

Appendix 5: Assessment of Options to achieve the Objectives of PC25

This appendix sets out the options considered, and the most appropriate option to achieve the Objectives of PC25:

- Part A - Option Consideration against the PC25 Objectives.
- Part B - Analysis of the formation of provisions to achieve Option 3.

For reference:

Collectively artificial crop protection structures (ACPS), artificial screens and crop support structures (CSS) are referred to as either ‘artificial crop structures’ or ‘crop structures’ or; ‘artificial crop protection and support structures’.

Artificial crop protection structures (ACPS) and artificial screens are referenced through this appendix as either ‘artificial crop protection structures’ or ‘crop protection structures’.

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Part A: Assessment of Options to achieve the Objectives of PC25

PC25 Objectives		
• Ensure the efficient and effective use of rural land for farming purposes is maintained. • Ensure adverse effects on the environment arising from shelterbelts and crop protection structures are appropriately avoided, remedied or mitigated. • Ensure that the district plan accounts for changing land use patterns in a manner consistent with national direction. • Avoid unnecessary resource consent requirements.		
Proposed Options		
Option 1: Status Quo – No Change to the Operative District Plan	Option 2: Plan Change – Highly enabling provisions	Option 3: Plan Change – Amendments to provide for artificial crop protection and support structures, and shelterbelts while mitigating effects on the rural environment.
Status Quo – No change to the Waipa District Plan (WDP) in relation to artificial crop protection structures, artificial screens, crop support structures and shelterbelts.	Plan Change – Highly enabling provisions for artificial crop protection structures, artificial screens, crop support structures and shelterbelts: • ACPS are not buildings • No standards to limit the location, size and scale of these structures • Zero-yard setbacks for shelterbelts	Amendments to the WDP to provide for artificial crop support and protection structures (artificial crop protection structures (ACPS), artificial screens and crop support structures (CSS)), and shelterbelts while mitigating effects on the rural environment. • Specific definitions for ACPS, artificial screens and CSS, with all falling into the overarching definition in the WDP for <i>building</i>. • Clarify ACPS, artificial screens and CSS are ‘Farming Activities’ in the Rural Zone. • Introduce setbacks from road and internal boundaries for ACPS, artificial screens, CSS and shelterbelts. • No site coverage applied to ACPS. • Maximum height controls for artificial crop protection and support structures, and shelterbelts. • Cloth colour controls for ACPS and artificial screens.

PC25 Objectives • Ensure the efficient and effective use of rural land for farming purposes is maintained. • Ensure adverse effects on the environment arising from shelterbelts and crop protection structures are appropriately avoided, remedied or mitigated. • Ensure that the district plan accounts for changing land use patterns in a manner consistent with national direction. • Avoid unnecessary resource consent requirements.		
Proposed Options		
Option 1: Status Quo – No Change to the Operative District Plan	Option 2: Plan Change – Highly enabling provisions	Option 3: Plan Change – Amendments to provide for artificial crop protection and support structures, and shelterbelts while mitigating effects on the rural environment.
		• Restricted discretionary activity in the Landscapes and Viewshafts areas. • Specific controls over the location and form of artificial crop protection and support structures to mitigate effects from the establishment of these structures without the loss of the productive capacity of the rural area. • This option would also place greater control over the location and height of shelterbelts to facilitate better maintenance of these natural screens.
Criteria	Analysis of Option 1:	
Costs	• Unnecessary resource consent requirements. • ACPS require resource consent for exceedance of 3% site coverage as buildings, despite permeable characteristics. • Shelterbelt rules do not achieve the outcomes sought, e.g. trees / plants only permitted if species are unlikely to grow higher than 6m where planted within setback distances from dwellings, roads, transmission lines, waterways and other zones. • Continued uncertainty with plan provisions. • Uncertainty with what is actually permitted to occur when shelterbelts are proposed. • Growers do not have certainty that they can protect their crops, e.g. site coverage is exceeded which is a discretionary activity. • The potential for the underutilisation of the district's the rural productive potential.	

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Proposed Options			
Option 1: Status Quo – No Change to the Operative District Plan		Option 2: Plan Change – Highly enabling provisions	Option 3: Plan Change – Amendments to provide for artificial crop protection and support structures, and shelterbelts while mitigating effects on the rural environment.
	• Not clear that farming activities clearly include crop structures as part of horticultural operations. • Not clear that crop structures are an accepted part of rural character. • Ability for third parties to be involved in the process regardless of whether they are affected or not.		
Benefits	• No cost to Council in preparing and notifying a proposed plan change. • No costs to potential submitters who would participate in the submissions and hearings process.		
Opportunities for economic growth and employment to be provided or reduced	• This option would continue to provide for the existing opportunities that are available. In most instances require additional costs for resource consents to establish ACPS due to unreasonable setback and site coverage provisions in the Rural Zone, and planting restrictions for shelterbelts. This option may reduce the economic potential because in most instances there would be additional costs for resource consents to establish the required size and scale of ACPS and planting provisions for shelterbelts than what is allowable as a permitted activity under the district plan. • This option would continue to provide for the existing opportunities that are available, and overall gives effect to national direction, in particular NSP-HPL. • This option would not avoid the need for resource consents depending on the type of crop to be planted and whether there is a need to provide artificial crop protection.		
Efficiency and Effectiveness of achieving objectives	• This option does not provide an efficient framework to address changing farming trends in the district because there will be continued resource consent requirements for crop protection. • Option 1 requires case-by-case assessment of effects of each proposal; and for people to potentially be unnecessarily involved in the resource consent process which may increase costs and cause time delays.		

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Proposed Options		
Option 1: Status Quo – No Change to the Operative District Plan	Option 2: Plan Change – Highly enabling provisions	Option 3: Plan Change – Amendments to provide for artificial crop protection and support structures, and shelterbelts while mitigating effects on the rural environment.
Risk of acting or not acting if there is insufficient or uncertain information about the subject matter of the provisions	• There is no uncertain or insufficient information.	
Criteria	Analysis of Option 2:	
Cost	• Loss of Council control over the establishment of crop protection and support structures, and shelterbelts. • Uncertainty for neighbouring landowners of the size and scale of ACPS, artificial screens, CSS and shelterbelts. • Cost to Council in preparing, notifying and defending a proposed plan change. • Costs to parties who participate in the submissions, hearings and appeal processes. • Loss of Council control and affected party involvement for the protection of the identified landscapes, viewshafts and cultural values in the district through the resource consent process. • Loss of Council discretion for the protection of the rural environment, and identified landscapes, viewshafts and cultural values in the district. • Loss of Council discretion over the establishment of crop protection and support structures.	
Benefit	• Certainty provided with plan provisions relating to ACPS, artificial screens, CSS and shelterbelts for growers. • The potential for more efficient use of the district's the rural land resource. • Clarity that farming activities include ACPS, artificial screens, and CSS as part of horticultural operations. • Reduction in resource consent requirements.	

PC25 Objectives			
• Ensure the efficient and effective use of rural land for farming purposes is maintained. • Ensure adverse effects on the environment arising from shelterbelts and crop protection structures are appropriately avoided, remedied or mitigated. • Ensure that the district plan accounts for changing land use patterns in a manner consistent with national direction. • Avoid unnecessary resource consent requirements.			
Proposed Options			
Option 1: Status Quo – No Change to the Operative District Plan		Option 2: Plan Change – Highly enabling provisions	Option 3: Plan Change – Amendments to provide for artificial crop protection and support structures, and shelterbelts while mitigating effects on the rural environment.
		• More flexibility to accommodate changing farming trends is provided within the rule framework of the district plan. • The changing farming trends in the district are given greater anonymity within the rule framework of the district plan.	
Opportunities for economic growth and employment to be provided or reduced		• As a result of highly enabling planning provisions, entire sites could be covered. This may equate to increased production and economic benefit. • Highly enabling planning provisions would avoid the need for resource consents when developing an entire site with an artificial crop structures and/or shelterbelts on the external site boundaries in the Rural Zone, where no landscapes or viewshaft areas are overlaid.	
Efficiency and Effectiveness of achieving objectives		• This option provides an efficient framework to address changing farming trends in the district that will not be restrained by the uncertainty of resource consent requirements for crop protection or support. • Would not be effective in ensuring that effects are appropriately considered and managed. • Highly enabling provisions will provide a framework responding to National Policy directions (NPS-HPL). • Would not be effective in ensuring the balance to retain rural character and neighbouring landowners/rural community a degree of certainty of anticipated development.	
Risk of acting or not acting if there is insufficient or uncertain information about the subject matter of the provisions		• There is no uncertain or insufficient information.	

PC25 Objectives • Ensure the efficient and effective use of rural land for farming purposes is maintained. • Ensure adverse effects on the environment arising from shelterbelts and crop protection structures are appropriately avoided, remedied or mitigated. • Ensure that the district plan accounts for changing land use patterns in a manner consistent with national direction. • Avoid unnecessary resource consent requirements.		
Proposed Options		
Option 1: Status Quo – No Change to the Operative District Plan	Option 2: Plan Change – Highly enabling provisions	Option 3: Plan Change – Amendments to provide for artificial crop protection and support structures, and shelterbelts while mitigating effects on the rural environment.
Criteria	Analysis of Option 3:	
Cost	• Potential cost to growers in constraints on how orchards are set out to accommodate performance standards. • Cost to Council in preparing, notifying and defending a proposed plan change. • Costs to potential submitters who participate in the submissions, hearings and appeal processes.	
Benefit	• Provides a clear planning framework for changing farming trends in the district associated with the development of artificial crop protection and support structures, and shelterbelts in the Rural Zone. • Balances productive rural land use against loss to rural character and amenity values. • Council staff, neighbours and growers will have certainty of mitigation controls for the development of crop support and protection associated with farming activities. • Reduction in resource consent requirements. • Consideration of effects on rural amenity, landscapes and viewshafts enabled. • Balanced setback requirements from road and internal boundaries for ACPS, artificial screens, CSS and shelterbelts. • Clarity of the maximum height of shelterbelts, ACPS, artificial screens and CSS. • Controls of the colour of cloth materials use on ACPS and artificial screens.	
Opportunities for economic growth and employment to be provided or reduced	• This option would provide enhanced opportunity for economic growth and employment subject to effects being avoided or mitigated. • This option would achieve opportunity for economic growth and employment; and Council's obligation to give effect to the National Policy Statement for Highly Productive Land. • This option would avoid unnecessary resource consents in the Rural Zone, where the Landscapes and Viewshaft areas are not overlaid.	

PC25 Objectives			
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Proposed Options			
Option 1: Status Quo – No Change to the Operative District Plan		Option 2: Plan Change – Highly enabling provisions	Option 3: Plan Change – Amendments to provide for artificial crop protection and support structures, and shelterbelts while mitigating effects on the rural environment.
Efficiency and Effectiveness of achieving objectives	• Provides effective planning framework to address changing farming trends within the District’s rural environment. • The provision of specific rule set for artificial crop protection and support structures, and shelterbelts will enable more efficient use of rural land alongside the ability to manage adverse effects on rural character and adjoining sites. • The provisions will provide a planning framework that effectively responds to National Policy directions (NPS-HPL), effectively provides a means by which adverse effects can be managed. • The provisions will effectively provide a planning framework that responds to National Policy directions (NPS-HPL), assisting in safeguarding the productive capacity of the district’s rural land.		
Risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions	• There is no uncertain or insufficient information.		

In considering the options, it is considered that **Option 3 is most** appropriate for because the benefits outweigh the costs and is the most efficient and effective in achieving the objectives for the Plan Change.

Part B: Analysis of the formation of provisions to achieve Option 3

Analysis of the formation of provisions to achieve Option 3: Plan Change – Amendments to provide for artificial crop protection and support structures, and shelterbelts while mitigating effects on the rural environment.

Option 3:

Proposed provisions providing for artificial crop protection and support structures, and shelterbelts while mitigating effects on the rural environment:

- Provide specific definitions for artificial crop protection structures, artificial screens and crop support structures.
- Add reference to artificial crop protection structures, artificial screens and crop support structures within the definition of 'Farming Activities'.
- Add setback requirements from road and internal boundaries for artificial crop protection structures, artificial screens, crop support structures and shelterbelts in the rural zone.
- Exempt artificial crop protection structures from building site coverage requirements in the Rural Zone.
- Add new maximum height controls for artificial crop protection and support structures, and shelterbelts in the Rural Zone.
- Add new maintenance requirements for shelterbelts in the Rural Zone.
- Specify cloth colour controls for artificial crop protection structures and artificial screens.
- Provide for artificial crop protection structures, artificial screens and crop support structures as a restricted discretionary activity in the Landscapes and Viewshaft areas.
- Provide for artificial crop protection structures, artificial screens and crop support structures, and shelterbelts as restricted discretionary activities in Viewshaft areas where they are located within 400m of a public road.

Issues:

1. How should artificial crop protection and support type structures associated with farming activities be provided for in the district plan?
2. What standards should be applied for artificial crop protection and support type structures?
3. How should shelterbelts be defined and managed in the district plan?

Issues to be addressed in determining most appropriate planning provisions under Option 3

Issue 1: How should artificial crop protection and support type structures associated with farming activities be provided for in the district plan?
Commentary: The purpose of the Rural Zone is to provide for and protect the rural land resource to ensure on-going productivity in the rural environment. Farming activities in the Rural Zone are a permitted activity and are defined by the district plan as specifically including both agricultural and horticultural activities for the primary production of goods for human or animal consumption through the use of in-situ soil, vegetation, water and air as the medium for production. This achieves the objective of the NSP-HPL requiring Council to prioritise the use of highly productive land for primary production, including horticultural activities ‘reliant on the soil resource of the land’, such as those supported by permeable and unfloored crop protection structures. The structures that can be required as part of a horticultural operation, and which differ from a traditional glasshouse or plastic-clad tunnel house are not presently listed in the definition of farming activities. As outlined in the Background section of the S.32 Evaluation Report, orchards such as kiwifruit, require greater protection of crops to improve production efficiencies. To achieve the objectives of PC25 the district plan needs to determine and define what these types of structures are, how they can be appropriately accommodated in the rural environment, and how any effects arising from the establishment of these structures can be avoided or mitigated.
Options to achieve Issue 1:
Option a. – add artificial crop protection and support structures as a specific activity and include specific definitions for these structures.
Option b. – amend the definition of farming activities to include reference to artificial crop protection and crop support structures and add definitions for both of these structures. Rely on the existing definition for <i>Building</i> in the district plan for the administration of planning standards.
Analysis: The definition for farming activities specifically includes horticultural activities and therefore by association any ancillary structures associated with them. Unlike other farm activities and buildings, they are not currently identified in the definition. To remove doubt in what is intended to be included by the farming activities definition, it is proposed to add, alongside glasshouses, reference to artificial crop protection structures,

Issue 1: How should artificial crop protection and support type structures associated with farming activities be provided for in the district plan?

artificial screens and crop support structures. Because of this it is not necessary to provide for artificial crop protection structures, artificial screens or crop support structures as separate activities in their own right. These structures should be treated the same as other farm buildings, such as hay barns for agricultural activities.

In developing the preferred provisions, reference has been had to how farming activities are defined in the National Planning Standards. Farming activities as defined in the WDP, are not specifically defined by the National Planning Standards (NPS) and would fall under the definition for *Primary Production*, which is defined to mean:

- (a) Any aquaculture, agricultural, pastoral, horticultural, mining, quarrying or forestry activities; and
- (b) Includes initial processing, as an ancillary activity, of commodities that result from the listed activities in a);
- (c) Includes any land and buildings used for the production of the commodities from a) and used for the initial processing of the commodities in b); but
- (d) Exclude further processing of those commodities into a different product.

Feedback received during the engagement period wanted the existing definition for farming activities to be replaced with the NPS definition *Primary Production*. As stated in section 5.4 National Direction of the s.32 Evaluation Report, the WDP has not yet been changed to align with national planning standards. It is considered inappropriate to adopt definitions from the NPS through PC25.

It is considered necessary to reference artificial crop protection and support structures in the definition of *farming activities*. All structures associated with farming activities also fall to be defined as buildings where they meet the criteria in the definition of *building* provided by the WDP and/or the definition of structure in the RMA. The existing WDP definition for *building* includes “any buildings or structures whether temporary or permanent, moveable or immovable”. All structures associated with farming activities fall to be defined as buildings if meeting the criteria set through the definition for *building* in the WDP. Therefore, it is considered more appropriate to reference to artificial crop protection and support structures within the definition for *farming activities*. It is not therefore appropriate to exclude artificial crop protection and support structures from the definition of *building*.

Nevertheless, it is considered that appropriate planning standards are applied to mitigate any effects, provide a greater level of certainty for neighbouring properties and remove unnecessary resource consent requirements for artificial crop protection and support structures when established as part of farming activities.

Preferred Option

In weighing both options, Option b. is considered to be the most appropriate to address Issue 1 and set the direction in determining the most appropriate provisions to achieve the objectives of the plan change.

Issue 2: What standards should be applied for artificial crop protection and support type structures?
Commentary: To achieve the objectives of PC25, proposed planning standards need to ensure the on-going productivity in the rural environment while mitigating any specific effects arising from the establishment of such structures in both the Rural Zone and the Landscapes and Viewshaft areas. In the district plan, all proposed buildings and structures in the Rural Zone are to comply with the bulk and location requirements for setbacks, height, height in relation to boundary, and site coverage. These standards have been tested through the resource consents (and by negotiated consent order) for proposed and retrospective artificial crop protection structures and shelterbelts. In each case dispensation from the baseline for setbacks and site coverage has been granted. The formulation of provisions must achieve the objectives of PC25, which in turn are required to achieve the purpose of the RMA. The district plan must also give effect to the relevant national policy statements, being the National Policy Statement for Highly Productive Land (NPS-HPL). Accordingly, consideration of the relevance and appropriateness of the existing provisions, and what should be proposed to achieve the objectives of the plan change. It is clear that existing performance standards relating to height, setbacks and site coverage are not appropriate for artificial crop structures.
Options to achieve Issue 2:
Option a. – retain existing development control standards for buildings in the Rural Zone and to continue to apply these standards to proposed artificial crop protection and support structures.
Option b. – amend existing development control provisions (setbacks, height, and site coverage) so that they appropriately relate to the management of effects arising from the establishment of artificial crop protection and support structures. These standards recognising that the effects of crop structures are different from those effects typically associated with other farm buildings.
Option c. - amend existing development control provisions so that they appropriately relate to the management of the effects arising from the establishment of artificial crop protection and support structures (as per Option b) and introduce new provisions to address materials, cloth colour and separation distances from network utilities.
Analysis: While artificial crop protection and support structures (falling under the definition for <i>building</i>) are anticipated as part of permitted <i>farming activities</i>, it is recognised that these structures are different to buildings / structures typically associated with farm operations under the existing rule set for the Rural Zone. Appropriate planning standards in this respect should:

Issue 2: What standards should be applied for artificial crop protection and support type structures?

- be applied to manage effects arising from the establishment of artificial crop protection and support structures, in the same manner as is applied to other structures established as part of farming activities in the Rural Zone; and
- retain the existing planning standards set out in Section 25 – Landscapes and Viewshaft areas requiring a resource consent in line with any other buildings proposed to be located within the Landscapes and Viewshaft areas.

Preferred Option

In weighing all options, Option c. is considered to be the most appropriate way to address the achievement of Issue 2 and set the direction in determining the most appropriate direction to achieve the objectives of the plan change.

Issue 3: How should shelterbelts be defined and managed in the district plan?

Commentary:

The purpose of the Rural Zone is to provide for and protect the rural land resource to ensure on-going productivity in the rural environment. Shelterbelts, along with hedges are a common landscape feature in the Rural Zone. The WDP already provides performance standards for shelterbelts (Rule 4.4.2.58).

Under the WDP, both Shelterbelts and Hedges are already defined:

Hedge: means a row of bushes or trees planted close together to form a fence or boundary, and provide screening.

Shelterbelt: means a row of trees not more than four deep, planted for the purpose of providing wind shelter and screening.

Shelterbelts in the Rural Zone can be planted up to the boundary of a site, where the tree species being planted will not grow to be more than 6m in height (Rule 4.4.2.58). In situations where the tree species being planted can grow higher than 6m the following setback standards are applied:

- 30m from any dwelling on an adjoining site
- 30m from any site boundary with residential zones, Large Lot Residential or Marae Development Zone
- 20m from any strategic arterial road and 10m from any other road or railway
- 10m to a vertical line directly below an overhead power or telephone line
- 5m from the edge of any lake or from the banks of any waterbodies except for trees relating to protection or soil conservation works.

Issue 3: How should shelterbelts be defined and managed in the district plan?
There is evidence throughout the district that these provisions have been misinterpreted and incorrectly applied. In some situations, this has led to enforcement action and retrospective resource consent applications. Many shelterbelts are planted on boundaries with species that grow more than 6m in height without consideration of adjoining activities. As a result of most recently approved resource consents, shelterbelts have been either setback from site boundaries and/or height controlled to a maximum of 6m. Adjoining property owners have raised concerns with the establishment of shelterbelts in the Rural Zone giving rise to adverse effects such as shading and forced maintenance when the shelterbelts have been planted on the shared boundary. Shelterbelts are not only planted in association with horticultural activities but are also planted in association with other rural activities and non-rural activities within the Rural Zone (such as a ‘lifestyle blocks’). There has also been clarification sought as part of the PC25 community engagement on the difference between a ‘hedge’ and a ‘shelterbelt’. As a result of field work, it is apparent that the heights of hedges in the Rural Zone vary greatly from shelterbelts. They are normally located on the boundaries of sites to form the physical barrier between properties. There is a distinction between hedges and shelterbelts which should be recognised and provided for in the rule set.
Options to achieve Issue 3:
Option a. – Amend the existing definitions for shelterbelts to provide additional descriptors of what these are to be taken to mean and continue to apply existing Rule 4.4.2.58 – Tree Planting.
Option b. – Introduce new standards specifically for shelterbelts in the Rural Zone.
Analysis: The definitions for shelterbelts and hedges clearly state the form and purpose of both types of natural screening, with hedges being a single row and for screening purposes, while shelterbelts are defined as consisting of up to 4 rows of trees with the purpose of both screening and wind shelter. Existing Rule 4.4.2.58 – Tree Planting is a ‘catch-all’ rule for the planting of woodlot forests, commercial forests and shelterbelts. The rule requires that where any of these activities, consist of tree species that are likely to grow to more than 6m in height, they must be planted to comply with the following setback requirements: • 30m from any dwelling on an adjoining site; or • 30m from any site boundary of the Residential Zone, Medium Density Residential Zone, or Large Lot Residential Zone or Marae Development Zone; or • 20m from any strategic arterial road and 10m from any other road or railway; or

Issue 3: How should shelterbelts be defined and managed in the district plan?

- 10m to a vertical line directly below an overhead power or telephone line; or
- 5m from the edge of any lake or from the banks of any water bodies except trees which are planted for river protection works, soil conservation or for conservation planting.

Rule 4.4.2.58 does not provide any direction on how maintenance following planting is to be undertaken. There are no existing provisions in the district plan that address shelterbelt maintenance. Feedback received from the horticultural industry has advised that maintenance of shelterbelts is an important part of overall orchard operations, as shelterbelts need to be trimmed to adequately provide wind shelter, and to avoid encroachment of trees into the growing areas of the orchards. This does not address effects of shelterbelts on adjoining properties, where maintenance obligations can fall to the owners of adjoining land. Also, the most common shelterbelt species (cryptomeria), that can grow up to 70m height, makes up many shelterbelts in the Rural Zone. These are often planted on the property boundaries without regard to the specifics of Rule 4.4.2.58.

For these reasons it is considered that Option a. would not effectively address the issues that have been raised in relation to the establishment and maintenance of shelterbelts. The existing definitions in themselves clearly define a difference between the hedges and shelterbelts via the intended purpose and number of rows. Modifying the specifics of these definitions would not rectify the issues relating to the physical effects shelterbelts can cause. Consequently, there is a need to review the specific standards relating to shelterbelts, to address height, location at planting and on-going maintenance post planting.

Option b. has a focus on specifically addressing the issues arising from shelterbelts. Therefore, it is considered that this option would, through the introduction of specific provisions for the management of shelterbelts, effectively manage adverse effects arising from the planting and/or maintenance of shelterbelts in the Rural Zone.

Preferred Option

Option b. is the most appropriate to address Issue 3 and set the direction in determining the most appropriate provisions to achieve the objectives of the plan change.

Summary of preferred direction to use in determining most appropriate planning provisions under Option 3

Issue 1 How should artificial crop protection and support type structures associated with farming activities be provided for in the district plan?

Option b.

Amend the definition of *farming activities* to include reference to artificial crop protection and support structures, add definitions for the purpose and form of each of these structures, and rely on the existing definition for *building* in the district plan for the administration of performance standards.

Issue 2 What standards should be applied for artificial crop protection and support type structures?

Option c.

Amend certain existing provisions to provide provisions (setbacks, height, and site coverage) and introduce specific provisions to address materials, cloth colours and separation distances from network utilities to manage effects arising from artificial crop protection and support structures that differ from known effects that arise through the establishment of other types of farm buildings.

Issue 3 How should shelterbelts be defined and managed in the district plan?

Option b.

Introduce a new standard specifically for shelterbelts in the Rural Zone.

Commentary

The consideration, set out above, of the most appropriate way to achieve each identified issue has confirmed Option 3 as the most appropriate option. Option 3 provides the most alignment with the preferred actions necessary to address the three Issues that have been identified and therefore is the most appropriate to achieve the objectives of PC25. Option 3 proposes amendments to the WDP to provide for artificial crop support and protection structures, and shelterbelts while mitigating effects on the rural environment by:

- Specific definitions for ACPS, artificial screens and CSS, with all falling into the overarching definition for buildings
- Clarify ACPS, artificial screens and CSS are ‘Farming Activities’ in the Rural Zone
- Introduce setbacks from road and internal boundaries for ACPS, artificial screens, CSS and shelterbelts
- No site coverage applied to ACPS
- Maximum height controls for artificial crop protection and support structures, and shelterbelts
- Cloth colour controls for ACPS and artificial screens
- Restricted discretionary activity in the Landscapes and Viewshafts areas
- Specific controls over the location and form of artificial crop protection and support structures to mitigate effects from the establishment of these structures without the loss of the productive capacity of the rural area.
- New controls over the location, height and maintenance of shelterbelts.

Assessment of Option 3 to achieve the objectives of PC25

Overall Assessment of Option 3:	
Option 3 – to propose amendments to the ODP to provide for artificial crop support and protection structures, and shelterbelts while mitigating effects on the rural environment is considered the most appropriate because: - the benefits outweigh the costs; and - it is the most efficient and effective option to achieve the objectives of PC25	
Effectiveness/Efficiency	Benefit/Cost: (Environmental, Economic, Social, Cultural Effects)
Effectiveness: - The provision of specific rule set for artificial crop protection and support structures, and shelterbelts will provide for the productive use of rural land alongside the protection of the district's rural character and management of effects on adjoining sites. - The provisions provide an effective planning framework that responds to National Policy directions (NPS-HPL), enables management of effects on rural character and landscape values, and safeguard the productive capacity of the district's rural land.	Benefits: - Provides a clear planning framework to enable the development of artificial crop protection and support structures, and shelterbelts as permitted activities in the Rural Zone. - Gives effect to the NPS-HPL. - Reduction in resource consent requirements. - Enables consideration and management of effects on rural character and amenity, landscape values and viewshafts. - Provides a balance between productive rural land use and management of changes to rural character and amenity. - Greater certainty is provided of what development controls (e.g. setbacks, height) apply to artificial crop protection and support structures, and the planting and maintenance of shelterbelts. - Specific performance standards include: - Setback requirements from road and internal boundaries - Maximum height - Controls of the colour of cloth materials - Provides a clear planning framework to address proposals to establish crop structure and shelterbelts in the Landscapes and Viewshaft areas as identified by the district plan.
Efficiency: Provides efficient planning framework, including permitted activity pathway, to address proposals for establishment of crop structures and shelterbelts within the Rural Zone.	Costs: Cost to Council in preparing, notifying and defending a proposed plan change.

Overall Assessment of Option 3:	
	• Costs to submitters who participate in the submissions and hearings process. • Potential costs to growers in designing development to comply with performance standards.
Opportunities for economic growth and employment to be provided or reduced:	
• This option provides opportunity for economic growth and employment; • This option provides pathway to avoid unnecessary resource consents in the Rural Zone, outside of Landscape and Viewshaft areas.	
Risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions:	
There has been sufficient information about artificial crop protection and support structures, and shelterbelts to provide certainty of the direction being proposed through Option 3 and the proposed provisions to achieve the objectives of PC25.	
To achieve Option 3 a suite of provisions needs to be introduced into the WDP. An assessment of the appropriateness of the proposed provisions is set out in Appendix 9 under the following headings: • Part B – Definitions • Part D – Zone Provisions: Section 4 – Rural Zone • Part E – District Wide Provisions: Section 21 – Assessment Criteria and Information Requirements • Part F – District Wide Natural and Cultural Heritage: Section 25 – Landscapes and Viewshafts	