

FORM 5

**RURAL CONTRACTORS NEW ZEALAND SUBMISSION ON PROPOSED TE TAO O POUTINI PLAN**

Clause 6 of Schedule 1, Resource Management Act 1991

**To:** Proposed Te Tai o Poutini Plan Submissions  
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**Submitter:** Rural Contractors New Zealand Incorporated (“**RCNZ**”)

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This is a submission on the Proposed Te Tai o Poutini Plan.

RCNZ wishes to be heard in support of this submission.

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

If others make a similar submission, RCNZ would consider presenting a joint case with them at any Hearing.

## 1 General

- 1.1 Rural Contractors New Zealand Incorporated (“**RCNZ**”) generally supports the Proposed Te Tai Poutini Plan subject to the specific amendments sought in this submission (refer **Attachment A**).
- 1.2 In the submission points set out in **Attachment A**, RCNZ is seeking to ensure that the Te Tai Poutini Plan provides a more enabling planning framework that better recognises and provides for the establishment and ongoing operation of rural contractor depots (and associated activities) as critical rural activities which support, service or are dependent on primary production and have an operational need to locate in rural areas (including within areas of “highly productive land”). In this regard, a rural contractor depot would fall within the ambit of the National Planning Standards definition for “*rural industry*”<sup>1</sup>.
- 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. Rural 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;

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<sup>1</sup> The National Planning Standards definition for “*rural industry*” is “*...an industry or business undertaken in a rural environment that directly supports, services, or is dependent on primary production*”.

- 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 Te Tai Poutini Plan.

## 2 Specific Submission Points

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

**Signature** RURAL CONTRACTORS NEW ZEALAND INCORPORATED  
By its authorised agents Mitchell Daysh Limited



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**Date** 11 November 2022

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**ATTACHMENT A: RURAL CONTRACTORS NEW ZEALAND - SUBMISSION ON PROPOSED TE TAI O POUTINI PLAN**

Provision	Support / Oppose	Reasons	Decision Sought
<b>Definitions - Ngā Tautuhinga</b>			
New definition for “rural contractor depot”	NA	The definition of “ <i>rural industry</i> ” would include a rural contractor depot because it is “ <i>an industry or business undertaken in a rural environment that directly supports, services, or is dependent on primary production</i> ”. 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-R21 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-R21). To assist with the implementation of the proposed new permitted activity rule, RCNZ seeks the introduction of a definition for “ <i>rural contractor depot</i> ” in the Definitions section.	Include the following definition for “ <i>Rural contractor depot</i> ”:  <i>The land and buildings used for the purposes of storing or maintaining machinery, equipment and associated goods and supplies associated with a rural contracting business that directly supports, services or is dependent on primary production.</i>
<b>AG – Agriculture – Te Ahuwhenua</b>			
Agriculture Strategic Objectives Objective AG – O2	Support	Objective AG – O2 states the following:  <i>To recognise the significance of agriculture to the West Coast economy, provide for agricultural development and innovation and enable the support industries and services needed to maintain agricultural viability within rural areas.</i>  RCNZ supports this objective on the basis of the importance of ensuring the District Plan enables support industries and services (such as rural contracting) to maintain agricultural viability within the West Coast.	Retain as notified.
<b>RURZ – Rural Zones – Nga Takiwa Tuawhenua</b>			
Rural Zones – Objectives and Policies Overview	Support in part	The sixth paragraph of the Overview states that one of the key points to note regarding Rural Zones is the strategic direction for AG – Agriculture is to “ <i>maintain productive values and maintain agricultural viability</i> ”. This statement does not adequately reflect Objective AG – O2 which also emphasises the importance of ensuring the District Plan enables support industries and services (such as rural contracting) to maintain agricultural viability within the West Coast.	Amend the sixth paragraph of the Overview as follows:  <i>Key points to note are:</i> <ul style="list-style-type: none"> <li><i>The strategic direction for AG – Agriculture to maintain productive values and maintain agricultural viability (including through enabling support industries and services).</i></li> </ul>
Rural Zones – Objectives and Policies Overview	Support in part	The seventh paragraph of the Overview section states primary production uses are the major activities within the GRUZ – General Rural Zone. Consistent with the strategic policy direction in Objective AG – O2 and Policy RURZ – P6, an amendment is sought to ensure that it is appropriately recognised that the GRUZ – General Rural Zone includes rural support industries and services (such as rural contracting) because of their significance to primary production activities and maintaining agricultural viability within the West Coast.	Amend the seventh paragraph of the Overview as follows:  <i>There are three RURZ - Rural Zones on the West Coast/Te Tai o Poutini - the GRUZ - General Rural Zone, the RLZ - Rural Lifestyle Zone and the SETZ - Settlement Zone.</i> <ul style="list-style-type: none"> <li><i>The GRUZ - General Rural Zone covers much of the land on the West Coast/Te Tai o Poutini where primary production uses are the major activities (along with rural support industries and services). There are two Precincts within the Zone - GRUZ - PREC1 - Community Living Precinct and GRUZ - PREC5 - Highly Productive Land Precinct.</i></li> </ul>
Rural Zones – Objectives and Policies	Support	Policy RURZ – P6 states the following:	Retain Policy RURZ – P6

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Policy RURZ - P6		<p>Recognise that the rural areas may be the most appropriate location for some utility, industrial or commercial uses to establish, where these have a functional relationship with rural areas, provided the character and amenity of the rural areas is maintained and adverse effects are managed.</p> <p>RCNZ supports this policy on the basis that it appropriately recognises that some activities have a functional need to be located within rural areas (e.g. rural contractor depots) because of the direct service provided to surrounding primary production activities.</p>	
<b>GRUZ – General Rural Zone – Te Takiwa Tuawhenua Whanui</b>			
<p>General Rural Zone Rules - Permitted Activities</p> <p>New permitted activity rule for “Rural Contractor Depot”</p>	NA	<p>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-R21 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 permitted activity rule in the General Rural Zone permitting small-scale rural contractor depots (with a consequential amendment to Rule GRUZ-R21 so that it does not apply to rural contractor depots). RCNZ is also seeking a new restricted discretionary activity rule for a rural contractor depot that cannot comply with the proposed new permitted activity rule. To assist with implementation of the proposed new rules, RCNZ is also seeking the introduction of a definition for “rural contractor depot” (in the Definitions section).</p>	<p>Include the following new permitted activity rule:</p> <p><b><u>GRUZ – R14A Rural Contractor Depot Activity Status Permitted</u></b></p> <p><i>Where:</i></p> <ol style="list-style-type: none"> <li>All performance standards for Rule GRUZ - R1 are complied with.</li> <li>The maximum number of staff is 7 (other than persons living on the site).</li> <li>The rural contractor depot (including associated vehicle access, parking and manoeuvring areas) is set back at least 50m from any existing sensitive activity.</li> </ol> <p><b><u>Activity status where compliance not achieved: Restricted Discretionary</u></b></p>
<p>General Rural Zone Rules – Restricted Discretionary Activities</p> <p>New restricted discretionary activity rule for “Rural Contractor Depot”</p>	NA	<p>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-R21 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 permitted activity rule in the General Rural Zone permitting small-scale rural contractor depots (with a consequential amendment to Rule GRUZ-R21 so that it does not apply to rural contractor depots). RCNZ is also seeking a new restricted discretionary activity rule for a rural contractor depot that cannot comply with the proposed new permitted activity rule. To assist with implementation of the proposed new rules, RCNZ is also seeking the introduction of a definition for “rural contractor depot” (in the Definitions section).</p>	<p>Include the following new restricted discretionary activity rule:</p> <p><b><u>GRUZ – R26A Rural Contractor Depot not meeting Permitted Activity Standards</u></b></p> <p><b><u>Activity Status Restricted Discretionary</u></b></p> <p><b><u>Discretion is restricted to:</u></b></p> <ol style="list-style-type: none"> <li>Bulk and location of buildings;</li> <li>Management of access, traffic and parking;</li> <li>Management of noise, lighting and dust;</li> <li>Landscape measures;</li> <li>Methods of water supply, wastewater and stormwater treatment and disposal; and</li> <li>Any requirement for financial contributions.</li> </ol> <p><b><u>Activity status where compliance not achieved: N/A</u></b></p>
GRUZ–R21 – Rural Industry	Oppose in part	<p>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-R21 regardless of scale and associated environmental effects. In many cases, small-scale rural contractor depots</p>	<p>Amend GRUZ-R21 – Rural Industry as follows:</p> <p><b><u>GRUZ – R21 Rural Industry (excluding a Rural Contractor Depot)</u></b></p> <p><b><u>Activity Status Restricted Discretionary</u></b></p> <p><i>Where:</i></p>



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		<p>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 permitted activity rule in the General Rural Zone permitting small-scale rural contractor depots (with a consequential amendment to Rule GRUZ-R21 so that it does not apply to rural contractor depots). RCNZ is also seeking a new restricted discretionary activity rule for a rural contractor depot that cannot comply with the proposed new permitted activity rule. To assist with implementation of the proposed new rules, RCNZ is also seeking the introduction of a definition for “rural contractor depot” (in the Definitions section).</p>	<p>1. All performance standards for Rule GRUZ - R1 are complied with.</p> <p><b>Discretion is restricted to:</b></p> <ul style="list-style-type: none"> <li>a. Bulk and location of buildings;</li> <li>b. Management of access, traffic and parking;</li> <li>c. Management of odour, noise, lighting and dust;</li> <li>d. Hours of operation</li> <li>e. Landscape measures;</li> <li>f. Any requirement for financial contributions;</li> <li>g. Any impacts on the production values of the surrounding land;</li> <li>h. Effects on visual amenity and rural character; and</li> <li>i. Methods of water supply;</li> <li>j. Methods of wastewater and stormwater treatment and disposal.</li> </ul>

