

BEFORE THE

Gore District Council

IN THE MATTER OF

Resource Management
Act 1991

AND

IN THE MATTER OF

Submissions and Further
Submissions on the
Proposed Gore District
Plan

Hearing Stream 5

**STATEMENT OF EVIDENCE OF RACHEL SHALINI THOMAS AND
BERNADETTE ELLEN HUNT ON BEHALF OF THE SOUTHLAND PROVINCE OF
FEDERATED FARMERS OF
NEW ZEALAND**

Dated 2 September 2024

Introduction

Qualifications and Experience

1. My name is Rachel Shalini Thomas. I hold a Bachelor of Arts(hons) in Political Science from Otago University and a Masters in Public Policy from Victoria University. My views are closely aligned with those of Federated Farmers, due to my personal farming background. Further elaboration on my qualifications and experience is provided in the evidence submitted for Hearing Stream 1.
2. Bernadette Ellen Hunt is a member of the Southland Province Executive for Federated Farmers and was first elected to the Southland Provincial Executive in 2015. Bernadette was previously the Senior Vice President of the Executive and has participated in a variety of Resource Management Act (RMA) and local government planning processes including various plan reviews. Further elaboration on Bernadette's qualifications and experience is provided in the evidence submitted for Hearing Stream 1.
3. Federated Farmers is a voluntary membership-based organisation that represents farmers and other rural businesses. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand's farmers and as such has a keen interest in the Gore District Plan.

LIGHT

Interpretation

Artificial Outdoor Lighting

4. Federated Farmers requested an amendment to the definition of 'artificial outdoor lighting' to ensure that greater clarity was provided for plan users. Specifically, we requested that it be clarified that 'electrically-powered' be included to ensure that bonfires and other similar light sources are not captured.
5. In paragraph 46 of the s42A Report, the author provides the dictionary definition of 'artificial' as something 'made by people' often to copy something natural. The author notes that bonfires would not be considered artificial, however a bonfire is made by

people and could be considered to be a copy of a larger fire. It is our view that bonfires would be captured under the proposed definition of 'artificial outdoor lighting'.

6. Bonfires may be used on farm for various reasons. For example, a farmer may start a burnpile (a controlled burn used to dispose of debris and rubbish). There may also be bonfires for cultural/celebratory reasons. If it is not the intention to capture these then the Plan may benefit from excluding bonfires from the definition of artificial outdoor lighting.
7. 'Artificial outdoor lighting' appears in the pDP ten times, in relation to the LIGHT chapter. The purpose of its inclusion in the plan does not appear to be to regulate bonfires. LIGHT-R1 in the pDP provides permitted activity status in all zones for the emission of *artificial outdoor light* where (among other conditions) lighting is 'directed downward and shielded from above to ensure that all light shines below the horizontal'. It is therefore clear that the intention is not to include a bonfire in the definition of artificial outdoor lighting as it would not be possible to dictate the direction of light from a bonfire.
8. We maintain that our preferred relief is to amend the definition as per our original submission (S126.08):

any electrically-powered exterior or ~~non-residential interior~~ lighting and/or sign that emits directly into the outdoor environment, ~~and includes signs.~~

Additional policy

9. Federated Farmers (S126.130) requested the inclusion of an additional policy that recognises and enables certain rural and primary production activities which may require artificial outdoor lighting outside of normal working hours under certain conditions. This was rejected by the s 42A Author who notes that LIGHT-P1 would include rural/primary production activities (paragraph 62).

10. We accept this recommendation, however, it is important to ensure that the plan does not unnecessarily restrict rural/primary production activities (such as a burnpile) as per our earlier comments (paragraphs 4-8).

Overview

11. Our submission (S126.126) recommended acknowledgement of rural production as enabled by artificial outdoor lighting. This is rejected by the s42A Author on the grounds that it would make the sentence unnecessarily lengthy without any real benefit. We accept this recommendation.

LIGHT-O1

12. We thank the s42A Author for retaining LIGHT-O1 as drafted and reaffirm our support for this objective.

LIGHT-O2

13. Federated Farmers requested an amendment to LIGHT-O2 to specify identifying the enablement of rural production. The s42A Author rejects this on the grounds that it is unnecessary to specify rural production as an activity. We accept this recommendation.

SIGNS

Interpretation

Signs

14. We supported the definition of 'signs' which aligns with the National Planning Standards. We agree with the s42A Report Author that this definition be retained.

Overview

15. The s42A Report accepts our recommendation to amend the overview section, providing for signage to identify businesses, products and services as opposed to just advertising. We accept this amendment and thank the s42A Report Author.

SIGN-S4

16. We thank the s42A Report Author for attempting to address our concern that one sign per site (as proposed in SIGN-S4) is overly restrictive for a farm where multiple signs

are required to meet health and safety and operational requirements. However, we believe that further amendments are still required to SIGN-S4 to ensure that some signage on farms does not unintentionally trigger consent.

17. The s42A Report Author states in paragraph 140 that 5 signs per site could result in visual clutter in an area of the district which should be relatively free of signage. While there may be a visual concern, there is also a requirement to ensure the health and safety of farm businesses and their staff. This is one of the purposes of farm signage.
18. In any day a farm can have multiple visitors (staff, contractors, neighbouring farmers, audit inspectors, farm advisors, milk tankers, etc) who rely on signage not only for direction or identification, but also for information regarding the farm.
19. The proposed wording for SIGN-S4 in the s42A Report, in our view, unnecessarily limits the type of signage which may be erected without consent. The proposed addition to SIGN-S4 is:

except where signs are for the purpose of providing direction or identification and are either:

(a) not visible from a public place; or

(b) the maximum sign face is no greater than 0.25m²

the maximum number of signs per site is five.

20. Examples of signage required for farms are included in Appendix. 1 Many of these are for purposes outside of providing direction or identification, and include:
 - Health and safety (multiple signage may be required)
 - Emergency meeting point
 - Caution
 - Contact information
 - Requirements for safety gear
 - Requirements to watch for tractor vehicles
 - Chemical storage

- Diesel/petrol storage
- Stock crossing
- No/restricted access
- Private property
- Security camera signage
- Dairy supply number
- Staff contact information
- Property name/information
- Rapid number
- Fire safety signage
- Biosecurity/pest management signage

21. Many of these signage types could be located in areas visible from a road, depending on the location of the farmyard or farm entrance where many of the signs are required. Furthermore, the standard applies per 'site' (as defined in the National Planning Standards and utilised in the PDP). A site for a farm could be quite large and comprise of multiple access points and businesses (i.e. a seed cleaning business on a working farm). Hence there is a need to permit signs without restrictive conditions.

22. We suggest an amendment to the wording proposed in paragraph 144 of the s42A Report as follow:

except where signs are for the purpose of supporting primary production, -and/or providing direction or identification and are either:

(a) not visible from a public place; or

(b) the maximum sign face is no greater than 0.25m²

the maximum number of signs per site is five, or where multiple businesses exist on one site the maximum number of signs is eight.

Temporary Activities

TEMP-R3

23. Federated Farmers requested that TEMP-R3 was amended to include cover storage, or stacking of goods for farming purposes. The s42A Author agrees that storage

activities should be permitted (as provided for under GRUZ-R1), however suggests an amendment to clarify this. The amendment supports the relief sought in our submission and we accept the recommendation.

Transport

Interpretation

Collector Road – new definition requested

24. Federated Farmers (S126.012) requested a new definition was included for ‘collector road’. This request is rejected from the s42A Author on the basis that the One Network Road Classification (ONRC) hierarchy has been superseded by the One Network Framework (ONF) street categories.
25. We accept this recommendation, however, it is noted that ‘collector roads’ are still recommended to be included in TABLE-S6 (paragraph 199). We question if the intention is for these to be ‘connector roads’ as referred to in the ONF¹ and if so an update may be required.

Vehicle movements – new definition requested

26. Federated Farmers (S126.050) requested a new definition was included for ‘vehicle movements’. The s42A Author has recommended that the definition be included to refer to the existing pDP definition of movement. We accept this recommendation.

Land Transport Infrastructure

27. The definition for Land Transport Infrastructure was supported in part, however we requested an amendment (S126.030) to remove reference to stormwater management facilities, ventilation structures, drainage devices and erosion control devices. We thank the s42A Report Author for accepting our submission on this point and agree with the recommendation to remove clause (m).

TRANS-S3

28. Federated Farmers recommended the amendment of TRANS-S3 to specify that it should not apply to vehicle movements (S126.062). The s42A Report Author

¹NZTA (2022). Street categories. Available at: [One Network Framework street categories \(nzta.govt.nz\)](https://nzta.govt.nz/one-network-framework/street-categories)

recommends TRANS-S3 is deleted and we agree with this recommendation and thank the Author for this change.

Conclusion

Federated Farmers thanks the Hearing Panel for the opportunity to present this evidence statement.



Bernadette Hunt
Executive Member
Southland Province Federated
Farmers of NZ



Rachel Thomas
Senior Policy Advisor
Federated Farmers of NZ

Appendix 1 – examples of on-farm signage

Signage may vary in size and be visible from a public place (road) depending on farm entrance and yard location.

