

**RURAL CONTRACTORS NEW ZEALAND SUBMISSION  
ON THE PROPOSED PORIRUA DISTRICT PLAN**

**To:** Porirua City Council  
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Rural Contractors New Zealand Inc. ("RCNZ") wishes to be heard in support of this submission and will consider combining with others to present a joint case with them at the hearing.

I confirm that I am authorised on behalf of RCNZ to make this submission.

RCNZ could not gain an advantage in trade competition through this submission.

## 1 OVERVIEW

1.1 Rural Contractors New Zealand Incorporated (“RCNZ”) generally supports the Proposed Porirua District Plan subject to the amendments sought in this submission (refer **Attachment A**).

1.2 In the submissions set out in Attachment A, consistent with the RCNZ is seeking to ensure that the Proposed Porirua District Plan provides a more enabling planning framework that better recognises and provides for the establishment and ongoing operation of rural contractor depots as an integral and essential rural activity within the General Rural Zone.

1.3 RCNZ is the only national association and the leading advocate for rural contractors in New Zealand representing the interests of contractors engaged in a wide range of activities and is an Affiliated Member of Federated Farmers. RCNZ monitors central and local government policies and plans. It maintains close relations with a wide number of organisations, government departments and other bodies.

1.4 There has been a growing trend in the share of rural contracting in total agricultural production with an estimated 1100 rural contractors nationwide. This has been indicative of a trend toward greater specialisation and contracting out of the inputs to rural production. Contractors are used for the skills they have gained through specialisation, the machinery and technology they can offer, and as a substitute for other labour.

1.5 The main industry users of services from the rural contracting industry are horticulture and fruit growing, livestock cropping and farming, dairy and cattle farming, forestry, and services to agriculture and hunting and trapping. Specific examples of rural contractor services include:

- Aeration;
- Cultivation;
- Earth moving;
- Fertilising;
- Grain and seed harvesting;
- Land clearing and development;
- Park and reserve maintenance;
- Root raking;
- Spraying;
- Windrowing;
- Hay and silage making;
- Drilling;
- Farm drainage;
- Hedge and shelter cut;
- Mowing;
- Ploughing;
- Aerial and land spraying;
- Track maintenance;
- Cartage;
- Fencing;
- Forestry;
- Horticulture;
- Mulching;
- Viticulture.

1.6 Rural contractors make a significant contribution to rural communities, by providing off-farm work and casual workers for the farming sector and contributing to the economic and social health of local areas. Due to the nature of their business and the clients they serve, rural contractor depots are typically established in rural areas. The scale of rural contractor depots can vary from relatively small-scale seasonal operators, some of whom have established the business as a logical extension of an existing farming operation, to larger larger-scale businesses operating solely as a rural contractor depot.

1.7 Rural contractors are critical in ensuring the prosperity, security, and sustainability of New Zealand's pastoral and forestry sectors which are the backbone of our economy and their continued success is essential to this country's living standards. Sound planning is required to ensure that activities that are integral to the rural industry such as rural contractors are sufficiently recognised, provided for and protected for future generations in terms of key planning documents such as the Proposed Porirua District Plan.

## 2 SPECIFIC SUBMISSION POINTS

2.1 RCNZ's specific submission points are provided in **Attachment A**.

2.2 In respect of all of those submission points in **Attachment A**, RCNZ seeks:

- Where specific wording has been proposed, words or provisions to similar effect;
- All necessary and consequential amendments, including any amendments to the provisions themselves or to other provisions linked to those provisions submitted on, and including any cross references in other chapters; and
- All further relief that are considered necessary to give effect to the concerns described above and in **Attachment A**.

**Signature:** **RURAL CONTRACTORS NEW ZEALAND INC.**  
by its authorised agents Mitchell Daysh Limited



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G.J. Mathieson

**Date:** 20<sup>th</sup> November 2020

ATTACHMENT A: RURAL CONTRACTOR NEW ZEALAND'S SUBMISSIONS ON THE PROPOSED PORIRUA DISTRICT PLAN				
REF	PROVISION	SUPPORT/ OPPOSE	REASONS	RELIEF SOUGHT
1	Part 1: Introduction & General Provisions/Interpretation/Definitions New definition for "rural contractor depot"	Support in part	The definition of "rural industry" would include a rural contractor depot because it is "an industry or business undertaken in a rural environment that directly supports, services, or is dependent on primary production". As a result, a restricted discretionary activity resource consent would be required for a rural contractor depot in the General Rural Zone under Rule GRUZ-R18 regardless of scale and associated environmental effects. In many cases, small-scale rural contractor depots are established as a logical business extension of an existing farming operation for seasonal work. Consistent with other District Plans, RCNZ is seeking a new rule in the General Rural Zone permitting small-scale rural contractor depots (with a consequential amendment to Rule GRUZ-R18). To assist with the implementation of the proposed new permitted activity rule, RCNZ seeks the introduction of a definition for "rural contractor depot" in the Definitions section.	Include the following definition for "Rural contractor depot": <u>The land and buildings used for the purposes of storing or maintaining machinery, equipment and associated goods and supplies associated with a rural contracting business that directly supports, services or is dependent on primary production.</u>
2	Part 3: Area Specific Matters/Rural Zones/GRUZ – General Rural Zone/Rules Section: New permitted activity rule for "rural contractor depot"	Support in part	The definition of "rural industry" would include a rural contractor depot because it is "an industry or business undertaken in a rural environment that directly supports, services, or is dependent on primary production". As a result, a restricted discretionary activity resource consent would be required for a rural contractor depot in the General Rural Zone under Rule GRUZ-R18 regardless of scale and associated environmental effects. In many cases, small-scale rural contractor depots are established as a logical business extension of an existing farming operation for seasonal work.	Include the following new permitted activity rule: <b><u>GRUZ-R15A Rural contractor depot</u></b> 1. <b><u>Activity status: Permitted</u></b> <b><u>Where:</u></b> a. <u>The maximum number of staff is five (other than persons living on the site)</u> b. <u>The rural contractor depot (including associated vehicle access, parking and manoeuvring areas) is located at least 50m from an existing noise-sensitive activity or place of worship on a site under separate ownership.</u>

ATTACHMENT A: RURAL CONTRACTOR NEW ZEALAND’S SUBMISSIONS ON THE PROPOSED PORIRUA DISTRICT PLAN				
REF	PROVISION	SUPPORT/ OPPOSE	REASONS	RELIEF SOUGHT
			Consistent with other District Plans, RCNZ is seeking a new rule in the General Rural Zone permitting small-scale rural contractor depots (with a consequential amendment to Rule GRUZ-R18). To assist with the implementation of the proposed new permitted activity rule, RCNZ seeks the introduction of a definition for “rural contractor depot” in the Definitions section.	2. <b><u>Activity status: Restricted discretionary</u></b> <b><u>Where:</u></b> a. <b><u>Compliance is not achieved with GRUZ-R15A.a or GRUZ-R15A.b.</u></b> <b><u>Matters of discretion are restricted to:</u></b> 1. <b><u>The matters in GRUZ-P4.</u></b>
3	Part 3: Area Specific Matters/Rural Zones/GRUZ – General Rural Zone/Rules Section: GRUZ-R18	Support in part		Amend GRUZ-R18 as follows: <b><u>GRUZ-R18 Rural industry, excluding a rural contractor depot</u></b> 1. <b><u>Activity status: Restricted discretionary</u></b> <b><u>Matters of discretion are restricted to:</u></b> 1. <b><u>The matters in GRUZ-P4.</u></b>
4	Part 2: District-Wide Matters/General District-Wide Matters/Noise: Introductory Section (Exemptions)	Support	RCNZ supports the following exemptions to the Noise rules and standards: 2. <i>Vehicles being driven on a road (within the meaning of section 2(1) of the Transport Act 1998), or within a site as part of or compatible with a normal residential activity;...</i> 7. <i>Farming activity, agricultural vehicles, machinery or equipment used on a seasonal or intermittent basis for primary production in the Rural Zones;</i>	Retain the following exemptions to the Noise rules and standards: 2. <i>Vehicles being driven on a road (within the meaning of section 2(1) of the Transport Act 1998), or within a site as part of or compatible with a normal residential activity;...</i> 7. <i>Farming activity, agricultural vehicles, machinery or equipment used on a seasonal or intermittent basis for primary production in the Rural Zones;</i>
5	Part 4: Appendices and Schedules/Appendices/APP1: Permitted Noise Standards	Support in part	The General Rural Zone permitted noise standards should apply at or within the “notional boundary” of a “noise sensitive activity” not at or within the boundary of any site within the receiving zones.	Amend the introductory note in APP1 – Permitted Noise Standards as follows: <b><u>Note: The tables below provide the permitted noise limits for noise generated from activities undertaken within zones as measured at or within the boundary of any site within the receiving zones (with the exception of the General Rural Zone where the permitted noise limit is measured at or within the notional boundary).</u></b>