



Waitaki

DISTRICT COUNCIL

TE KAUNIHERA Ā ROHE O WAITAKI

**I hereby give notice that the
District Plan Review Sub-Committee Meeting
will be held on:**

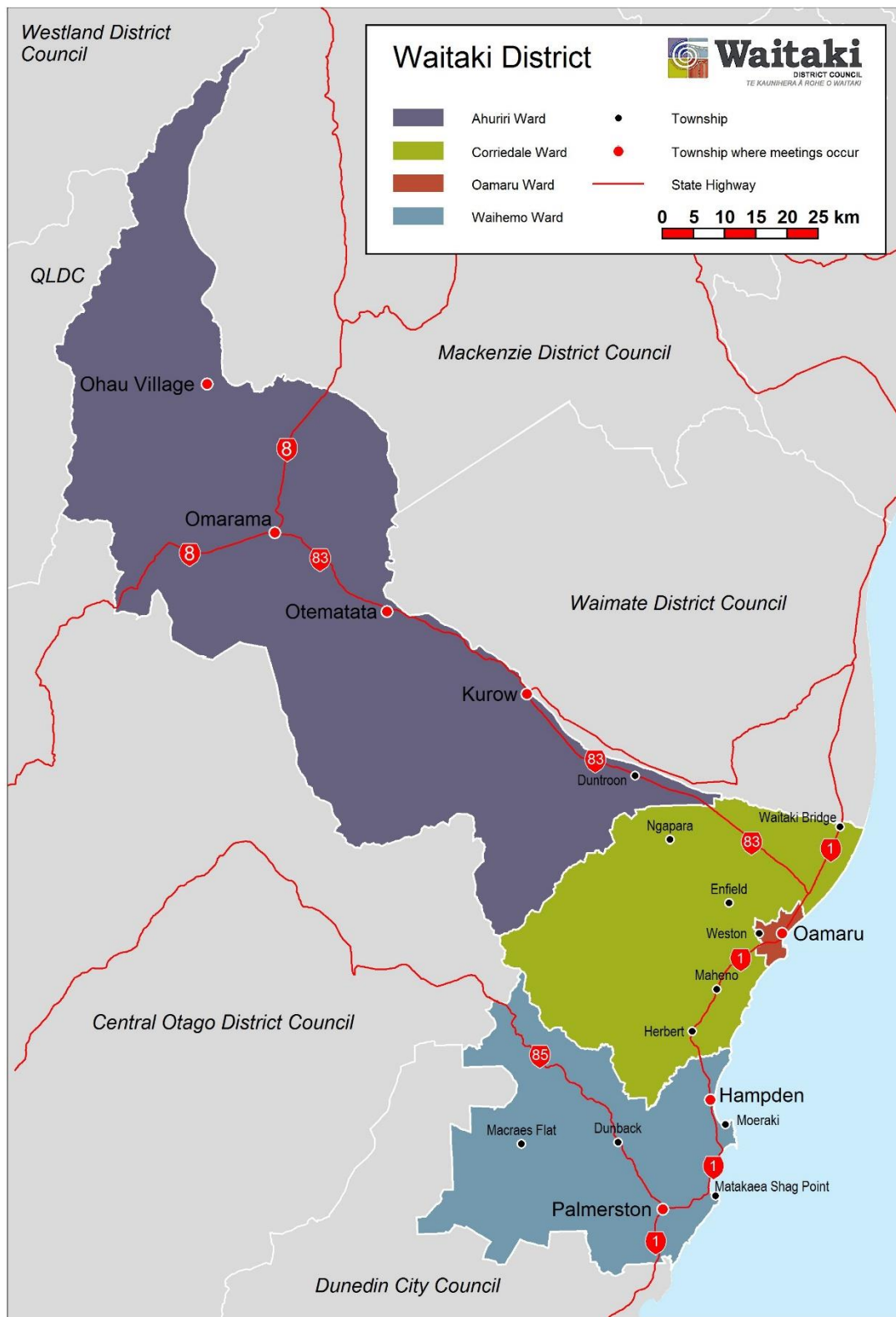
Date: Thursday, 10 April 2025
Time: 9:00 am
Location: Council Chamber, Third Floor
Office of the Waitaki District Council
20 Thames Street, Oamaru

Agenda

District Plan Review Sub-Committee Meeting

10 April 2025

**Alex Parmley
Chief Executive**





Agenda Items

1	Apologies	5
2	Declarations of Interest	5
3	Decision Reports	6
3.1	Staff Submissions to Proposed Waitaki District Plan	6
4	Meeting Close	22

- 1 APOLOGIES**
- 2 DECLARATIONS OF INTEREST**

3 DECISION REPORTS

3.1 STAFF SUBMISSIONS TO PROPOSED WAITAKI DISTRICT PLAN

Author: David Campbell, Heritage & Planning Manager

Authoriser: Roger Cook, Director Natural and Built Environment

Attachments: 1. Proposed Waitaki District Plan – Recommended Staff Submission Points  

RECOMMENDATION

That the District Plan Review Sub-Committee recommends:

That Council:

1. Accepts the staff submissions as attached to this report and that these be lodged to the Proposed Waitaki District Plan.

DECISION OBJECTIVE

To ratify Waitaki District Council's (WDC's) submission to the Proposed Waitaki District Plan.

SUMMARY

The Proposed Waitaki District Plan (PDP) was publicly notified on 1 March 2025, with submissions closing on 9 May 2025. Leading up to the approval of the PDP, the District Plan Review Subcommittee and planning staff have identified a number of minor issues that should be further considered through potential staff submissions.

DECISION-MAKING EXPECTATIONS

Governance Decision-Making:	Recommend that Council ratifies the Waitaki District Council's submission on the PDP.
Operational Decision-Making:	Lodge the submission once approved by Council.
Communications	Media Releases – contributed to by officers and Elected Members Media/public enquiries regarding governance decision-making topics above can be addressed by governance Media/public enquiries regarding operational decision-making topics above can be addressed by officers

SUMMARY OF DECISION-MAKING CRITERIA

	No/Moderate/Key		No/Moderate/Key
--	-----------------	--	-----------------

Policy/Plan	Key	Environmental Considerations	No
Legal	Moderate	Cultural Considerations	No
Significance	No	Social Considerations	No
Financial Criteria	No	Economic Considerations	No
Community Views	No	Community Board Views	No
Consultation	No	Publicity and Communication	No

BACKGROUND

Since November 2023, the Sub-Committee met on various occasions to consider the PDP provisions to recommend to Council for approval, culminating on 17 December 2024 when Council approved the PDP for notification. Throughout this period, particularly near the end, various minor matters have arisen that can be considered by way of a staff submission to the PDP, as endorsed by Council. Many of these are corrections and clarifications, most seeking to improve the operation of the PDP. Some are as a result of further information or review work and may also be submitted on separately by other parties.

A list of staff submission points is attached to this report and this sets out the recommended actions on each as well as the reasoning for these.

SUMMARY OF OPTIONS CONSIDERED

Option 1 – Recommend Council endorses the staff submissions

Option 2 – Does not recommend Council endorses the staff submissions.

ASSESSMENT OF PREFERRED OPTION

Option 1 is preferred as it will result in better outcomes for the PDP and also addresses, where possible, matters raised by the Sub-Committee at previous meetings.

CONCLUSION

Council is asked to formally ratify the Waitaki District Council submission on the PDP.

ADDITIONAL DECISION-MAKING CONSIDERATIONS

Waitaki District Council Strategic Framework

Outcomes

Community Outcomes

Prosperous District

- Attractive to new opportunities
- Supporting local businesses
- Fostering a diverse and resilient economy

Strong Communities

- Enabling safe, healthy communities
- Connected, inclusive communities
- Promoting a greater voice for Waitaki
- Celebrating our community identity

Quality Services

- Robust core infrastructure and services
- Community facilities and services we are proud of

Valued Environment

- Protecting our diverse landscapes and water bodies
- Meeting environmental and climate change challenges

Policy and Plan Considerations

The submission is to the PDP, which is a key Plan of Council.

Community Views

Nil – the community has the opportunity to submit on the PDP.

Financial Considerations

Nil

Legal Considerations

A staff submission is the correct process to address the matters.

Environmental Considerations

Nil

Publicity and Community Considerations

Nil

Appendix 1: Proposed Waitaki District Plan (PDP) – recommended staff submission points

District Plan Review Sub-Committee (DPRSC) recommendations			
Chapter	Description of submission point	Rationale for submission	Officer commentary
Definitions	<ul style="list-style-type: none"> Review agricultural intensification definition in the PDP which currently reads: <i>‘in relation to the Ecosystems and Indigenous Biodiversity chapter, Natural Features and Landscapes chapter, and the Sites and Areas of Significance to Māori chapter, means change from non-irrigated primary production (including plantation forestry) to irrigated agricultural production, on land that is not currently irrigated. It also includes any change from irrigated crop and seed production to dairy-farming.’</i> 	<ul style="list-style-type: none"> DPRSC requested submission point from its meeting of 12 December 2024 resolution to review definition to remove reference to (or moderate) ‘irrigation’. 	<ul style="list-style-type: none"> The definition of agricultural definition released in the <u>Draft</u> District Plan (2022) read as follows: <i>‘means change in pastoral activities, including agricultural conversion arising from direct drilling, cultivation, top dressing, oversowing and irrigation but does not include dryland farming. It does not include changes to stocking rates, animal species or breed, or changes as a result of changes to feed types where it does not involve the above activities.’</i> Following DPRSC consideration of feedback on the Draft District Plan, the definition was further refined to only apply to certain chapters and a narrowing of the scope of the definition. Officers recommend that the PDP definition be retained in its present form and await public submissions. Any submissions can then be responded to by way of further submissions if appropriate.
Historic Heritage	<ul style="list-style-type: none"> Outline how the Town Centre Design Guidelines for Ōamaru Historic Area are to be assessed (within the HH chapter) and which, if any, should become standards. 	<ul style="list-style-type: none"> DPRSC requested submission point from its meeting of 17 December 2024 	<ul style="list-style-type: none"> The Town Centre Design Guidelines for Ōamaru Historic Area are contained within the PDP as Appendix 13. They are therefore required to be given consideration

			<p>to for works to any historic heritage item within the Ōamaru Historic Area.</p> <ul style="list-style-type: none"> • HH(OHA)-P4 and HH(OHA)-P6 requires that development and signage is consistent with the guidelines. • HH(OHA)-R7 identifies consistency with the guidelines as a matter of discretion for the construction of new buildings or external alterations to existing buildings where these are visible from a public place. • HH(OHA)-S1 identifies consistency with the guidelines as a matter of discretion for veranda signs within the Ōamaru Historic Area. • Officers recommend that the guidelines remain as guidelines rather than standards to provide a framework to encourage good design rather than prescriptive standards/requirements that do not always take into account site/building specific restraints. The guidelines diversity provides for innovative, adaptable and quality design aimed at protecting and enhancing streetscape, historic heritage, amenity and the environment. It is a precursor that shapes owners, developers and designers' awareness, understanding and expectations of the Ōamaru Historic Area when first visualising their development. A submitted development application often depends greatly upon the initial expectations of
--	--	--	---

			owners, developers and the skill of the designer working within that brief to fit in with and complement the Historic Area. A picture speaks a thousand words.
Ecosystems and Indigenous Biodiversity	<ul style="list-style-type: none"> Use a percentage-based threshold allowance for indigenous vegetation clearance in sensitive ecological environments that are not currently identified as Significant Natural Areas, instead of a fixed m2 threshold. 	<ul style="list-style-type: none"> DPRSC requested submission point from its meeting of 18 December 2023 	<ul style="list-style-type: none"> Biodiversity Officer advice that this approach would require extensive ecological surveys to determine/evidence the appropriate percentage thresholds for each of the different habitats identified in the standard. Should the DPRSC wish to pursue this approach, it is recommended that this is considered as a variation to the plan to allow for the time and resources required to evidence the thresholds. Officers recommend that this submission point is not progressed at this stage to await submissions/hearings and to review after this process as a potential plan variation.
Officer recommendations:			
Transport	<ul style="list-style-type: none"> The Transport chapter requires clarification on when a road is required to vest. 	<ul style="list-style-type: none"> There is currently no clarification in the PDP on the number of residential units that would trigger the requirement for a road to vest. 	<ul style="list-style-type: none"> TRAN-S3 Table 7 defers to NZS 4404:2010 Land Development and Subdivision Infrastructure for minimum legal widths and formation requirements for private ways/vehicle access lots serving over 6 residential units. Councils Development Engineer recommends that the Operative District Plan requirement for a vehicle access to serve more than 10 units is maintained as an appropriate limit for a road to vest.

Stormwater	<ul style="list-style-type: none"> Amendment to STORM-S3(2a) to remove requirement for stormwater treatment device to be designed to a 100-year Average Recurrence Interval (ARI) flood event. 	<ul style="list-style-type: none"> Recommendation to update STORM-S3(2a) to read: 2. <i>Any stormwater treatment device or system must be:</i> a. <i>sized, designed and built so that peak stormwater flow provides the level of service in Table 4 – Required AEP for design storms and is no greater than the pre-development peak stormwater flow.</i> 	<ul style="list-style-type: none"> Officer recommendation to amend this standard to remove the requirement for stormwater treatment device to be designed to a 100-year Average Recurrence Interval (ARI) flood event. This requirement is unrealistic to achieve and advice from Council's Development Engineer advises that the requirement is only relevant where there is no secondary flow path or secondary system available. A more appropriate approach would be to refer to the requirements contained in Table 4 of the STORM chapter which would require the 1 in 2-year and 1 in 10-year ARI design for the primary disposal system only and only require the 1 in 100-year ARI where there is no secondary flow path or secondary system available. Officers recommend that the standard STORM-S3 is amended accordingly.
Stormwater	<ul style="list-style-type: none"> Amendment to STORM-S1(2) and STORM-S2(1c) to remove the requirement for a resource consent within a flood hazard overlay where a connection to a stormwater management system is not available and the means of stormwater disposal is to ground and replace with a standard that requires the applicant to provide evidence of suitable ground soakage conditions where connection to a stormwater management system is not available. 	<ul style="list-style-type: none"> The Canterbury Flood Assessment overlay captures urban areas within the Canterbury part of the district. The standard as currently written will require a resource consent for new builds in these areas as there is currently no stormwater management system available. In these areas, the common primary disposal method for stormwater is on-site to soak pits. 	<ul style="list-style-type: none"> Infrastructure team have agreed that it links to the above matter so that if the stormwater system can be designed to a 1 in 10-year ARI, then over and above this will be onerous regardless of the flood hazard overlay. If they have to get advice from ECan in any case for the building in a flood hazard area, then this advice should include stormwater aspects as well.

		<ul style="list-style-type: none"> Advice from Council's Development Engineer is as follows: <i>'My concern with the current wording is that for example the entire Waitaki Valley (Dunroon to Ōmārama) is shown to be in the Canterbury Flood Assessment Overlay. We know historically that stormwater disposal in most cases is to ground given the alluvial soils. The current wording would therefore require every PIM/Building Consent in the Waitaki Valley which proposes a soakpit, to also submit a resource consent to show compliance with STORM-S1 and S2.'</i> 	
Natural Hazards	<ul style="list-style-type: none"> Deletion of note in rule NH-R8 	<ul style="list-style-type: none"> The note is providing an exemption pathway for activities that already have a resource consent and is not relevant. 	<ul style="list-style-type: none"> Officers recommend that the note in NH-R8 that reads, <i>'Where a building or structure is constructed in accordance with any geotechnical conditions of a resource consent that has already been approved within the last two years from 1 March 2025, then this rule can be considered to be complied with'</i> should be deleted. The note is not relevant to the rule if a resource consent has already been granted.
Natural Hazards	<ul style="list-style-type: none"> Deletion of note in rule NH-R9 	<ul style="list-style-type: none"> The note is providing an exemption pathway for activities that already have a resource consent and is not relevant. 	<ul style="list-style-type: none"> Officers recommend that the note in NH-R9 that reads, <i>'Where a building or structure is constructed in accordance with any geotechnical conditions of a resource consent that has already been approved within the last two years from 1 March 2025, then this rule can be considered to be complied with, with respect to proposals for buildings and</i>

			<i>structures (including additions and alterations).’</i> should be deleted. The note is not relevant to the rule if a resource consent has already been granted.
Natural Hazards	<ul style="list-style-type: none"> Updated flood mapping received from ORC for Frenchs Road area 	<ul style="list-style-type: none"> Updated mapping received from ORC (post notification) to be included. 	<ul style="list-style-type: none"> An update on the flood hazard mapping for Frenchs Road was received from Otago Regional Council after the PDP was notified. This needs to be added to the planning maps – Flood Hazard Overlay.
Natural Hazards	<ul style="list-style-type: none"> NH-R6. Land use activities in the Canterbury Flood Assessment Overlay, The Otago Flood Assessment Overlay and the Waitaki River Floodplain Overlay (except as provided for by NH-R4 and NH-R5). Amend RDIS-1 to read: <i>Compliance is not achieved with PER-1 and if the activity is located within the Canterbury region of the District, it is not located in a High Flood Hazard Area as determined in a flood assessment certificate prepared in accordance with NH-S1.</i> 	<ul style="list-style-type: none"> Amend wording to add for grammatical and rule consistency through the addition of a comma after ‘District’. 	<ul style="list-style-type: none"> Officers recommend correcting the grammar in RDIS-1 to improve clarity.
Historic Heritage	<ul style="list-style-type: none"> Define extent of quarry site heritage items 	<ul style="list-style-type: none"> Approximately six quarry related heritage items that do not currently have clear definition of extent need to be mapped to provide certainty rather than the ‘point’ that is currently mapped. 	<ul style="list-style-type: none"> The extent of the quarry site heritage items are currently being assessed by a heritage consultant and will be reported to Council for consideration before they are included as a staff submission. These include: <ul style="list-style-type: none"> HH 73 - Hutcheson's Ōamaru Quarry and Kiln Site HH 88 - Hedges Fellmongery HH 123 - Wharekuri Village ruins HH 155 - Shrimski Street Quarry Site HH 161 – Martin’s Ōamaru Lime Kiln and Quarry (Former)

			<ul style="list-style-type: none"> ○ HH 172 - McDonald's Totara Lime Works Site
Historic Heritage	<ul style="list-style-type: none"> • Change the term '<i>exceptional</i>' used to describe Category A heritage items to '<i>outstanding</i>'. 	<ul style="list-style-type: none"> • Amend the term used in the plan to describe Category A items to align with terminology used elsewhere in the PDP 	<ul style="list-style-type: none"> • Officer recommendation to use the term '<i>outstanding</i>' (rather than '<i>exceptional</i>') for Category A heritage items to provide consistency with wording used elsewhere in the PDP and in line with regional policy statements. • This would not change the ranking of any heritage items, only the language used to describe those currently identified as Category A Items (Exceptional Significance). This would require changes to HH-P2, SPZMM-P2 and the descriptions of Category A items contained in Schedule 2 of the PDP.
Historic Heritage	<ul style="list-style-type: none"> • HH(ŌHA)-R8 rule title to be amended to '<i>Heritage restoration to the exterior of character contributing buildings listed in SCHED3...</i>' 	<ul style="list-style-type: none"> • This amendment will provide clarification on the intent and scope of when the rule is to be applied. 	<ul style="list-style-type: none"> • Officer recommendation to provide clarification on the intent and scope of when the rule is to be applied to the <u>exterior</u> of a building only (and not any interior restoration).
Historic Heritage	<ul style="list-style-type: none"> • Re-insertion of HH 111 Doctor's House Kurow as a Category A item 	<ul style="list-style-type: none"> • A peer review of this heritage item has found the item qualifies as a Category A heritage item. • The item was originally listed as a Category B heritage item and subject to landowner requested withdrawal from the schedule. 	<ul style="list-style-type: none"> • A peer review by an external heritage consultant has recommended that this property qualifies as a Category A heritage item and as such, it is recommended that this property is reintroduced into Schedule 2 of the PDP. • The landowners will be directly notified of this staff submission point so that they will have the opportunity to make a further

			submission on the inclusion of this property.
Historic Heritage	<ul style="list-style-type: none"> Re-insertion of HH 223 Shag Point Miners Cob Cottage as a Category A item 	<ul style="list-style-type: none"> A peer review of this heritage item has found the item qualifies as a Category A. The item was originally listed as a Category B and subject to landowner requested withdrawal from the schedule. 	<ul style="list-style-type: none"> A peer review by an external heritage consultant has recommended that this property qualifies as a Category A heritage item and as such, it is recommended that this property is reintroduced into Schedule 2 of the PDP. The landowners will be directly notified of this staff submission point so that they will have the opportunity to make a further submission on the inclusion of this property.
Historic Heritage	<ul style="list-style-type: none"> Additional mapping for HH 87 Ōamaru Borough Water Race 	<ul style="list-style-type: none"> A peer review of this heritage item has identified a 3km gap in the mapping that should be added in to the listing to protect the entirety of this heritage resource. 	<ul style="list-style-type: none"> Advice from Council's external heritage consultant has advised that there is a 3km length of pipeline from the Ōamaru reservoir down to the Ōamaru Powerhouse (HH 68) that should be added to the listing for HH 87 Ōamaru Borough Water Race. An external archaeologist will be engaged to provide further advice on this and will be reported to Council for consideration before it is included as a staff submission.
Historic Heritage	<ul style="list-style-type: none"> Refinement (reduction) in the setting of HH 175 Teschemakers Complex 	<ul style="list-style-type: none"> A peer review of this heritage item has recommended the extent of the setting can be reduced. 	<ul style="list-style-type: none"> A peer review by an external heritage consultant has recommended that the setting of this heritage item could be further reduced from what is currently mapped in the PDP. A revised setting is currently being assessed by a heritage consultant

			and will be reported to Council for consideration before it is included as a staff submission.
Historic Heritage	<ul style="list-style-type: none"> Refinement (reduction) in the setting of HH 240 Palmerston WWI Memorial Arch 	<ul style="list-style-type: none"> A peer review of this heritage item has recommended the extent of the setting can be reduced. 	<ul style="list-style-type: none"> A peer review by an external heritage consultant has recommended that the setting of this heritage item could be further reduced from what is currently mapped in the PDP. A revised setting is currently being assessed by a heritage consultant and will be reported to Council for consideration before it is included as a staff submission
Historic Heritage	<ul style="list-style-type: none"> Refinement (reduction) in the setting of HH 166 Totara Estate Complex 	<ul style="list-style-type: none"> A peer review of this heritage item has recommended the extent of the setting can be reduced. 	<ul style="list-style-type: none"> A peer review by an external heritage consultant has recommended that the setting of this heritage item could be further reduced from what is currently mapped in the PDP. A revised setting is currently being assessed by a heritage consultant and will be reported to Council for consideration before it is included as a staff submission
Notable Trees	<ul style="list-style-type: none"> New tree to be mapped for TREE 040 World War I Memorial Oaks 	<ul style="list-style-type: none"> New memorial tree planted along Kakanui Valley Road in memory of a First World War soldier Rifleman Lender Heydon To be added to mapping for TREE 040 World War I Memorial Oaks 	<ul style="list-style-type: none"> A new memorial tree has been planted along Kakanui Valley Road in memory of a First World War soldier - Rifleman Lender Heydon This tree needs to be added to the group mapping for TREE 040 World War I Memorial Oaks.
Natural Features and Landscapes	<ul style="list-style-type: none"> Change of terminology in NFL Matters of Discretion -reference from 'dry grassland character' to 'vegetation character'. 	<ul style="list-style-type: none"> The reference to dry grassland character may not apply to all areas of ONL/ONF/SNF.RSL. A broader term is more relevant. 	<ul style="list-style-type: none"> A number of rules in the NFL chapter make reference to <i>'the extent to which the proposal will detract from the...dry grassland character...'</i>, as a matter of

			<p>discretion for restricted discretionary activities.</p> <ul style="list-style-type: none"> Officers recommend that this terminology is amended to 'vegetation character' to address those areas of ONL, ONF, SNF, RSL that are not within a dry grassland area.
Subdivision	<ul style="list-style-type: none"> SUB-P12 – Subdivision design. Amend Clause 11 as follows: <i>provide sufficient separation from zone boundaries and transport networks to minimise the potential for any sensitivity effects and/or conflict with existing and permitted activities on adjoining sites; and</i> 	<ul style="list-style-type: none"> Amend wording to add a semi-colon and an and to SUB-P12 Clause 11 rather than a full stop for grammatical consistency with the rest of the Chapter. 	<ul style="list-style-type: none"> Officers recommend correcting the grammar in SUB-P12(11) to improve clarity and consistency.
Temporary Activities	<ul style="list-style-type: none"> Remove the word 'light' from 'light aircraft' in TEMP-R6 so the rule applies to 'Temporary helicopter and light aircraft take-offs and landings, excluding Ōamaru Airport and Ōmārama Airfield' 	<ul style="list-style-type: none"> The term 'light aircraft' is currently undefined in the PDP and requires clarity in the application of TEMP-R6. 	<ul style="list-style-type: none"> Officer recommendation to remove the word 'light' from the rule – the rule would then apply to 'aircraft' which is already a defined term in plan. This would apply to the rule title and PER-5 of the rule.
General Residential Zone	<ul style="list-style-type: none"> Corrective rezoning to align with the Ōamaru, Weston and Kakanui Spatial Plan: 12- 27 Chelmer Street, Ōamaru. 	<ul style="list-style-type: none"> Rezone of 12-27 Chelmer Street from General Residential Zone (GRZ) to Light Industrial Zone (LIZ) to align with existing uses and the Spatial Plan identification of this area as an industrial/employment area. 	<ul style="list-style-type: none"> Officers recommend that the area comprising of 12-27 Chelmer Street, Ōamaru is rezoned from General Residential Zone (GRZ) to a Light Industrial Zone (LIZ) as this is more reflective of the existing uses and will align with the Spatial Plan identification of this area as an industrial/employment area.
Town Centre Zone	<ul style="list-style-type: none"> Deletion of TCZ-R1 (PER-2) 'The building must adjoin the road boundary'. 	<ul style="list-style-type: none"> Unintended consequences to provide a permissive pathway for external alterations and additions along a road boundary where they have the potential to generate greater adverse visual effects than for a building to the rear of a site. 	<ul style="list-style-type: none"> Officers recommend that clause TCZ-R1 (PER-2) 'The building must adjoin the road boundary' is deleted from the rule. The application of the rule as it currently stands provides a permissive pathway for external alterations and additions to existing buildings that adjoin a

			<p>road boundary, and where they meet the listed standards, as a permitted activity. Whereas a building located to the rear of a site would be subjected to a discretionary consent pathway. Any visual effects of alterations/additions to a rear site building are likely to be less than that of a building that adjoins a road boundary.</p> <ul style="list-style-type: none"> It is recommended that this rule is amended to remove PER-2 so that any building alterations/additions within the TCZ are provided for as permitted activities where these can meet the standards identified in TCZ-R1(PER-1).
General Rural Zone	<ul style="list-style-type: none"> Add in a user note to clarify that rule ECO-R1 (Indigenous vegetation clearance outside of a Significant Natural Area) may apply to activities within the General Rural Zone (GRUZ) 	<ul style="list-style-type: none"> ECO-R1 (Indigenous vegetation clearance outside of a Significant Natural Area) applies to sites that are outside of mapped SNA. A user note in the GRUZ introduction would provide increased clarity and cross-referencing. 	<ul style="list-style-type: none"> Officers recommend that a new user note in the General Rural Zone introduction is included to highlight that ECO-R1 <u>may</u> apply to activities involving vegetation clearance in the GRUZ where these are not within an SNA. This will help to clarify the application of this rule.
Natural Features and Landscapes	<ul style="list-style-type: none"> Reword the and/or clauses in NFL-R2 so that the rule and trigger for RDIS aligns to the rule framework 	<p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1</p> <ul style="list-style-type: none"> The structure is underground; or <p>PER-2</p> <ul style="list-style-type: none"> The building or structure is in a Rural Scenic Landscape (except where it is also located on a Significant Natural Feature); and 	<p>Activity status when compliance is not achieved: Restricted Discretionary</p> <p>Where:</p> <ul style="list-style-type: none"> RDIS-1 Compliance is not achieved with PER-1, <u>or</u> PER-2, PER-3 <u>and</u> PER-4

		<p>PER-3</p> <ul style="list-style-type: none">• The building or structure complies with NFL-S1 Standards for colours of buildings and structures in landscapes; and <p>PER-4</p> <ul style="list-style-type: none">• The maximum height above ground level of residential units and buildings and structures that are not farm buildings is 6m.	
--	--	--	--

4 MEETING CLOSE