

8 July 2024

Hearings Panel
Proposed Gore District Plan

By Email: lcrazywolf@goredc.govt.nz

Dear Commissioners

**RE: Submitter 145 Rural Contractors New Zealand Incorporated - Proposed Gore District Plan
General Rural Zone Hearing**

Rural Contractors New Zealand Incorporated ("RCNZ") lodged submissions in relation to the Proposed Gore District Plan.

RCNZ's submission was generally supportive of retaining Objectives GRUZ-01, GRUZ-03 and GRUZ-PREC13-01, and Policies GRUZ-P2 and GRUZ-P11 on the basis that they appropriately recognise the importance of providing for and enabling "rural industry" within the General Rural Zone (being an integral part of primary production). RCNZ is not opposed to any of the Section 42A Report recommended changes to these Objectives and Policies.

RCNZ was supportive of the permitted activity status of "rural industry"¹ under Rule GRUZ-R4 but was concerned that the performance standards were unreasonably restrictive for even a small-scale rural contractor depot. Relatively large buildings are required for secure indoor storage of rural contracting machinery and equipment, and for any on-site servicing and maintenance workshops. In addition, there needs to be sufficient space for associated internal access, parking and manoeuvring areas etc. RCNZ was concerned that a restricted discretionary activity resource consent would typically be required for any rural contractor depot (regardless of scale) under Rule GRUZ-R4 given the large machinery and associated buildings utilised.

¹ As noted in RCNZ's submission, a rural contractor depot would fall within the ambit of the Proposed District Plan definition of "rural industry" (which is the same as the National Planning Standards definition) being "an industry or business undertaken in a rural environment that directly supports, services, or is dependent on primary production".

Accordingly, consistent with other District Plans, RCNZ sought the following new permitted activity rule in the General Rural Zone specific to “rural contractor depots”² (with a consequential amendment to Rules GRUZ-R4 and GRUZ-R8 so they do not apply to rural contractor depots):

GRUZ-R4A - Rural Contractor Depot

All areas

Activity status: Permitted

Where:

1. Any new building, structure and activity complies with standards GRUZ-S2, GRUZ-S7 and GRUZ-S8.
2. The rural contractor depot (including associated vehicle access, parking and manoeuvring areas) is set back at least 50m from any side or rear boundary.
3. The rural contractor depot (including associated parking and manoeuvring areas) is set back at least 10m from any road boundary.
4. The activity has no customers coming to site;
5. There are a maximum of 12 staff working on site at any time.
6. Any building must not exceed 3000m².

Activity status where compliance is not achieved with:

GRUZ-R4A(1) to GRUZ-R4A(6): Restricted Discretionary

Matters of discretion:

1. Location and scale of the activity.
2. The effects on rural character and amenity values of the surrounding environment.
3. Any potential reverse sensitivity effects and/or conflict with existing activities, and the ability to mitigate these effects.
4. Services.
5. Safety and suitability of access and effects on the transport network from additional traffic generation.
6. The matters of discretion of any infringed standard.

Notwithstanding the proposed new permitted activity rule, RCNZ also considered GRUZ-R4 was unreasonably restrictive for other “rural industry” activities so sought a number of amendments to the performance standards to provide greater flexibility.

The Section 42A Report does not support RCNZ’s proposed permitted activity rule for small-scale rural contractor depots for the following reasons:

I consider the definition for ‘rural industry’ readily encompasses ‘rural contractor depots’. A ‘rural contractor depot’ falls into the definition of ‘rural industry’ which means an industry or business undertaken in a rural environment that directly supports, services, or is dependent on primary production. I do not consider there is enough reasoning or information in the submission to support a new activity definition and subsequent rule. Section 6.8.27 assesses the submission points relating to the activity rules which contains recommendations to ensure ‘rural contractor depots’ are provided for in the provisions. On this basis, I recommend the submission and further submission is rejected....

² To assist with implementation of the proposed new permitted activity rule, RCNZ also sought the following definition for “rural contractor depot”: “The land and buildings used for the purposes of storing or maintaining machinery, equipment and associated goods and supplies associated with a rural contracting business that directly supports, services or is dependent on primary production.”.

...I consider amendments can be made to GRUZ-R4 which will enable rural contractor depots of a certain scale, aligning to a degree with the relief sought by the submitters.

Consistent with the above comments, and in response to the submissions of RCNZ and other submitters, the Section 42A Report recommends making the following amendments to the permitted performance standards of Rule GRUZ-R4 (Rural Industry):

Rural Industry

Activity status: Permitted

Where:

1. *Any new building, structure and activity complies with standards ~~GRUZ-S2, GRUZ-S3, GRUZ-S4, GRUZ-S5, GRUZ-S6, GRUZ-S7 and GRUZ-S8.~~*
2. *There are no more than 20 customers coming to site on any day.*
3. *The activity is set back ~~50~~100m from any side or rear boundary and screened as follows:*
Either:
 - i. *planting and/or landscaping to a minimum depth of 2 metres with species that will grow to at least 2m in height; or*
 - ii. *mounding which has a maximum height of 2.5m and a minimum horizontal to vertical ratio of 2:1.*
4. *The ~~activity~~Any building or structure is setback at least 10m from any road boundary.*
5. *There are a maximum of 12 staff working on-site at any point in time.*
6. *The activity is over an area no greater than ~~15000~~1000m².*
7. *The total building coverage for the activity shall be no more than 1000m².*

RCNZ supports the Section 42A Report recommended changes to the performance standards in Rule GRUZ-R4 (Rural Industry) because they provide sufficient flexibility for a small-scale rural contractor depot. In this regard, RCNZ agrees that the proposed permitted activity rule for rural contractor depots is not required.

Overall, RCNZ wishes to table support for the relevant Section 42A Report recommendations in relation to their submissions on the General Rural Zone provisions of the Proposed Gore District Plan, and will not be filing any evidence.

Should there be any queries raised in relation to these matters, please contact me via the details provided below.

Yours sincerely



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