 50m setback only applied to sensitive activities (and all other buildings (other than milking sheds and buildings used to house or feed milking stock) are setback 30m).</p>	<p>Amend GRUZ-S3 as follows:</p> <p>Buildings, other than milking sheds and buildings used to house or feed milking stock, must be set back a minimum of <b>3050m</b> from road and internal boundaries.</p>
<a href="#">91.12</a>	GRUZ – Gener	Standards	GRUZ-S3 Setbacks from	<ol style="list-style-type: none"> <li><i>1. The operative plan requires buildings to be setback 30 metres from a wetland and 20 metres from a waterway – with no setback requirement from a road boundary. ██████ suggests that the operative requirements are appropriate. It is not practical for all</i></li> </ol>	

	al rural zone		boundaries Gene	<i>buildings to be setback 30 metres from a road and internal boundary; it is logical to build in the corner of a paddock rather than in the middle.</i>	
<a href="#">91.13</a>	GRUZ – General rural zone	Standards	GRUZ-S3 Setbacks from boundaries Gene	1. <b>█</b> considers the proposed setback rule in GRUZ-S4 to be entirely impractical, but understands that the Council has admitted this an error and therefore expects that it will be removed.	
<a href="#">95.2</a>	GRUZ – General rural zone	Standards	GRUZ-S3 Setbacks from boundaries Gene	<i>We were very concerned to see the proposals within the Draft Plan relating to the increase in the size of setbacks in rural areas which in many cases have the potential to impact significantly on farming operation viability if implemented as had been detailed. It has been comforting to see the response from TDC to the concerns on this matter voiced by the rural community in recent weeks. We do however wonder first at the process and appropriateness of this proposal being in the Draft Plan. As importantly we are also interested in the extent of engagement and consultation to date with our rural community on such an important matter. We would respectfully suggest this matter specifically is better positioned with the rural community via extensive consultation before any, even initial, positions are formulated.</i>	
<a href="#">99.6</a>	GRUZ – General rural zone	Standards	GRUZ-S3 Setbacks from boundaries Gene	<p><b>█ position is:</b></p> <p><i>Oppose in part</i></p> <p><b>Comments relating to feedback</b></p> <p><b>█</b> disagrees that buildings, other than milking sheds and buildings used to house or feed milking stock, should be setback a minimum of 30m from road and internal boundaries. The GRUZ is already developed with pastoral farming and residential and other buildings are not uncommon when supporting those activities. Buildings relating to those activities are not unexpected in that area, and need not be subject to a 30m setback restriction. <b>█</b> considers 10m would be sufficient to manage effects to a level expected and accepted in the GURZ.</p> <p><b>Feedback on the provisions</b></p>	



				<p><i>Amend GRUZ-S3 (and make consequential amendments to related rules/standards) to the effect of:</i></p> <p><i>GRUZ-S3</i></p> <p><i>Buildings, other than milking sheds and buildings used to house or feed milking stock, must be set back a minimum of 3010m from road and internal boundaries.</i></p> <p><i>Consequential amendments to GRUZ-P2 to reflect the changes requested to GRUZ-S3.</i></p>	
<a href="#">102.3</a>	GRUZ – General rural zone	Standards	GRUZ-S3 Setbacks from boundaries Gene	<p><i>For example the directive of GRUZ-P2 to manage the scale and location of built form so as to internalise effects and the setbacks proposed in Standards GRUZ-S3 and S4 are excessive and do not promote the efficient use of the land and therefore contrary to the intent to recognise and protect productive soils. Decisions on the location of buildings and activities on a farm are strategic and relate to the form of the property, function and farm system. By placing such extensive setbacks, the dDP is removing the landowner’s ability to farm efficiently and effectively, will compromise the viability of some smaller blocks and will result in the effective loss of productively significant areas of land (with likely loss in land value as a result).</i></p>	
<a href="#">133.8</a>	GRUZ – General rural zone	Standards	GRUZ-S3 Setbacks from boundaries Gene	<p><i>The setback of 30m of buildings in the General Rural Zone GRUZ-S3 is very restrictive. These setbacks are counter to the idea of minimizing the loss of productive land as effectively 30m of space between the boundary and the building will be waste land.</i></p> <p><i>The physical characteristics of some land parcels, eg contour/shape/drainage patterns/irrigation structures will make it difficult if not impossible to develop such buildings.</i></p>	To change the 30m setback of buildings provision on GRUZ-S3 to 5m.
<a href="#">134.3</a>	GRUZ – General rural zone	Standards	GRUZ-S3 Setbacks from boundaries Gene	<p><i>The Setback of buildings under RLZ-S4 is too restrictive at 15m from the boundaries. Likewise the setback of 30m of buildings in the General Rural Zone GRUZ-S3 is very restrictive. These setbacks are counter to the idea of minimizing the loss of productive land as effectively the 15m or 30m of space between the boundary and the building will be waste land. If these large setbacks are required, then rural lifestyle lots will need to be larger to accommodate this setback provisions, also meaning the loss of productive land. The physical characteristics of</i></p>	

				<p><i>some land parcels, eg contour/shape/drainage patterns/irrigation structures will make it difficult if not impossible to build either residences or farm buildings on.</i></p>	
<a href="#">28.7</a>	GRUZ – General rural zone	Standards	GRUZ-S4 Intensively farmed stock and stock building setbacks from boundaries	<p>Providing for intensive primary production in the rural zone is essential to avoid primary production activities being compromised, constrained, or curtailed by the more recent establishment of sensitive activities.</p> <p>Managing reverse sensitivity effects is important for intensive primary production activities because they are associated with potential noise and odour effects. This is the very reason why the effective operation of poultry farms is reliant on being located in a rural environment.</p> <p>We recommend GRUZ-S4 is rephrased:</p> <p><b><u>GRUZ-S4 Intensive Primary Production Setback</u></b></p> <p><u>All paddocks, hard-stand areas, structures, buildings used to house stock, and wastewater treatment systems associated with intensive primary production,</u></p>	

				<p><u>shall be located a minimum distance of 300m from the notional boundary of any lawfully established existing sensitive activity on another site.</u></p>	
<a href="#">46.1</a>	GRUZ – General rural zone	Standards	GRUZ-S4 Intensively farmed stock and stock building setbacks from boundaries	<p>██████████ wishes to provide feedback on GRUZ-S4 Intensively farmed stock and stock building setbacks from boundaries.</p> <p>The definition of Intensively Farmed Stock includes dairy cattle, including cows, whether dry or milking, and whether on irrigated land or not. GRUZ-S4 will require stock, stock holding areas, milking sheds and buildings used to house or feed stock to be set back a minimum of 100m from all boundaries and 400m from residential units on an adjoining site.</p> <p>██████████ considers that the proposed rule is onerous and is concerned that this rule has been developed without appropriate consultation with farmers; and reflects a lack of understanding of the operation of farms.</p> <p>██████████ queries the information on which this proposed rule has been based including technical assessments and case studies which demonstrate that dairy cattle grazing up to boundary fences creates significant adverse effects on adjoining land owners. It is especially unclear why grazing dairy cows would need to be setback 100m from an adjoining property which is also used for primary production. It is unclear how Council will implement the rule having regard to existing use rights where stock have grazed up to boundaries for many decades.</p> <p>The proposed 100m setback will create significant corridors of unusable land on dairy farms, adversely affecting the economic viability of farms. ██████████ queries if the Council has undertaken an analysis of how much of its district the proposed rule would remove from economic farm production along with an economic analysis of the effect of the rule. Any such economic analysis should be informed by engagement with appropriate dairy and farm advisors.</p> <p>██████████ is also concerned that the proposed rule duplicates matters that are the responsibility of Environment Canterbury increasing costs and time delays for farm management.</p> <p>██████████ requests that the proposed rule GRUZ-S4 is deleted from the draft District Plan and should not be included in the Proposed District Plan when notified.</p>	

66.9	GRUZ – General rural zone	Standards	GRUZ-S4 Intensively farmed stock and stock building setbacks from boundaries	<p><i>As currently written, this rule restricts cattle within the setbacks specified, and a resource consent would be required for cattle within the setbacks. We understand this was not intended. It is suggested that setback is revised to allow existing practice (ie no setback for cattle from boundaries).</i></p>	
38.5	GRUZ – General rural zone	Standards	GRUZ-S4 Intensively farmed stock and stock b	<p><b>Issue</b></p> <p><i>GRUZ-S4 refers to setbacks for intensively farmed stock and stock buildings. This has major impacts on the ability of land owners to make decisions about future options for farming their land.</i></p> <p><i>Outcome We Seek</i></p> <p><i>We understand that TDC have admitted that this standard is a mistake. We ask that prior to presenting the Final Draft Plan to Councillors you publish the proposed amendments to this standard and pro-actively seek feedback from various farming industry groups and people who provided feedback on this standard.</i></p>	
102.4	GRUZ – General rural zone	Standards	GRUZ-S4 Intensively farmed stock and stock b	<p><i>██████████ are particularly concerned by GRUZ-S4, as one of the many standards farming activities must meet in order to meet the permitted activity status for farming. The effects we understand are supposed to be managed by this provision – noise, odour, dust, visual amenity – would be effects normally expected (and recognised by this dDP) in the rural zone, but the provision would apply regardless of the use or activity on the adjoining property.</i></p> <p><i>The requirement for excessive setbacks from any property boundary or road will lead to perverse outcomes, partly through loss of productive land for productive use regardless of the actual sensitivity of the receiving environment, and partly due to the definition of Intensively Farmed Stock.</i></p> <p><i>The Intensively Farmed Stock definition includes cattle or deer grazed on irrigated land or contained for the break feeding of winter crops. We do not support this definition.</i></p> <p><i>Livestock can be farmed under irrigation and grazed on winter crops without it meeting an ordinary industry standard of being intensive. Intensiveness relates to stocking rate (typically</i></p>	

				<p>at levels that require more imported feed over and above what the land can produce). Regulating activities as intensively farmed without reference to stocking rate can result in activities which are not intensive being captured by this provision, which is a perverse outcome.</p> <p>Further, ██████████ note that there are a number of pastoral properties in Timaru District which use irrigation infrastructure that cannot be moved. This infrastructure is expensive, their use is already consented through Environment Canterbury, and in the case of centre pivots they allow the farmers to irrigate more efficiently with lower nutrient losses than many other irrigation methods. The GRUZ – S4 setbacks would require further resource consent or inhibit farmers from using the infrastructure.</p> <p>Winter grazing and irrigation are risk factors for adverse effects on water quality, not reverse sensitivity by normal agricultural activities within the rural zone. Water quality is not only already governed through regulations and regional council plans but is also outside of district councils’ jurisdiction to manage. We consider that any definition of Intensively Farmed Stock needs to be reflective and consistent with sector standards and that the dDP is not the appropriate place to give an activity a new definition when that activity is largely outside the jurisdiction of district councils.</p> <p>██████████ recommend the deletion of GRUZ S4 and the amendment of the Intensively Farmed Stock definition to reflect stocking rate rather than irrigation or winter grazing practices.</p>	
<a href="#">131.5</a>	GRUZ – General rural zone	Standards	GRUZ-S4 Intensively farmed stock and stock b	<p>GRUZ-S4: This standard relates to setbacks for intensively farmed stock and stock buildings. In many instances the current standard has major implications to landowners and their ability to farm their land for primary production. We also note that TDC has acknowledged this as a mistake and we ask the TDC to re-develop / amend this standard to a more workable provision after advice from various farming industry groups and feedback that has been provided on this specific standard. We ask that this is done before the draft district plan goes to its further stage.</p>	<p>amend this standard to a more workable provision after advice from various farming industry groups and feedback that has been provided on this specific standard. We ask that this is done before the draft district plan goes to its further stage.</p>

<a href="#">132.5</a>	GRUZ – General rural zone	Standards	GRUZ-S4 Intensively farmed stock and stock b	<p><b>Issue</b></p> <p><i>GRUZ-S4 refers to setbacks for intensively farmed stock and stock buildings. This has major impacts on the ability of land owners to make decisions about future options for farming their land.</i></p>	<p><b>Outcome We Seek</b></p> <p>We understand that TDC have admitted that this standard is a mistake. We ask that prior to presenting the Final Draft Plan to councillors you publish the proposed amendments to this standard and pro-actively seek feedback from various farming industry groups and people who provided feedback on this standard.</p>
	zone				
<a href="#">15.1</a>	GRUZ – General rural zone	Standards	GRUZ-S4 Intensively farmed stock and stock building setbacks from boundaries	<p>1. <i>I strongly disagree with the setbacks defined in this section. Particularly for 'intensively farmed animals'. This will have a severe adverse affect on the rural community and will set a dangerous precedent moving forward. A 400m setback is not a fair distance from any other residential unit. It should be far less for a building. 100m would be more than fair, any further is in my opinion ridiculous and unnecessary. For animals there should be no restrictions you should be able to graze right up to your boundary. Neighbouring properties cannot build right up to their boundary so there is already a buffer of space.</i></p>	

				<p><i>setting buildings and animals back 100m from a road is also unnecessary. Refer to my previous comment regarding animals being allowed to graze to to the boundary.</i></p> <p>2. <i>In summary DO NOT introduce restrictions on setbacks for intensively farmed animals and keep current building restrictions.</i></p> <p><i>how are farmers supposed to keep the grass down in this 400m and 100m setback area? In my opinion it will create a huge fire risk along rural roads.</i></p> <p><i>For a district that is made up of a huge rural area I can't quite believe the impacts this would have on your rural community have not been considered.</i></p>	
<a href="#">62.32</a>	GRUZ – General rural zone	Standards	GRUZ-S4 Intensively farmed stock and stock building setbacks from boundaries	<p><b>Oppose:</b></p> <p><i>Oppose setback controls on intensively farmed stock.</i></p> <p><i>Oppose setbacks to roads or internal boundaries when no identified sensitive activities are present. Setbacks defined in GRUZ-S3 should be sufficient to manage effects in these instances.</i></p> <p><i>Buildings used to house or feed stock is an ambiguous definition. Setbacks from buildings used for intensive primary production are better addressed as a separate standard, as per response to GRUZ-R18.</i></p> <p><i>Amend rule as follows:</i></p> <p><i>Intensively farmed stock, Stock holding areas and milking sheds and buildings used to house or feed stock must be set back a minimum of:</i></p> <p>1. 100m from a road and internal boundaries; and</p>	

				<p>2. 100m from boundaries of land zoned General residential zone, Settlement zone or Maori purpose zone; and</p> <p>4. 400m 300m from residential units on an adjoining site.</p>	
<a href="#">99.7</a>	GRUZ – General rural zone	Standards	GRUZ-S4 Intensively farmed stock and stock b	<p>█ <b>position is:</b></p> <p><i>Oppose in part</i></p> <p><b>Comments relating to feedback</b></p> <p>█ <i>disagrees that intensively farmed stock, stock holding areas, milking sheds and buildings used to house or feed stock should all be set back a minimum of:</i></p> <ul style="list-style-type: none"> <li>• 100m from a road and internal boundaries;</li> <li>• 100m from zone boundaries; and</li> <li>• 400m from residential units on an adjoining site.</li> </ul> <p><i>Intensively farmed stock and associated activities are commonplace in the GRUZ, and are appropriate given the significant pastoral farming land use in that area. █ considers these setback distances could be reduced to more appropriate distances for permitted activity status, particularly for break feeding activities or dairy support grazing which are often temporary and can change location from season to season.</i></p> <p><b>Feedback on the provisions</b></p> <p><i>Amend GRUZ-S4 (and make consequential amendments to related rules/standards) to:</i></p> <ul style="list-style-type: none"> <li>• <i>remove any setbacks associated with intensively farmed stock and/or break feeding of stock outdoors; and</i></li> <li>• <i>reduce the minimum setback for all other activities in GRUZ-S4 to 30m for road and internal boundaries, and from residential units on an adjoining site.</i></li> </ul> <p><i>For example:</i></p>	



				<p><i>GRUZ-S4</i></p> <p><i>Intensively farmed stock, stock holding areas, milking sheds and buildings used to house or feed stock must be set back a minimum of:</i></p> <ol style="list-style-type: none"> <li><i>1. 10030m from a road and internal boundaries; and</i></li> <li><i>2. 100m from boundaries of land zoned General residential zone, Settlement zone or Maori purpose zone; and</i></li> <li><i>3. 40030m from residential units on an adjoining site.</i></li> </ol> <p><i>Make consequential amendments to GRUZ-P2 to reflect the changes requested to GRUZ-S4.</i></p>	
<a href="#">108.14</a>	GRUZ – General rural zone	Standards	GRUZ-S4 Intensively farmed stock and stock b	<p>██████████ understands that the inclusion of ‘intensively farmed stock’ in GRUZ-S4 in this rule is an error that never should have been included in the draft district plan. We understand that there is no intention to include any setbacks for stock from property boundaries.</p> <p>██████ supports the deletion of this from the draft district plan.</p>	
<a href="#">119.4</a>	GRUZ – General rural zone	Standards	GRUZ-S4 Intensively farmed stock and stock b	<p><i>The draft plan notes that the purpose of the general rural zone is to “provide primarily for primary production as well as a limited range of activities that support primary production, and other activities that require a rural location”. While the policies and rules within the plan which are relevant to the general rural zone need to support and enable this purpose.</i></p> <p><i>Farming is a permitted activity within the General Rural Zone, provided the specified performance standards are met. If the standards are not met, the activity becomes a restricted discretionary activity. The standards specified (setbacks) would greatly limit existing farming activities. We understand that some of the setbacks in the draft were not intended to be applied where they have been applied.</i></p> <p><i>It is sought that the setbacks specified in the standards be reviewed, particularly with regard to existing activities, and how various matters are defined. More particularly:</i></p> <ul style="list-style-type: none"> <li>• <i>GRUZ-S2 - Setbacks from residential units</i></li> </ul>	

				<p><i>There may be existing farm infrastructure and facilities within the setbacks specified. These may be protected by the Section 10 provisions.</i></p> <p><i>Existing farm infrastructure and facilities may become non-compliant if a new house was built on an adjoining property within the specified setback. Rule GRUZ-R2 could be revised to control new residential units being constructed on adjoining properties within the setbacks specified.</i></p> <p><i>Adjoining property, and internal boundaries also need to be clarified to as meaning property not owned by the same person (or entity).</i></p> <ul style="list-style-type: none"> <li><i>GRUZ-S4 – Intensively farmed stock and stock building setbacks from boundaries</i></li> </ul> <p><i>As currently written, this rule restricts cattle within the setbacks specified, and a resource consent would be required for cattle within the setbacks. I understand this was not intended. It is suggested that setback is revised (ie no setback for cattle from boundaries).</i></p> <p><i>Also, using the term 'intensive livestock farming' in this draft plan is treating all farmers of this type as a risk to others. Farm practices regardless of type are either well managed or poorly managed. This is already being managed by ECAN through the consenting process for farms which includes farm environment plan and audits, as good management practices. This identifies risk which the TDC could then use for its purpose of identifying risk. The TDC should not be determining whether a farming type is acceptable or not as it is a too broad a mechanism to determine risk.</i></p> <p><i>This issue of defining a farming needs to back to the plan review technical working group to get a better understanding of what measures are already in place and eliminate an unnecessary and costly duplication and restriction.</i></p>	
<a href="#">91.14</a>	GRUZ – General rural zone	Standards	GRUZ-S6 Home business General rural z	<ol style="list-style-type: none"> <li>1. ■■■ notes that a dairy farm is generally operated by a contract milker who lives on site, with other employees also living on the farm. Therefore, in this sense a dairy farm operation is captured by the definition of 'home business'.</li> </ol>	

				<p>2. ■■■ seeks that the definition of ‘home business’ is amended to exclude farming activities, or that dairy farming businesses be excluded from the limit of 2 full time staff living on site.</p>	
<a href="#">133.7</a>	GRUZ – General rural zone	Standards	GRUZ-S7 Manufacturing , altering, repairing,	<p><i>As per PER-1 the maximum gross floor area is permitted to be 100m2. This small maximum area is very problematic, especially as in the definitions even if only a small portion of a building is used for this activity (even if that small portion is separated by internal walls) the measurement is for the whole building. I’m not sure why there needs to be any maximum floor area. With the cost of building no-one wants to build a building larger than what is required to carry out the work required. There is no precise definition of what “manufacturing” or “processing of material” means but if this includes packing/grading sheds and drying facilities then 100m2 is very restrictive. With modern grading and packing sheds for horticultural products it is important that these are built large enough to accommodate optical graders and automatic packers (as is the case in the large fruit and vegetable growing areas of Pukekohe, Bay of Plenty, Nelson and Central Otago). To build such large facilities should be a permitted activity in the Timaru District.</i></p>	<p>That “manufacturing”, “processing of material” be more defined. That if the above definitions include grading/packing/drying then there be no size limit for such buildings. If it doesn’t include these activities then the definition of the “gross floor area” is amended to not include areas not used for manufacturing or processing and that the minimum floor area is increased to 500m2.</p>
<a href="#">62.29</a>	GRUZ – General rural zone	Standards	GRUZ-S1 Maximum height	<p><b>Support in full:</b> Support maximum building height of 15m. Retain as proposed.</p>	