

PROPOSED GORE DISTRICT PLAN SECTION 32 REPORT

FIELD DAYS AND CAMP COLUMBA ZONES



Section 32 Evaluation – Field Days & Camp Columba (Special Purpose Zones)

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Glossary of Terms

Resource Management Act 1991	RMA or ‘the Act’
Gore District Council	GDC or ‘the Council’
Operative District Plan	ODP
Proposed District Plan	PDP
Southland Regional Policy Statement	RPS
National Planning Standards 2019	PS
Southland Regional Policy Statement 2017	RPS
National Policy Statements	NPS
National Policy Statement on Freshwater	NPS-FW
National Environmental Standards	NES
National Environmental Standard on Freshwater	NES-FW
Permitted Activity	PA
Controlled Activity	CA
Restricted Discretionary Activity	RDA
Discretionary Activity	DA
Non-complying Activity	NCA
Southland District Plan	SDP
Clutha District Plan	CDP
Proposed Timaru District Plan	PTDP
Proposed Selwyn District Plan	PSDP
Proposed New Plymouth District Plan	PNPDP

1. Executive Summary

Section 32 of the Resource Management Act 1991 ('the Act' or 'the RMA') requires objectives in plan change proposals to be examined for their appropriateness in achieving the purpose of the Act and the policies and methods of those proposals to be examined for their costs, benefits, efficiency, effectiveness and risk in achieving the objectives. The analysis set out in this report is to fulfil the obligations of the Council under s32 of the Act.

The Gore District contains two facilities which contribute to the economic and social wellbeing of the district and regional community. These facilities are known as Camp Columba and the Field Days site. The sites are zoned Rural under the Operative District Plan (ODP) and either operated under existing use rights or an approved resource consent.

This section 32 evaluation report relates to the evaluation of options for the management of Camp Columba and Fields Days sites in the Gore District Plan.

The objectives, policies, rules and standards for managing the sites are located within Part 3 – Area Specific Matters as a Special Purpose Zone, consistent with the National Planning Standards.

2. Overview and Purpose

2.1 Introduction to the resource management issue(s)

The Gore District contains two facilities which contribute to the economic and social wellbeing of the district and regional community. These facilities are known as Camp Columba and the Field Days site.

Camp Columba

Camp Columba offers camps and programmes focussed on outdoor education and adventure activities. The camps include overnight accommodation and cater for groups including youth groups, Scouting New Zealand, the Health Foundation, church groups and sports teams. In the future, the camp seeks to engage with other family groups, secondary schools and adult groups. The camp was first established in 1957 by the Maitua District Bible Class Committee to hold Easter and Labour Weekend Camps for young people from across the region. The camp has since expanded and now services approximately 40% of schools in the wider Southland / Otago region. The purpose of the Camp Columba Zone is to enable the existing activity to continue to operate and expand.

Field Days

The Fields Day Zone incorporates land at Waimumu used for the biennial field days event since 1982. These three-day events are the second largest of their type in the country, and are nationally significant, attracting over 40,000 visitors, predominantly from throughout the South Island.

The infrastructure and resources developed at the site enables a wide range of sporting, community, social, cultural and corporate events and exhibitions to take place between field day events, including concerts and conferences. Parts of the site when not being used for events are subject to agricultural activities, predominantly grazing by stock.

The Special Purpose Zones provides a regulatory framework for activities currently occurring at the sites and to control associated effects. The provisions seek to manage the following issues:

Issue 1 Recognition of the unique nature of these sites or provide for the land use activities occurring there.

Issue 2 Recognition of the value of the Field Days site as an asset to the Gore District and a means of attracting visitors to the district.

Issue 3 Recognition of Camp Columba as an important regional asset serving the community and in particular young people and their whānau by providing outdoor education and adventure activities.

Issue 4 Provision for the future expansion of Camp Columba within the parameters of the structure plan to ensure.

Issue 5 The activities undertaken as part of Field Days and Camp Columba have the potential to generated adverse effects on the environment and the wider community.

2.2 Purpose of the report

The purpose of this report is to provide an evaluation of the proposed provisions in accordance with the requirements of Section 32 of the RMA 1991.

The Proposed District Plan (PDP) includes Area Specific Chapters relating to Special Purpose Zones, consistent with the requirements of the National Planning Standards. It contains objectives, policies, rules, and standards to make provision for the activities currently occurring at these sites, while managing the potential adverse effects on character and amenity, heritage values and transport safety.

This report assesses the appropriateness of the proposed Objectives to achieve the purpose of the Act and the effectiveness and efficiency of the policies, rules and standards which give effect to the Objectives. This report also provides information on the issues the provisions seek to address and an evaluation of the provisions relating to the Special Purpose Zones within the ODP.

The sites are not provided for as Special Purposes Zones under the ODP and either operated under existing use rights or an approved resource consent.

An assessment of the scale and significance of the provisions will inform the level of detail included in this report.

3. Statutory and Policy Context

3.1 Resource Management Act

In carrying out a s32 analysis, an evaluation is required of how the proposal achieves the purpose and principles contained in Part 2 of the RMA.

Section 5 sets out the purpose of the RMA, which is to promote the sustainable management of natural and physical resources.

Sustainable management means *managing the use, development, and protection of natural and physical resources to enable people and communities to provide for their social, economic and cultural wellbeing and for their health and safety, while –*

- (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

In achieving this purpose, authorities also need to recognise and provide for the matters of national importance identified in s6, have particular regard to other matters referred to in s7 and take into account the principles of the Treaty of Waitangi referred to in s8.

Section 7

The only section 6 matter relevant to this policy is:

- (e) the relationship of Māori with their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga.*

The zone provisions include requirements for stream setbacks to ensure water quality is protected, amongst other matters. The Camp Columba provisions also seek, through policies to promote the camp as a dark sky area. This aligns with the aspirations expressed in 'Te Tangi a Tauria – The Cry of the People' the Ngai Tahu Ki Murihiku Natural Resource and Environmental Management Plan which includes policies that seek to address the effects of light pollution on dark skies.

Section 7

The section 7 matters that are relevant to this topic are:

- (b) the efficient use and development of natural and physical resources:*
- (c) the maintenance and enhancement of amenity values:*
- (f) maintenance and enhancement of the quality of the environment:*

In relation to Section 7(b), the special purpose zones are located on land previously zoned rural and therefore have the potential to affect the efficient use of productive land, and the nature of the activities have the potential to affect the efficient use of the transport network being a physical resource.

In relation to Sections 7(c) and 7(f), the proposed special purpose zones can have positive or adverse effects on amenity values given the activities undertaken there may generate noise, lightspill and traffic. The activities may also impact on the quality of the environment, especially given the rural character of the surrounding land.

Section 8 of the RMA requires the Council to take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi). Tangata whenua, through the Hokonui Runanga, have partnered with the Council in the preparation of the proposed District Plan.

Section 31 is relevant insofar as it requires the Council to establish, implement and review a District Plan which contains objectives, policies and methods to achieve a range of purposes as listed above. This report considers the appropriateness of the new objectives within the proposed District Plan (PDP) to achieve the purpose of the Act. The review of the Operative District Plan and the establishment of a new District Plan allows Council to give effect to Section 31.

3.2 National Policy Statements

The Section 32 - Overview and Urban Form and Development Evaluation Report includes details and a brief assessment of all National Policy Statements (NPS). The following NPS are relevant to the topic:

NPS for Freshwater Management 2020

The objective of the National Policy Statement for Freshwater Management 2020 (NPS-FM) is to prioritise the management of freshwater bodies and ecosystems to ensure the maintenance or improvement of freshwater. The NPS-FM outlines 15 policies in which to manage this objective.

Overall, this national direction requires local authorities to give effect to these objectives and policies, in particular local authorities must involve tangata whenua in the management of freshwater and adopt an integrated approach to catchment management.

The National Policy Statement for Freshwater Management and Stock exclusion regulations seek to:

- improve degraded water bodies, and maintain or improve all others using defined bottom lines,
- avoid any further loss or degradation of wetlands and streams, map existing wetlands and encourage their restoration,
- restrict stock access and other activities locating proximate to streams.

There are a number of rivers, streams and wetlands in the district.

The NES-FM is administered by the regional council, however there cannot be a District Plan rule that is more enabling than certain NES-FM rules. Both sites have streams located within the site area and activities must therefore be undertaken having regard to the NPS-FW.

NPS for Highly Productive Soils 2022

The National Policy Statement on Highly Productive Land (NPS-HPL) became operative on 17 October 2022. The NPS-HPL seeks to ensure that the most favourable soils for food and fibre production are protected now and for future generations.

The issues the draft NPS-HPS seeks to address are:

- Urban land expanding on to New Zealand's most productive land
- The creation of rural lifestyle properties is reducing the availability of highly productive land, and
- Reverse sensitivity – when new land uses conflict with existing uses

Environment Southland is required to map highly productive land within the Gore district that meets the following criteria:

- (a) is in a general rural zone or rural production zone; and*
- (b) is predominantly LUC 1, 2, or 3 land; and*
- (c) forms a large and geographically cohesive area.*

The NPS-HPL defines highly productive land as land mapped by Regional Councils, or in absence of that, in the interim, highly productive land is a land parcel defined as Land Use Capability (LUC) 1, 2 and 3 as mapped by the New Zealand Land Resource Inventory (NZLRI). Based on NZLRI maps, an area of the Field Days site includes land identified as land use capability 3. The entirety of the Camp Columba site is located on land identified as land use capability 3.

3.3 National Environmental Standards

The Section 32 - Overview and Urban Form and Development Evaluation Report includes details and a brief assessment of all National Environmental Standards (NES). The following NES are relevant:

NES for Freshwater 2020

The National Environmental Standard for freshwater came into effect September 2020 with two amendments relating to synthetic fertiliser and winter grazing in 2021 and 2022. This NES regulates activities that pose risks to the health of freshwater and freshwater ecosystems and sets standards designed to protect freshwater resources.

National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (NES-CS)

The NES-CS seeks to identify and manage contaminants in soil to protect human health. The NES-CS regulates change of land use, earthworks, fuel tank removal and subdivision of areas identified on the hazardous industries and activities list (HAIL).

In rural areas, there can HAIL sites due to the likes of pesticide spraying, sheep dips, and other activities that uses contaminants.

The NES-CS does not regulate what a district plan can and cannot cover but acts as an additional level of regulation specific to managing the issue of contaminants in soil and the potential effects on human health.

3.4 National Planning Standards

The National Planning Standards (PS) 2019 requires a more bespoke approach to planning zones than the ODP. This includes a clearer centre hierarchy, rural settlement zones, and a wider range of residential, industrial and rural zones. The NPS also provides the structure and form for the Plan content along with definitions and mapping criteria.

The following aspects of the National Planning Standards are relevant:

An additional **special purpose zone** must only be created when the proposed land use activities or anticipated outcomes of the additional zone meet all of the following criteria:

- a. are significant to the district, region or country
- b. are impractical to be managed through another zone
- c. are impractical to be managed through a combination of spatial layers.

Field Days and Camp Columba are considered appropriate as a special zone because they are significant to the district as they provide facilities and resources which meet a specific local and regional function / purpose.

Both Field Days and Camp Columba are located within the rural environment but would not practically be managed through the General Rural Zone provisions. The provisions relating to Field Days and Camp Columba are different from each other and from the General Rural Zone provisions which focus on productive land uses. To manage the provisions within the General Rural Zone, even with methods such as a precinct or spatial layer, would result in a cumbersome chapter which was not user friendly given the provisions have a different focus to the General Rural Zone purpose.

3.5 Regional Policy Statement

The Southland Regional Policy Statement 2017 (RPS) sets out the framework and priorities for resource management in the region. The RPS identifies the regionally significant issues around the management of the Region's natural and physical resources and sets out what needs to be achieved (objectives) and the way in which the objectives will be achieved (policies and methods). The PDP is required to give effect to the regional policy statement as required by section 75(3) of the RMA.

The RPS contains a chapter on rural land and soils – Chapter 5: Rural Land/Soils – which identifies the following issues for rural areas:

The rural land resource of Southland supports the economic and cultural life of Southlanders and must be safeguarded to provide for current and future generations. To achieve sustainable use of the rural land resource it is important to avoid:

- *degradation or loss of soils through poor management, for example by avoiding heavy stocking of soils vulnerable to structural compaction during wet periods;*

- *soil erosion, sedimentation, landscape impacts, and loss of biodiversity during land development activities.*

To achieve sustainable use of rural land resources, rural-residential subdivision must be undertaken in a way that achieves efficient use of soil and land resources. This means avoiding negative outcomes such as the loss of high value soils from productive use, inefficient use of transport networks, reverse sensitivity effects, or lack of available land following 'ring fencing' of urban areas by small landholdings.

Objective RURAL.1 focuses on maintaining or enhancing productive land capacity and capability by ensuring land use activities are undertaken in a sustainable manner.

Policy RURAL.1 recognises that *"the use and development of Southland's rural land resource enables people and communities to provide for their social, economic and cultural wellbeing."*

Policy RURAL.2 requires that land use and development activities are managed in a way which maintains or enhances rural amenity values and character.

Policy RURAL.5 seeks to ensure that the effects of rural land development is sustainably managed with land management practices that safeguard soil properties and mauri, minimise soil erosion, compaction and disturbance and maintain or enhance indigenous biodiversity.

Although the Field Days and Camp Columba zones and provisions do not wholly align with the RPS objectives and policies in relation to the use of rural land for productive purposes, it should be acknowledged that both sites contain existing activities. The PDP provisions seek to ensure that rural amenity values, within and beyond the sites, are managed so they are maintained and where possible enhanced.

3.6 Regional Plans

Environment Southland has prepared a number of regional plans, these include:

- Regional Air Plan 2016
- Effluent Land Application Plan 1998
- Regional Water Plan 2010

Environment Southland's proposed Southland Water and Land Plan was made partially operative following a council meeting in January 2021.

Environment Southland are currently in the process of combining provisions from the Transitional Regional Plan, Regional Effluent Land Application Plan and Regional Water plan into one document, the proposed Southland Water and Land Plan. This Plan became operative (in part) on 1 March 2021, however, there are some remaining objectives, policies, rules and appendices which are currently in being considered before the Environment Court. The proposed Southland Water and Land Plan contains objectives, policies and rules to address issues around water quality and quantity, soil resources, river and lake beds and indigenous biodiversity.

To date most district plans have relied solely on the Regional Policy Statements (RPS) to provide strategic direction as district plans must give effect to RPS's in accordance with RMA requirements. The provisions of the Southland RPS are summarised within the Section 32 – Overview and Urban Form and Development Evaluation Report.

The following provisions are particularly relevant to rural areas:

- Mauri and wairua are sustained or improved where degraded, and mahinga kai and customary resources are healthy, abundant and accessible to tangata whenua.
- Maintain or improve water quality and ensure flows, levels and allocation regimes safeguard the life supporting capacity of water while meeting user needs.
- Achieve sustainable use of Southland's rural land resource in respect of agriculture and primary sector activities, subdivision use and development, use of soil resources, and on-site wastewater systems.
- Maintain and protect indigenous biodiversity.
- Natural hazard risks are understood and avoided, remedied or mitigated, resulting in communities becoming more resilient.
- Southland's regionally and nationally significant infrastructure and critical infrastructure is secure, operates efficiently, and is appropriately integrated with land use activities and the environment.

3.7 Iwi Environmental Management Plan(s)

'Te Tangi a Taura – The Cry of the People' the Ngai Tahu Ki Murihiku Natural Resource and Environmental Management Plan identifies a broad range of relevant matters when considering where and how Gore grows and develops. In particular, there is a desire to:

- limit the impacts of climate change on indigenous species and ecosystems and the risks of natural hazards by appropriately managing urban development and providing for sustainable energy and transport systems.
- Protect sites of significance and indigenous biodiversity areas along with appropriate management of water
- Limit impacts of industrial activity and subdivision by involving iwi in decision making processes and managing land use, building and water issues
- Providing appropriate infrastructure management

'Te Tāhū o Te Whāriki', the Ngāi Tahu Climate Change Strategy, identifies a need to assess future commercial risks, protect wahi tapu, mahinga kai and other taonga, prepare plans to relocate Marae and Runānga facilities threatened by increasing hazards, as well as influence agencies to develop climate change responses.

3.8 Other Local Policies, Strategies and Plans

Gore Subdivision and Land Development Bylaw 2019

The subdivision and land development bylaw is intended to guide subdivision, land use and development within the district and is based on NZS 4404:2010 with modified content as appropriate to meet local conditions. The guide seeks to ensure that subdivision, land use and development are undertaken in a manner that is environmentally sustainable and technically robust by providing requirements for roading and servicing connections and management as well as landscaping, earthworks and network utilities. The bylaw contains specific standards in relation to vehicle crossings. Any future development at either site would need to be consistent with the provisions of the bylaw or seek a dispensation.

Gore District Council Events Strategy and Action Plan 2021-2024

The Gore District Council (GDC) adopted an Events Strategy in 2021. GDC has been instrumental in attracting, creating, and organising many events in Gore. Over the last 5 years, council has provided resources for the organisation of several key events.

The Events Strategy outlines GDCs role in the organisation of these events, whether it is via funding, organising, promoting or hosting. The Council currently hires 1 full time Events Co-ordinator who is responsible for the delivery of Council run events and supporting the non-council led events.

The Events Strategy highlights how events are important for Gore because they give life to the community and create interest in and reflect the kind of community that Gore is. Gore District Council supports events due to the wide array of social, cultural, and economic benefits that events provide. Events can lead to stronger communities by bringing people together, raising community spirit and pride in local neighbourhoods and the district. Events offer businesses the opportunity to benefit financially and to provide the needed resources as required. The knock-on effect of this is an increased revenue and income for the businesses of Gore and the Gore district. The Events Strategy has been helpful in providing guidance and direction as to how events are to be received in Gore. Mainly, that Gore District Council has a vision to put Gore District on the map as a District that offers 'City Events in a Rural Environment.'

3.9 Climate Change

The effects of climate change have been added to other matters decision makers should have particular regard to (RMAs7(i)).

In accordance with 2020 RMA amendments, by 2022 District Plans will not only need to have regard to the effects of climate change (adaptation) but also climate change mitigation and national adaptation and emission reduction plans prepared under the Climate Change Response Act 2002. A compact urban form with most activities located around good transport connections and that takes account of the changing nature of natural hazards will help achieve these requirements.

The National Adaption Plan released in 2022 contains strategies, policies and actions to assist with adapting to the changing climate and its effects to ensure that the potential harm from climate change is reduced. Further guidance will be provided in relation to Climate change as emission targets and RMA through the reform progresses.

4. Resource Management Issue Analysis

4.1 Background

Section 2.1 of this report identifies 5 resource management issues which the PDP Camp Columba and Field Days Special Purpose zone chapter provisions address.

Field Days Issues

Issue 1 Recognition of the unique nature of these sites or provide for the land use activities occurring there.

Issue 2 Recognition of the value of the Field Days site as an asset to the Gore District and a means of attracting visitors to the district.

Issue 5 The activities undertaken as part of Field Days and Camp Columba have the potential to generated adverse effects on the environment and the wider community.

The Field Days site operates under the single rule (refer to section 4.2) in the ODP and various resource consents. This does not provide for the long-term use and expansion of the activity. The activity is recognised as regionally significant as it provides a purpose-built events venue capable of accommodating a variety of events, some very large. The site provides a valuable resource for the district.

There are two current resource consents which authorise activities undertaken on the site. These consents approve signage and events not related to agriculture. The events have been grouped by purpose and size. Once the quota of a particular type of activity has been reached, further consent is required. For example, only 3 trade exhibition events and 6 private functions are permitted by the resource consent. The consent does not allow sufficient flexibility for the site. Further should additional buildings be required to accommodate events, a variation to the resource consent is required.

Under the ODP resource consent would be required for the expansion or departure from the existing consents as the site is zoned Rural and communal and visitor accommodation activities are not permitted. Providing for the Field Days site through the PDP is an alternative option to provide for ongoing use and expansion of the activity (subject to the standards of the Special Purpose Zone Chapter).

Camp Columba Issues

Issue 3 Recognition of Camp Columba as an important regional asset serving the community and in particular young people and their whānau by providing outdoor education and adventure activities.

Issue 4 Provision for the future expansion of Camp Columba within the parameters of the structure plan to ensure.

Issue 5 The activities undertaken as part of Field Days and Camp Columba have the potential to generated adverse effects on the environment and the wider community.

Whilst Camp Columba currently operates under existing use rights this does not provide for the long-term use and expansion of the activity. The activity is recognised as regionally significant as it provides a strong community function to approximately 40% of schools across the Southland / Otago region and provides a valuable resource for the district.

The Camp has a vision for expansion of activities within their proposed zone area. Under the ODP resource consent would be required for the expansion as the site is zoned Rural and community and visitor accommodation activities are not permitted. Providing for Camp Columba through the PDP is an alternative option compared to relying on resource consent approvals and existing use rights to provide for ongoing use and expansion (in accordance with the structure plan).

4.2 Operative Plan Approach¹

Both the Field Days site and Camp Columba sites are zoned Rural under the Operative District Plan (ODP). Development within the Rural Zone is managed in the Land Use Activities Framework and Rules chapters in the ODP. The ODP recognises the potential for land use activities to adversely affect the character and amenity values which exist in different areas.

The ODP contains several high level objectives and policies which would be relevant to consideration of proposals in the Rural Zone.

Objectives 3.3(1) and (2) seek to ensure:

- the amenity values of the various localities within the district are maintained and enhanced while respecting the different values and characteristics that exist within each area; and
- the effects of land use activities do not adversely affect the quality of the environment and are compatible with the characteristics and amenity values of each locality.

The ODP policies 3.4(1) and 3.4(2) are also of relevance as they require zones which reflect the character and amenity of an area to be established and the adverse effects of land use activities on the environment to be controlled.

The following land use activities are permitted in the Rural Zone:

- Agriculture;
- Animal Boarding Activity;
- Farm Quarry;
- Essential Services;
- Home Occupation;
- Home Stay;
- Land Development;
- Residential Activity on:
 - a site equal to or exceeding 2 hectares in area; or
 - a site of more than 2,000 square metres and less than 2 hectares in area existing, or approved for subdivision, prior to 27 March 2014.
- Roadside Sales Activity;
- Temporary Military Training;
- Veterinary Clinic.

¹ [District Plan - Gore District Council \(goredc.govt.nz\)](https://www.goredc.govt.nz/district-plan/)

Further the temporary activities rules (4.3.1) permit the following at the Field Days site:

- **Agricultural field-days** at the Waimumu Field Day site, Waimumu Road, legally described as Lot 1 DP 14304 Block VIII Waimumu Hundred, Lot 1 DP 14305 Block VIII Waimumu Hundred, Pt Section 4A Waimumu Hundred and Lot 1 DP 3125, Pt Lot 27 DP 82, Pt Lot 26 DP 83, Lots A-D DP 983, Lots 2-3 DP 303955, Lot 1 DP 305267, Sections 89-90 Blocks VII, IX, X, II Waimumu Hundred

Agricultural field days means the passive and active display and sale of products and services associated with the agricultural activities. This includes farm related activities and competitions, and ancillary retail, recreation, education and entertainment.

Noise standards do not apply to any land use activity in connection with the Waimumu Field Day.

The temporary activities rules (4.3.1) do not permit any activities on the Camp Columba site which is not specifically mentioned in the rule or elsewhere in Chapter 4 – Land Use Activities – Rules.

4.3 Effectiveness of Operative Plan

Issue	Comment	Response
The rural zoning does not reflect the activities being undertaken on the Field Days site.	The site has been developed for use as a venue for the biennial Field Days show and therefore the infrastructure exists to hold other events. The District Plan does not enable this and although resource consent has been obtained, every time a change is made on site for instance an additional building or different type of event, a variation or new consent is required.	The special purpose zone will recognise the site as a purpose built venue for a variety of events, not necessarily focused on agriculture. The provisions will enable the events to occur provided the standards are met to ensure adverse effects on the environment and the wider community are avoided, remedied or mitigated. This will reduce the financial cost of obtaining consents.
The rural zoning does not reflect activities being undertaken on the Camp Columba site or allow for the intended future expansion of the activity.	The Camp Columba site is developed and used for this purpose and provides a valuable local and regional resource. The District Plan does not enable the activity which appears to operate under existing use rights, however, future expansion plans (within the site) would require resource consent and may be at odds with the	The Special Purpose Zoning recognises the purpose and function of the activities undertaken on the site and provides for them to continue and expand within the limits of an agreed structure plan. The provisions will provide certainty for the activity which is acknowledged as beneficial to the local and regional community.

	objectives and policies of the rural zone.	
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In general, the ODP approach is not efficient or effective given the land use that has evolved on site. The objectives and policies are relatively generic and relate to amenity. As the expectation in this zone is for rural amenity the presence of events and multiple buildings and infrastructure to support such events is not generally anticipated as part of rural amenity. This can result in a lack of clarity, direction and uncertainty for both plan users and decision makers.

The existing provisions are limited in their coverage of the diversity of events able to be accommodated on site.

The objectives and policies provide only generic guidance for the consenting process. The District Plan policy framework needs to be amended to provide clear directions in managing land use activities in these areas.

4.4 Technical Reports and Research

An Events Audit² was undertaken in 2021 following direction from the District Plan Review Committee. The Proposed District Plan was partially drafted with the inclusion of a Temporary Event rule in the Temporary Activities Chapter but also other area specific chapters. The Committee requested an audit to identify the type, number and duration of events occurring across the district to determine the appropriateness of the drafted district plan provisions.

The events audit concluded the main event on the Field Days site is of course the biennial Southern Field Days. The event runs every two years for three days in February. The last event showcased over 700 exhibitors and saw 40,000 people through the gates. The event follows a Traffic Management Plan and Event Management Plan. The site has an approved resource consent to enable other events to take place on the site subject to conditions relating to roading upgrades, visitor accommodation and traffic management plans.

The audit indicated events range from motor rallies to primary school cross country races to Young Farmers social events and can take place over multiple days. This means the number of people range from a hundred or so up to thousands. The operators are further constructing a Wool Shed to hold smaller scale functions for around 120 people.

The events audit recommended temporary events should be enabled via specific provisions in the Special Purpose zone chapters.

4.5 Analysis of Best Practice

To understand whether the PDP approach to Special Purpose Zones and the proposed provisions are appropriate and consistent with how other Councils are addressing the same issue the following District Plans were reviewed.

² 'Gore District Plan Review Events Audit and Recommendations' The Property Group, November 2021

- Southland District Plan³ (Southland District Council borders Gore District Council to the north, south and east)
- Clutha District Plan⁴ (Clutha District Council borders Gore District Council to the west)
- Proposed New Plymouth District Plan⁵
- Proposed Selwyn District Plan⁶

Southland District Plan 2018 (SDP)

The SDP became operative on 22 January 2018, prior to the National Planning Standards. However, the SDP does contain two zones which can broadly be considered 'special purpose zones':

- Fiordland Rakiura Zone – which includes the Fiordland and Rakiura National Parks and part of the Mt. Aspiring National Park as well as privately owned land adjoining the National Parks. The provisions recognise the Department of Conservation's role and activities and works on land managed under the Conservation Act 1987 whilst also providing different provisions for land outside of the National Parks but which, without specific control, may adversely affect the natural and wilderness qualities of the Zone and outstanding qualities of the National Parks.
- Eweburn Zone – the provisions provide for visitor, residential and recreational facilities balanced with managing the rural amenity and ecological values within the zone based on the outline development plan.

Clutha District Plan 1998 (CDP)

The CDP does not appear to have any Special Purpose Zones.

Proposed New Plymouth District Plan (PNPDP) - decisions notified on 13 May 2023

The PNPDP proposes Special Purpose Zones for the Airport, Hospital, Major Facility, Māori Purpose and Future Urban Zones. These generally align with the Special Purpose Zones provided for through the National Planning Standards. No other Special Purpose Zones are provided and therefore a review of the PNPDP had limited relevance for dealing with more bespoke Special Purpose Zones such as Field Days and Camp Columba.

Proposed Selwyn District Plan (PSDP) - publicly notified on 5 October 2020 with a variation notified on 20 August 2022

The PSDP proposes a Port and Māori Purpose Zones as Special Purpose Zone but also proposes the following more bespoke Special Purpose Zones:

- Dairy Processing Zone – to provide specific provisions for the Synlait Milk Limited and Fonterra Limited dairy processing plants at Dunsandel and Horoata respectively. The provisions reflect the scale and nature of the activities and potential adverse effects

³ [District Plan | Southland District Council \(southlanddc.govt.nz\)](https://southlanddc.govt.nz/district-plan)

⁴ [District Plan - Clutha District Council \(cluthadc.govt.nz\)](https://cluthadc.govt.nz/district-plan)

⁵ [IsoPlan \(selwyn.govt.nz\)](https://selwyn.govt.nz/iso-plan)

⁶ [IsoPlan \(npdc.govt.nz\)](https://npdc.govt.nz/iso-plan)

generated by these activities balanced with the need to enable and protect these activities which are an important infrastructure for the district.

- Grasmere Zone – to provide for an existing tourist development located at the historic Grasmere Lodge, the provisions provide for the existing activities, and for increased activities. The provisions also provide for specific landscape and natural values.
- Knowledge Zone – to provide for tertiary education providers and research institutes located in the town on Lincoln. The provisions recognise the social, economic and cultural benefits these facilities make to the community (regionally and nationally).
- Porters Ski Zone – to provide for the Porters Ski and Recreation Area within the high country area of the district.
- Terrace Down Zone – to provide for an existing tourist development centred around a golf course but including hotel and conference facilities, residential units and condominiums with opportunities for other facilities such as a hunting lodge and sporting & recreational facilities.

These Special Purpose Zones all provide specific provisions for activities which would not be practically managed by the wider zone provisions. The provisions also recognise the local, regional and national importance of these activities whilst managing actual and potential adverse effects generated by the activities.

Summary and Conclusions

The approach proposed by the PDP to provide Special Purpose Zones for the Field Days and Camp Columba sites is generally consistent with the approach taken by other Council's. Furthermore, the rationale for including Field Days and Camp Columba as Special Purpose Zones is consistent with best practice methods undertaken by other Councils, as outlined above.

4.6 Other Relevant Documents and feedback

The Field Days site has obtained resource consent (LU2017/357) for other temporary events, not connected to Field Days. The consent approved 45 additional events per year, ranging from 1 to 10 days, accommodating up to 10,000 people. The consent specifies various activities of varying duration and occurrence. Overnight accommodation associated with the events is permitted subject to standards. The decision contains 21 conditions relating to traffic management, noise, light spill, visitor accommodation and review conditions.

4.7 Analysis Results and Proposed District Plan Approach

The Operative District Plan does not recognise the unique nature of these sites or provide for the land use activities occurring there.

A special purpose zone is proposed for each site. The land use activities and anticipated outcomes of the zones are significant to the district and region. They are specific in their nature and therefore would be impractical to manage through a rural, urban or commercial zone.

Both Field Days and Camp Columba are located within the rural environment but would not practically be managed through the General Rural Zone provisions. The provisions relating to Field Days and Camp Columba are different from each other and from the General Rural Zone

provisions, which focus on productive land uses. Methods such as precincts or spatial layers would result in a cumbersome, complicated chapter which is not user friendly.

The proposed objectives and policies have been drafted to address the resource management issues relating to the Field Days and Camp Columba zones as identified in section 2.1 of this report and taking into account the background assessment (section 4.1 of this report). The PDP provisions reflect the existing activities occurring on the sites and provide for further expansion in line with the structure plan and/or standards. More specific objectives and policies are introduced, clearer matters of discretion are provided to reflect the particular characteristics of areas.

Field Days

Creating a Special Zone for the Field Day site recognises it as an asset to the Gore District. The provisions enabling the site to accommodate events will enable the facility to attract visitors to the district. This addresses issues 1 and 2.

The proposed provisions take into account the conditions applied through the resource consent process to mitigate effects, such as traffic. The standards mirror such upgrade requirements to prevent large scale events until improvements are made to the site. The provisions provide for the long term use and expansion of the activity. The activity is recognised as regionally significant as it provides a purpose built events venue capable of accommodating a variety of events, some very large. This addresses Issue 3.

Camp Columba

Creating a Special Zone for the Camp Columba site recognises it as an important asset to both the Gore District and the wider Southland region. The provisions enabling the site to host camps and outdoor activities as well as providing for onsite accommodation for staff. This addresses issues 1 and 2.

The proposed provisions include a structure plan which outlines how the camp may expand in the future and the provisions require future development to be consistent with that structure plan. This includes new outdoor activities and accommodation for staff. The provisions recognise the regional significance of the activity and provide for the long term use and expansion of the activity. This addresses Issue 3.

5. Scale and Significance

5.1 Scale and Significance Evaluation

Section 32(1)(c) of the RMA requires that this report contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.

	Comments	Assessment		
		Low	Medium	High
Degree of change from the Operative Plan.	Creating bespoke zones for these areas is a major change from the existing operative zoning and plan as			X

	Comments	Assessment		
		Low	Medium	High
	a whole. However, given the new zones are largely reflecting both existing use rights and approved resource consents, the change is not altering the current use of the sites to a huge degree.			
Scale of effects – geographically (local, district wide, regional, national).	The large-scale events Gore accommodates may have a regional effect. The Field Days site is paramount to this. Camp Columba is further recognised as regionally significant as it provides a strong community function to approximately 40% of schools across the Southland / Otago region and provides a valuable resource for the District. Additional effects are likely to be felt on a more local level in terms of potential nuisance effects such as traffic generation and noise.		X	
Effects on matters of national importance (s6 RMA).	The sites are not within locations that are a matter of national importance, they do not contain heritage buildings.	X		
Scale of effects on people (how many will be affected – single landowners, multiple landowners, neighbourhoods, the public generally, future generations?).	Effects are likely to be felt by multiple adjacent landowners.	X		
Scale of effects on those with specific interests, e.g., Tangata Whenua	It is unlikely that iwi will have a particular interest in this topic, although they broadly seek that Ngāi tahu cultural values are recognised.	X		
Degree of policy risk – does it involve effects that have been considered implicitly or explicitly by higher order documents? Does it involve effects addressed by other standards/commonly accepted best practice?	There are no higher order documents which relate to these sites specifically. The proposed Special Purpose zones are intended to be bespoke to provide for the existing activities on the site.	X		
Likelihood of increased costs or restrictions on individuals, communities or businesses.	The new provisions provide clearer guidance and are generally permissive in nature. The intention is to reduce the need for resource consents.	X		

5.2 Evaluation Summary

The management of activities on these sites is not substantially controlled through other planning documents such as regional plans, or through other legislation. The PDP provisions reflect the existing activities occurring on site and provide for further expansion in line with the structure plan and/or standards. More specific objectives and policies are introduced, clearer matters of discretion are provided to reflect the particular characteristics of areas.

Overall, the scale of significance is considered to be low and therefore, the level of detail provided within this evaluation is commensurate with the scale and significance of the environmental, economic and cultural effects that are anticipated from the implementation of the provisions.

6. Consultation

6.1 Overview

During the preparation of the District Plan Review, the Council is required by Clause 3 of Schedule 1 of the RMA to consult with the Minister for the Environment; other Ministers of the Crown and local authorities who may be affected and the tangata whenua of the area through iwi authorities. The Council may consult anyone else during the preparation of a proposed policy statement or plan.

The Section 32 – Overview and Urban Form and Development Evaluation Report provides an overview of the consultation undertaken to date in respect of the PDP.

6.2 Iwi Engagement

The PDP has been prepared in partnership with Hokonui Runanga who have reviewed and provided feedback on the temporary activities chapter to ensure consistency with the Mana Whenua Chapter and that cultural values are appropriately integrated throughout the proposed provisions.

6.3 Community and Stakeholder Engagement

Engagement with the community on the draft District Plan was undertaken 10th August 2022 to 30th September 2022. The feedback received in respect of the Temporary Activities Chapter is summarised below:

Person / Organisation	Feedback summary	Response
Field Days Zone		
Fire and Emergency NZ	Provide for emergency services facility as a permitted or RDA activity	The purpose of the Field Days Zone is to recognise the site as an events venue. The site does contain additional built form than anticipated in the General Rural zone, and so a facility may be appropriate in this location as it could provide for storage of vehicles or aid the services available to the rural area. A discretionary activity status is proposed for the activity.
Clark Fortune McDonald & Associates	Provisions generally appear reasonable.	Acknowledged.
Transpower	The Zone is traversed by the National Grid; amend Policy FDZ-P10 to specifically enable the exception of regionally significant infrastructure	The wording of FDZ-P10 has been amended to provide for activities that are compatible with the purpose, character and qualities of the Field Day zone. The existence of the National Grid across the zone has established

		the character and the regionally significant infrastructure will be recognised and protected. It is considered the reference to the health and safety and wellbeing of the community further supports the National Grid.
Camp Columba Zone		
Manager at Camp Columba	• Preference for two residential units for permanent accommodation and a further residential unit for short term accommodation. • Concern replacement / redevelopment of the high ropes course may breach height restrictions. • Noted a technical error in the spelling of Camp Columba in the draft district plan.	CCZ-R8 is amended to provide for three residential units provided they are occupied exclusively by a caretaker, manager or staff associated with the Camp and that one unit is used only for short term accommodation. The technical error is corrected. In the event that the high rope course breaches the height restriction resource consent could be sought and an assessment of effects undertaken at that time.
Ministry of Education	• Supportive of the provisions as drafted.	Acknowledged.
House Movers Section of the New Zealand Heavy Haulage Association Inc	• Provide for relocated dwellings.	Proposed to add a rule into the Temporary Activities chapter to cover relocatable dwellings, this rule would be applicable to all zones.
Fire and Emergency NZ	• Provide for emergency service facilities as a permitted activity or a restricted discretionary activity	Any emergency service facility should be ancillary to the permitted activities within the zone otherwise the activity would be inconsistent with the purpose of the zone.
Clark Fortune McDonald & Associates	• Considers the provisions are generally reasonable.	Acknowledged.
Feedback summary		
Field Days: There was positive feedback with others seeking greater provision for emergency services and the national grid. Camp Columba: Generally supportive feedback with some suggested amendments to provide for emergency service facilities and allow for additional residential units to provide accommodation for staff.		
Key changes in response to feedback		
Field Days: The purpose of the Field Days Zone is to recognise the site as an events venue however given the zone contains built form greater than the General Rural zone, an emergency services facility may be appropriate in this location. A discretionary activity status is proposed for the activity. The wording of FDZ-P10 has been amended to provide for regionally significant infrastructure. It is considered the reference to the health and safety and wellbeing of the community further supports the National Grid.		

Camp Columba: The purpose of the Camp Columba zone is to provide for community outdoor adventure / education and associated accommodation facilities, whilst emergency service facilities are not entirely consistent with this purpose ancillary emergency service facilities may support the activity and are therefore provided for.

The wording of CCZ-R8 has been amended to provide for a maximum of three residential units which may be occupied exclusively by staff members associated with Camp Columba with one residential unit being used only for short term (no more than 3 months at a time) accommodation.

7. Proposed Plan Provisions

7.1 Strategic Direction

The PDP Strategic Objective, UFD-O8 relates to enabling major facilities to operate efficiently and effectively for the contribution they make to the economic wellbeing and prosperity of the district. This is considered relevant to both the Field Days site and Camp Columba.

The mana whenua chapter articulates mana whenua and Te Taiao values. The objectives, policies and matters of discretion for rules within both zone chapters, integrate with the values identified in the mana whenua chapter to ensure appropriate consideration of cultural values. In particular all new buildings are subject to stream setbacks to minimise adverse effects on water quality and health, the Section 32 – Rivers and their Margins Evaluation report assesses the stream setback provisions in relation to the mana whenua chapter and the purpose of the Act.

7.2 Objectives, Policies and Rules – Field Days

The following provisions are proposed within the Field Days Special Purpose Zone Chapter of the PDP:

- | | |
|--------|---|
| FDZ-O1 | Major events, exhibitions and the use as a recreation area is encouraged to contribute to a vibrant district and enhance the social, economic and cultural well-being of communities. |
| FDZ-O2 | Activities are planned, located and managed to minimise adverse effects on amenity values, communities and the natural environment. |
| FDZ-O3 | The site, when not in use for events, maintains rural amenity and character |

There are ten policies proposed to give effect to the objectives. They focus on compatibility with the character and qualities of the Field Day Zone; managing the extent of commercial and residential activities; the location of buildings; infrastructure and waste management, traffic generation, noise and unantiquated activities.

There are eight permitted activity rules which give effect to the objectives and policies. The rules enable:

- Primary Production (excluding mining, quarrying or forestry activities)
- Temporary Events
- Community Facility
- Conservation Activity
- Commercial Activity (ancillary to events, office activity for events)
- Rural Commercial Recreation Activity
- Residential Activity
- Visitor Accommodation

The following standards apply to the above activities:

- Height set at a maximum of 12m
- Building coverage is limited to 5%
- Building must be setback 40m from any road boundary
- Setbacks from the zones boundaries as follows:
 - Residential Buildings: 30m
 - Dairy sheds and buildings that house animals: 50m
 - Permanent buildings greater than 500m²: 200m
 - Permanent Buildings associated with Event Activities: 25m.
 - All other buildings: 15m
- Setbacks from rivers and streams apply
- Events accommodating more than 2500 people must have an Events Management Plan and Traffic Management Plan approved by Council, and vehicle access standards must be met.

The proposed objectives and policies have been drafted to address the resource management issues relating to the Field Days zone as identified in section 2.1 and 4 of this report. The background assessment of the existing Council resource consents and Event Audits along with the scale and significance of the issues and topic have also informed the PDP provisions.

7.3 Objectives, Policies and Rules – Camp Columba

The following provisions are proposed within the Camp Columba Special Purpose Zone Chapter of the PDP:

CCZ-O1	The significant contribution made by Camp Columba to the social, cultural and health wellbeing of people and communities within and beyond the Gore District is recognised.
CCZ-O2	The existing and potential future compatible activities at Camp Columba are recognised and provided for.
CCZ-O3	Adverse effects generated by activities within the Camp Columba zone are effectively managed at the zone boundary.

There are four policies which give effect to the objectives they provide more specific direction on the types of activities which are appropriate and expansion of buildings and activities within the zone. The policies also seek to ensure that adverse effects from activities on sites in adjoining zones are managed.

There are nine permitted activity rules which give effect to the objectives and policies. The rules enable:

- Education Facility
- Visitor Accommodation Activity
- Community Facility
- Sport and Recreation Activity
- Healthcare Activity
- Activities which are ancillary to the above activities

The above activities are permitted where they are undertaken in accordance with the Camp Columba Structure Plan (which is included in the PDP).

- Residential Activity – subject to a maximum of three residential units which are occupied exclusively by a Camp Columba staff member, caretaker or managed and that one residential unit is only occupied on a short term basis (no more than 3 months at a time).
- Emergency Service Facilities provided they are ancillary to a permitted activity listed above other than Residential Activity.

The following standards apply to the above activities:

- Maximum building / structure height of 10m
- Setbacks from rivers and streams apply

The proposed objectives and policies have been drafted to address the resource management issues relating to the Camp Columba zone as identified in section 2.1 and 4 of this report.

7.4 Definitions

The following definitions are particularly relevant to the two Special Zone Chapters:

Temporary event means the use of land, buildings, tents and marquees and structures, for a limited duration, including for the following activities:

- a) carnivals
- b) fairs;
- c) public art;
- d) festivals;
- e) fundraisers;
- f) galas;
- g) markets;
- h) meetings;
- i) exhibitions (Including Southern Field Days);
- j) concerts;
- k) community, recreation, or ceremonial events;
- l) parades;
- m) rallies;
- n) shows (including the A&P Show);
- o) musical and theatrical entertainment,

p) uses similar in character.

Commercial activity means any activity trading in goods, equipment or services. It includes any ancillary activity to the commercial activity (for example administrative or head offices).

Community Facility means land and buildings used by members of the community for recreational, sporting, cultural, safety, health, welfare, or worship purposes. It includes provision for any ancillary activity that assists with the operation of the community facility.

Conservation activity means the use of land for the management, maintenance and enhancement of ecological values for indigenous vegetation and fauna and their habitats. It includes:

- a. both western Science or mātauranga Māori;
- b. weed and pest control;
- c. fencing; and
- d. restoration planting.

Rural Commercial Recreation Activity means a commercial activity relating to the guiding, training, instructing, transportation or provision of equipment to clients for recreational purposes including the use of any building or land associated with the activity.

Event Management Plan means an event overview document, approved by Council, which includes the following:

- a. A description of the proposed event, including the type, scale, and duration, and number of persons catered for
- b. Health and safety
- c. How the event will minimise and manage waste from the event.
- d. Adequate sanitation facilities for the event
- e. The protocol for receiving, processing and responding to complaints related to the event
- f. The steps taken to minimise any potential adverse impacts on the environment
- g. Where applicable, practices for ensuring animal welfare, including provision of drinking water and effluent management"

Traffic Management Plan means a plan prepared in conformity with the New Zealand Transport Agency Code of Practice for Temporary Traffic Management. The plan must be approved by the applicable road controlling authority.

The Traffic Management Plan shall include:

- a. A description of the method/s proposed to record the number of traffic movements and trip distribution for each event. temporary road closures and/ or signage
- b. Protocols for the sharing of traffic movement data with Council.
- c. The protocol for receiving, processing and responding to complaints related to traffic.

Visitor Accommodation means land and/or buildings used for accommodating visitors, subject to a tariff being paid, and includes any ancillary activities.

8. Evaluation of Objectives

This section of the report evaluates the proposed objectives as to whether they are the most appropriate to achieve the purpose of the Act.

Existing Objective	Appropriateness to achieve the purpose of the Act
As identified above there are no specific objectives relating to the Rural zone within which the Field Days and Camp Columba sites are located in the ODP, however, the following objectives would broadly direct the decision maker in respect of amenity values. 3.3(1) - Maintain and enhance the amenity values of the various localities within the district whilst respecting the different values and characteristics that exist within each area. 3.3(2) - Ensure that the effects of land use activities do not adversely affect the quality of the environment and are compatible with the characteristics and amenity values of each locality	These objectives provide high level guidance to decision makers around the expectations for maintaining, enhancing and managing adverse effects on amenity values within the district and in this respect they are broadly consistent with RMA Section 5(2)(c) but are not considered to fully achieve the purpose of the Act due to the lack of specific clarity and direction. Relevance and usefulness Whilst the objectives are broad enough to be applicable, they do not specifically address the types of activities now occurring on the Filed Days site and the effects these activities may generate. The objectives do not address the issues discussed in this report given the growth of the Field Days site and departure from a typical rural land parcel. Furthermore, the objectives do not recognise the short-term, temporary and localised nature of the adverse effects of the temporary events occurring on site. They provide insufficient guidance on managing the potential adverse effects of large scale temporary events on amenity values and health, rural character, traffic generation and the purpose/intent of the zone. This lack of guidance may hinder the Council's ability to undertake its functions under s31 of the RMA. The objectives do not achieve best practice as they do not provide for clear outcomes or sufficiently describe an end state given these generic objectives are applicable to all zones. Reasonableness: The objectives may have the potential to result in unnecessary costs on the community as the lack of clarity and direction in the Objectives does not provide clear guidance on the appropriateness or otherwise of non-rural activities occurring on the Field Days site. Achievability: The provisions seek outcomes within the scope of Council's responsibilities and can be realistically achieved through regulations at a district level. However, the objectives are not consistent with the identified mana whenua or community outcomes which seek a more directive approach to provide for economic growth and development of the district and manage the actual and potential adverse effects arising from development.

Field Days Zone

Proposed Objective	Appropriateness to achieve the purpose of the Act
FDZ-O1 Major events, exhibitions and the use as a recreation area is encouraged to contribute to a vibrant district and enhance the social, economic and cultural well-being of communities. FDZ-O2 Activities are planned, located and managed to minimise adverse effects on amenity values, communities and the natural environment.	The objectives are considered the most appropriate way to achieve the purpose of the Act because they: - Recognise that major events and community facilities may have adverse effects on the environment and amenity values of people and manages such effects (RMA Section 5(2)(c)). - Recognise that major events and community facilities supports the social, economic and cultural wellbeing of people and communities by bringing vitality to the district (RMA Section 5(2)). - Recognise that major events may have adverse effects on the amenity of a local environment, where nuisance effects such as traffic are inconsistent with the anticipated traffic levels of a particular area (RMA Section 5(2)(c)). Relevance and usefulness The proposed objectives directly relate to the issues identified earlier in this report. They are specific to the site and recognise Field Days as an asset to the Gore District. The objectives address the identified resource management issue by providing for a range of activities to reflect existing patterns of land use in the zone locations and providing for the needs of the community. The objectives provide clearer direction as to the purpose and function of the Field Days Zone. The objectives assist Council to undertake its functions under s31 by provide clear direction and an appropriate framework for managing development and land uses within the zone.

	The objectives provide clarity and direction for Plan users and decision makers as they clearly articulate the anticipated outcomes for the Field Days Zone in terms of its purpose and function. The objectives align with best practice by clearly articulating the intended outcomes and provide clear direction for plan users and decision makers Reasonableness: The objectives will avoid unjustifiably high costs on the community as they will enable existing land use activities to remain and if necessary to expand without unnecessary resource consent approval. The objectives are clear and directive and therefore avoid uncertainty and risk for those looking to utilise the site as an events venue. Achievability: The objectives are consistent with the identified tangata whenua values expressed in the mana whenua chapter. The objectives also take account of community feedback received and provide for appropriate social, cultural and economic outcomes to meet the identified needs of the community. The provisions seek outcomes within the scope of Council’s responsibilities and can be realistically achieved through regulations at a district level.
Proposed Objective	Appropriateness to achieve the purpose of the Act
FDZ-O3 The site, when not in use for events or community activities, maintains rural amenity and character	The objective is considered the most appropriate way to achieve the purpose of the Act because it: • The objectives provide for sustainable management whilst ensuring adverse effects are avoided, remedied or mitigated. • The objectives will ensure that amenity values are maintained and enhanced (Section 7(c)). • The objectives will ensure that the quality of the environment is maintained and enhanced by enabling the land can be utilised for practical activities such as stock grazing and pest control (Section 7(f)). • The objectives provide for sustainable management whilst ensuring adverse effects are avoided, remedied or mitigated; recognising that when not used for events and community facilities, the site can be utilised as rural resource (RMA Section 5(2)). Relevance and usefulness The objectives address the identified resource management issue by providing for a range of activities to reflect existing patterns of land use in the zone locations and providing for the needs of the community. The objectives provide clearer direction as to the purpose and function of the Field Days zone. The objectives align with best practice by clearly articulating the intended outcomes and provide clear direction for plan users and decision makers Reasonableness: The objectives will avoid unjustifiably high costs on the community, as the framework is relatively permissive, and where consent is required, the activities are extending beyond the managed parameters such that they require greater management or are events that will be large and the requirement of consent an expectation. There are direct economic benefits to the District as a result of events at the Field Days site, for example from increased visitor spending and use of accommodation providers in Gore. There is a low level of uncertainty and risk given that the provisions are reflecting existing resource consents obtained for the site rural activities are still enabled. The additional provisions aim to reflect existing activities occurring or enable opportunity for development in the future. Achievability: The provisions seek outcomes within the scope of Council’s responsibilities and can be realistically achieved through regulations at a district level. They are consistent with supporting and implementing Councils 2021 Events Strategy.

Camp Columba Zone

Proposed Objective	Appropriateness to achieve the purpose of the Act
CCZ-O1 – The significant contribution made by Camp Columba to the social, cultural and health wellbeing of people and communities within and beyond the Gore District is recognised.	The objective is considered the most appropriate way to achieve the purpose of the Act because it: • Recognise that Camp Columba, as a community facility supports the social, economic and cultural wellbeing of people and communities by bringing vitality to the district (RMA Section 5(2)). • Section 6(e) – the objective respect the relationship of Māori and their culture.
CCZ-O2 – The existing and potential future compatible activities at Camp Columba are recognised and provided for.	Relevance and usefulness

	The proposed objectives directly relate to the issues identified earlier in this report. They are specific to the site and recognise Camp Columba as an asset to the Gore District and the wider region. The objectives address the identified resource management issue by providing for a range of activities to reflect existing patterns of land use in the zone and provide for the needs of the community. The objectives provide clearer direction as to the purpose and function of the Camp Columba Zone. The objectives assist Council to undertake its functions under s31 by provide clear direction and an appropriate framework for managing development and land uses within the zone. The objectives provide clarity and direction for Plan users and decision makers as they clearly articulate the anticipated outcomes for the Camp Columba Zone in terms of its purpose and function. The objectives align with best practice by clearly articulating the intended outcomes and provide clear direction for plan users and decision makers. Reasonableness: The objectives will avoid unjustifiably high costs on the community as they will enable existing land use activities to remain and if necessary to expand without unnecessary resource consent approval. The objectives are clear and directive and therefore avoid uncertainty and risk for those looking to utilise the site as an important community facility. Achievability: The objectives are consistent with the identified mana whenua values expressed in the mana whenua chapter but providing a link to the cultural values of the community. The objectives also take account of community feedback received and provide for appropriate social, cultural and economic outcomes to meet the identified needs of the community. The provisions seek outcomes within the scope of Council’s responsibilities and can be realistically achieved through regulations at a district level.
Proposed Objective	Appropriateness to achieve the purpose of the Act
CCZ-O3 - Adverse effects generated by activities within the Camp Columba zone are effectively managed at the zone boundaries.	The objective is considered the most appropriate way to achieve the purpose of the Act because it: • Recognises that Camp Columba, as a community facility may have adverse effects on the environment and amenity values of people and manages such effects (RMA Section 5(2)(c)). • The objectives provide for sustainable management whilst ensuring adverse effects are avoided, remedied or mitigated. • Section 6(e) – the provisions respect the relationship of Māori and their culture • The objectives will ensure that amenity values are maintained and enhanced (Section 7(c)). Relevance and usefulness The objectives address the identified resource management issue by seeking to ensure activities undertaken in the zone do not adversely affect other sites in adjoining zones. The objectives align with best practice by clearly articulating the intended outcomes and provide clear direction for plan users and decision makers. Reasonableness: The objectives will avoid unjustifiably high costs on the community, as the framework is relatively permissive, particularly where activities and future development aligns with a structure plan which has been accepted by Camp Columba and will form part of the planning framework. There are direct economic benefits to the District from Camp Columba which provides a valuable facility for whanau and particularly young people from the Gore district and wider region. There is a low level of uncertainty and risk given that the provisions reflect existing activities and permitted development must be in accordance with a published structure plan. Achievability: The provisions seek outcomes within the scope of Council’s responsibilities and can be realistically achieved through regulations at a district level.

Summary The Field Days Zone objectives set clear outcomes anticipated by the District Plan in relation to land use activities on the Field Days site. Providing objectives specific to temporary events, gives plan users and decision makers certainty as to what is appropriate under the District Plan provisions. The Camp Columba objectives also set clear outcomes to address identified resource management issues and provide for existing activities with opportunities for limited future expansion to meet the social, economic and cultural needs of people and communities.

Overall, the proposed Objectives provide greater clarity and certainty for Plan users and decision makers whilst also achieving the purpose of the Act in a reasonable, useful, relevant and achievable manner. The objectives will allow Council to fulfil their obligations under s31 of the Act, are consistent with identified cultural values and align with relevant strategic direction.

9. Evaluation of Options to Achieve the Objectives

9.1 Introduction

Section 32(1)(b) requires an evaluation of whether the provisions are the most appropriate way to achieve the objectives by identifying other reasonably practicable options, assessing the efficiency and effectiveness of the provisions in achieving the objectives, and summarising the reasons for deciding on the provisions.

The assessment must identify and assess the benefits and costs of environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions, including opportunities for economic growth and employment. The assessment must if practicable quantify the benefits and costs and assess the risk of acting or not acting if there is uncertain or insufficient information available about the subject matter.

For each potential approach an evaluation has been undertaken relating to the costs, benefits and the certainty and sufficiency of information (as informed by section 4 of this report) in order to determine the effectiveness and efficiency of the approach, and whether it is the most appropriate way to achieve the relevant objective(s). For the purpose of this evaluation, the Council has considered the following potential options:

- Option A - The proposed provisions
- Option B - The 'status quo' provisions.

9.2 Quantification of Costs and Benefits

Section 32(2)(b) requires that if practicable the benefits and costs of a proposal are quantified.

Based on the scale and significance of the proposed changes, specifically the degree of change from the ODP, level of policy risk and scale of effects, it is considered that quantifying costs and benefits is unnecessary. Therefore, exact quantification of the benefits and costs identified in this report was not considered necessary, beneficial or practicable. Rather, the table below generally identifies where there may be additional cost(s) and benefit(s).

9.3 Evaluation of Options

Option A – Proposed Provisions – Field Days Zone

Objective FDZ-O1 - Major events, exhibitions and the use as a recreation area is encouraged to contribute to a vibrant district and enhance the social, economic and cultural well-being of communities.

Policies, rules and standards which give effect to the objective:

FDZ-P2 - Recognise and encourage the contribution that temporary events make to the social, economic and cultural wellbeing of the District's people and communities.

FDZ-P3 - Allow commercial activities such as administration offices, and visitor accommodation only where they are ancillary to the events focus of the zone.

FDZ-P4 - Allow limited residential activity to facilitate the operation of the permitted activities within the zone only.

FDZ-R2 Temporary events; SPZ-FD-R3 Community Facilities; SPZ-FD-R5 Commercial activities ancillary to temporary events; SPZ-FD-R6 Rural Commercial activities; SPZ-FD- R7 residential activity limited to a care taking role; and visitor accommodation activities ancillary to an event are permitted on site.

Objective –FDZ-O2 - Activities are planned, located and managed to minimise adverse effects on amenity values, communities and the natural environment.

Policies, rules and standards which give effect to the objective:

FDZ-P4 - Allow limited residential activity to facilitate the operation of the permitted activities within the zone only.

FDZ-P5 - Enable development that retains the open rural visual character as viewed from public places and adjacent properties, and Ngāi Tahu cultural values.

FDZ-P6 - Require buildings to be set back a minimum distance from zone boundaries, stream boundaries and road boundaries in order to mitigate potential adverse effects on open space, ecological values, Ngāi Tahu cultural values, visual amenity, and outlook from neighbouring properties. FDZ-P7 - Require adequate infrastructure, waste minimisation (including stock effluent management), traffic management, emergency management, security, and sanitation facilities to be available to cater for anticipated attendants at large-scale temporary events, through the use of Event and Traffic Management Plans. FDZ-P8 - Ensure traffic from events does not diminish rural amenity or affect the safe and efficient operation of the roading and trail network, or access to public places. FDZ-P9 - Recognise that noise is an anticipated component of temporary events, while protecting the amenity of neighbouring properties from undue noise during night-time hours. Standards are proposed relating to height, building coverage, setbacks from the road, rivers and zone boundaries. Large events must have an approved event management plan and traffic management plan. Objective FDZ-O3 - The site, when not in use for events, maintains rural amenity and character. Policies, rules and standards which give effect to the objective: FDZ-P1 Enable primary production activities where these are compatible with the character and qualities of the Field Day Zone. FDZ-P5 - Enable development that retains the open rural visual character as viewed from public places and adjacent properties, and Ngāi Tahu cultural values. FDZ-P6 - Require buildings to be set back a minimum distance from zone boundaries, stream boundaries and road boundaries in order to mitigate potential adverse effects on open space, ecological values, Ngāi Tahu cultural values, visual amenity, and outlook from neighbouring properties. FDZ-P10 - Only allow other activities where they are compatible with the purpose, character and qualities of the Field Day zone; where adverse effects on the use and amenity values of adjoining sites are avoided, remedied or mitigated; and the activity contributes to the overall health and wellbeing of the community. FDZ-R1 - Primary Production; SPZ-FD-R4 Conservation and SPZ-FD- R7 residential activity limited to a care taking role are permitted on site.	
Benefits	Costs
Environmental - Provides an ability for a range of temporary events to occur as a permitted activity within a purpose built site; whilst still providing for agricultural activities. - The site has ample parking and facilities to support these events. Larger events require management plans to demonstrate effects on the environment will be managed. The standards further include roading upgrades to manage traffic effects. - All provisions are clearly set out in one chapter with a clear framework, acknowledging the unique nature of the site and to manage activities that reflect the existing land use on site. - The activities are controlled or managed to ensure adverse effects on the environment are minimised. - The quality of the environment and amenity values will be maintained or enhanced. - Matters of discretion provide greater clarity and efficiency for decision making by limiting the scope to relevant matters only. - Clear definitions for terms provides greater certainty.	Environmental - As there is no limit on temporary events, it is possible the site will be used as a venue full time. This could generate environmental effects on amenity, noise and transport. Standards have been put in place to manage transport. The site is further reasonably remote and removed from residential living. - Some of the bulk and location standards, particularly coverage and setbacks, may reduce the ability to fully maximise a site for development. Nonetheless, consent can be applied for and the additional built form assessed on a case by case basis.
Economic The special purpose zoning provides for economic growth for the district by attracting large scale events and therefore people to the district who may spend money in the town or utilise accommodation providers.	Economic - Loss of potential development rights for residential activities in the zone. - There will be a loss of land zoned rural however provision has been made agricultural activities, though not intensive productive activities.

	The standards for roading are costly to implement, however these are consistent with existing consent conditions which were imposed for the larger scale events on the site.
Social The provisions will create a community asset to be utilised by the district and wider Southland area. The needs of the community are met without detracting from the rural amenity area.	Social There are no anticipated social costs associated with the proposed provisions.
Cultural The provisions integrate cultural values associated with water through stream setbacks.	Cultural There are no anticipated cultural costs associated with the proposed provisions.
Efficiency	
There are a number of improved efficiency outcomes associated with the PDP provisions. These included: - Provision of a wide range of activities recognising how the site has developed into an events venue. The proposed provisions provide for increased community development opportunities. - Improved clarity through more directive objectives and policies which provides greater certainty for plan users and decision makers and will improve efficiency compared to the status quo option. Overall, the environmental, economic and social benefits outweigh the economic cost associated with the proposed provisions which will generally provide more effectively for existing activities.	
Effectiveness	
The proposed provisions are considered to be the most effective means of achieving the objectives for the following reasons: - The special purpose zone provisions recognise the existing land use activities occurring at the site and enable the site to be utilised to its full potential. This will provide jobs and community facilities and economically support the District. - They will provide for zoning and provisions which are consistent with the National Planning Standards. - They will increase the effectiveness of the plan provisions in achieving positive outcomes by providing greater clarity and certainty. - The provisions align with the cultural values, interests, rights and relationships expressed in the Mana whenua Chapter. - They will enable Council to fulfil its statutory obligations under the Resource Management Act to maintain and enhance both the amenity value and quality of the environment (sections 7(c) and 7(f)) and ensure that development is undertaken in a sustainable manner which appropriately avoids, remedies or mitigates adverse effects (section 5(2)(c)). - They will enable Council to effectively administer its District Plan and to monitor the outcomes of the proposed provisions in a clear and consistent manner.	
Risk of acting or not acting	
The Council has sufficient information to determine that the provision of a Special purpose Zones in these are appropriate to meet the social, economic and cultural needs of the community and generally reflect existing patterns of land use. The Plan provisions have been tested and determined to be feasible and to provide for good quality outcomes. The provisions address both the resource management issues identified and the shortcomings identified with the ODP. Overall, the risk of acting is considered to be low, however, the risk of not acting is higher as the ODP has been identified as insufficient to provide for development and managed adverse effects on the environment.	
Overall Evaluation	
The proposed policies and methods are an appropriate option to achieve the objectives for the Field Days Zone. The benefits outweigh the costs and the methods efficiently give effect to the proposed objectives by reaching an appropriate balance between the enablement and management of activities in order to address the identified resource management issues.	

Option A – Proposed Provisions – Camp Columba	
Objectives CC-O1 – The significant contribution made by Camp Columba to the social, cultural and health wellbeing of people and communities within and beyond the Gore District is recognised. CC-O2 – The existing and future compatible activities at Camp Columba are recognised and provided for. Policies, rules and standards which give effect to the objective: CC-P1 - Provide for a range of Outdoor adventure, education, accommodation, community engagement activities and ancillary activities which serve a functional need within the Camp Columba zone where these provide for the needs of the wider southern community. CC-P2 - Provide for the expansion of buildings and activities within the Camp Columba zone in accordance with the Structure Plan. CC-R1-R6 – permits education facility, visitor accommodation activity, community facility, sport and recreation activity, healthcare activity and activities ancillary to these activities. CC-R7 – permits residential activities subject to limits (three residential units used exclusively by Camp Columba caretaker, manager or staff with one residential unit used on for short term accommodation no more than 3 months at a time). CC-R8 – Emergency Services Facilities are permitted where they are ancillary to an activity permitted under Rules SPC-CC-R1-R6. CC-R10 – all other activities are non-complying. Objectives CC-O3 - Adverse effects generated by activities within the Camp Columba zone are effectively managed at the zone boundary. Policies, rules and standards which give effect to the objective: CCZ-P3 – Promote and protect Camp Columba as a dark-skies viewing area. CC-P4 – Manage adverse effects of activities within the zone to maintain the character and amenity of adjoining zones. CC-R9 – Erection of buildings are permitted provided they are in accordance with the Camp Columba Structure Plan. CC-S1 – The maximum height of buildings and structures must not exceed 10m. CC-S2 – All buildings and structures must be setback from rivers and streams either 5m, 10m or 20m dependent on the stream / river order.	
Benefits	Costs
Environmental - Provides an ability for the existing activities to continue as a permitted activity and for expansion of those activities in accordance with an approved structure plan. - The structure plan will ensure expansion and existing activities are undertaken in a manner which mitigates adverse effects on the environment and surrounding landowners. - All provisions are clearly set out in one chapter with a clear framework, acknowledging the unique nature of the site and to manage activities that reflect the existing land use on site. - The activities are controlled or managed to ensure adverse effects on the environment are minimised - The quality of the environment and amenity values will be maintained or enhanced. - Matters of discretion provide greater clarity and efficiency for decision making by limiting the scope to relevant matters only. - Clear definitions for terms provides greater certainty.	Environmental There are limited environmental costs as the structure plan provides clear direction and mitigation in respect of potential environmental effects.

Economic - The special purpose zoning provides for economic growth for the Camp by providing for expansion opportunities. - There would be a reduced cost associated with resource consents which would be required if the activity were to expand under the ODP.	Economic There will be a loss of land zoned rural however, as the activity is existing this is considered to be a limited cost.
Social The provisions will create a community asset to be utilised by the district and wider Southland area. The needs of the community are met without detracting from the rural amenity area.	Social There are no anticipated social costs associated with the proposed provisions.
Cultural The provisions integrate cultural values associated with water through stream setbacks.	Cultural There are no anticipated cultural costs associated with the proposed provisions.
Efficiency	
There are a number of improved efficiency outcomes associated with the PDP provisions. These included: - The proposed provisions provide for increased community development opportunities through expansion of an activity which provides a social and cultural benefit to the district and wider region. - Improved clarity through more directive objectives and policies which provides greater certainty for plan users and decision makers and will improve efficiency compared to the status quo option. Overall, the environmental, economic and social benefits outweigh the economic cost associated with the proposed provisions which will generally provide more effectively for existing activities.	
Effectiveness	
The proposed provisions are considered to be the most effective means of achieving the objectives for the following reasons: - The special purpose zone provisions recognise the existing land use activities occurring at the site and enable the site to be utilised to its full potential. This will provide jobs and community facilities and economically support the district. - They will provide for zoning and provisions which are consistent with the National Planning Standards. - They will increase the effectiveness of the plan provisions in achieving positive outcomes by providing greater clarity and certainty. - The provisions align with the cultural values, interests, rights and relationships expressed in the Mana whenua Chapter. - They will enable Council to fulfil its statutory obligations under the Resource Management Act to maintain and enhance both the amenity value and quality of the environment (sections 7(c) and 7(f)) and ensure that development is undertaken in a sustainable manner which appropriately avoids, remedies or mitigates adverse effects (section 5(2)(c)). - They will enable Council to effectively administer its District Plan and to monitor the outcomes of the proposed provisions in a clear and consistent manner.	
Risk of acting or not acting	
The Council has sufficient information to determine that the provision of a Special purpose Zones in these are appropriate to meet the social, economic and cultural needs of the community and generally reflect existing patterns of land use. The Plan provisions have been tested and determined to be feasible and to provide for good quality outcomes. The provisions address both the resource management issues identified and the shortcomings identified with the ODP. Overall, the risk of acting is considered to be low, however, the risk of not acting is higher as the ODP has been identified as insufficient to provide for development and managed adverse effects on the environment.	
Overall Evaluation	
The proposed policies and methods are an appropriate option to achieve the objectives for the Field Days Zone. The benefits outweigh the costs and the methods efficiently give effect to the proposed objectives by reaching an appropriate balance between the enablement and management of activities in order to address the identified resource management issues.	

Option B – Status Quo	
Relevant Objectives: 3.3(1) - Maintain and enhance the amenity values of the various localities within the district whilst respecting the different values and characteristics that exist within each area. 3.3(2) - Ensure that the effects of land use activities do not adversely affect the quality of the environment and are compatible with the characteristics and amenity values of each locality. Policies and rules which give effect to the objectives: <i>Policies</i> 3.4(1) Establish zones that reflect the characteristics and amenity values of the area. 3.4(2) Control the adverse effects of land use activities on the environment. <i>Rules which specifically apply to the Field Days Site:</i> 4.2.1(1) <i>permits land use activities</i> 4.2.4 <i>Any land use activity which does not comply with 4.2.1(1) is a Discretionary Activity</i> 4.3.1(d) <i>Agricultural field-days at the Waimumu Field Day site</i> 4.5.1(1) <i>Noise</i>; 4.6.1(a) <i>Lightspill</i>; 4.7.1 <i>Daylight admission</i>; 4.7A.a(1) <i>Yards</i>; 4.8.1 <i>Height (12m)</i>; 4.9.1.1(a) <i>Site Coverage 40% or 500m²</i>	
Benefits	Costs
Environmental There is a broad framework which provides consideration of amenity values and takes account of the anticipated character of an area.	Environmental The rules are out of date for the existing land uses on site. Different types of temporary activities are not distinguished and provided for and there is no guidance on large-scale events such as Field Days There is uncertainty as to whether buildings on site are for events purposes and require consent or are for rural purposes.
Economic The plan does provide for Field Days and agriculture based events and a resource consent has been obtained. If the site is utilised within these parameters no further consents would be required	Economic The lack of policy framework may increase consenting costs to both Council and the applicants. Community groups and event organisers have to obtain consents or variations if they want to depart from the resource consent obtained. The provision of events is a key aspect of the District's identity and the current district plan does not recognise that the Field Days site is an important asset to achieve this.
Social Retain familiarity with the existing rules. There is certainty in the knowledge that agricultural field days activities can occur at the Field Days	Social The provision of events is a key aspect of the District's identity and the uncertain, restrictive nature of the plan may harm this
Cultural There are no known cultural benefits associated with the current provisions.	Cultural The setback provisions for buildings in proximity to rivers are outdated and limited
Efficiency	

The current zoning and planning provisions are very high level, not up to date with current land use patterns, and do not provide sufficient direction or certainty to the plan users. There is a lack of specific objectives and policies tailored for the purpose of each zone leading to subjective decision making. In summary there is not a clear connection between desired outcomes, development and the planning provisions.

Effectiveness

The provisions are not effective as they do not provide sufficient direction or clarity, given the site is now no longer a typical rural landholding. The anticipated amenity in the area has changed.

The existing provisions do not meet the social, economic and cultural needs of people and their communities given they are restrictive on a site which is an asset to the community for a variety of commercial, community and cultural events.

Risk of acting or not acting

The risk of not acting would be that further resource consents are required which may deter events coming to the Gore District.

9.4 Summary of Preferred Options

Summary

- Overall, the preferred option is the proposed provisions (Option A) which:
- Achieve the purpose of the Act.
 - Provide greater certainty to the community on the use of the site enabling existing land use activities on the site.
 - Provide greater direction and certainty for plan users and decision makers.
 - Provide for temporary events which meet the social, economic and cultural needs of people and the community.