

11 August 2023

Hearings Panel
Proposed Plan Change 42 to the Taupo District Plan

By Email: districtplan@taupo.govt.nz

Dear Commissioners

RE: Submitter OS109 Rural Contractors New Zealand Incorporated - Proposed Plan Change 42 (General Rural and Rural Lifestyle Environments) to the Taupo District Plan

Rural Contractors New Zealand Incorporated (“RCNZ”) lodged submissions in relation to Proposed Plan Change 42 (General Rural and Rural Lifestyle Environments) to the Taupo District Plan (“PC42”).

RCNZ generally supported the PC42 provisions subject to appropriate amendments within the definitions section, and policy framework and rules and standards within the General Rural Environment to provide greater certainty that there was differentiation between “*rural industry*” and the much broader “*commercial and industrial activity*”. The changes sought were consistent with the general policy direction of PC42 which seeks to enable rural industry within the General Rural Environment whilst avoiding general commercial and industrial activities that do not have a locational need (e.g. Objective 3b.2.3 and Policy 3b.2.19). Key changes sought included:

- Replacing the PC42 definition for “*rural industry*” with the National Planning Standards (“NPS”) definition (as required by the NPS) (submission point OS109.1)
- Retaining Objective 3b.2.3 (Rural industry) and Policy 3b.2.9 (Maintaining the established character) on the basis that rural industry is enabled within the General Rural Environment and associated buildings are recognised as part of the General Rural Environment character (submission points OS109.2 & OS109.3);
- Amending Policy 3b.2.14 (Commercial and industrial activity) to provide full certainty that it does not apply to rural industry (submission point OS109.4);
- Amending Rule 4b.1.5 (commercial and industrial activities, and home businesses) to provide full certainty that it does not apply to “*rural industry*” (particularly given that Rule 4b.1.10 provides for “*rural industry*”) (submission point OS109.5); and

- Amending Performance Standard 4b.2.8 (Commercial and industrial activities, and home businesses) to provide full certainty that the 100m² maximum gross floor area and land area requirements do not apply to “rural industry” (submission point OS109.8).

In terms of Rule 4b.1.10 (Intensive indoor primary production and rural industry), RCNZ supported the permitted activity status of rural industry (that complied with the specified performance standards), and the restricted discretionary activity status of larger scale rural industry that did not comply. However, RCNZ sought deletion of the second (shorter) “*matters of discretion*” list to avoid unnecessary duplication and provide greater certainty (submission point OS109.6).

The Section 42A Report recommends accepting the various changes sought in RCNZ’s submission outlined above on the basis that they provide greater certainty, address drafting errors and better reflect the intent of PC42.

In terms of Performance Standard 4b.2.1 (Vehicle movements), RCNZ sought an amendment to 4b.2.1(i) to provide greater certainty that the permitted limit of 200 “*equivalent vehicle movements per day for the allotment*” does not contradict the District Plan definition for “*equivalent vehicle movements*” which is “*the number of movements a vehicle makes to and from a site per day, averaged over a week over normal operation, measured in a light vehicle equivalent movement...*” (submission point OS109.7). RCNZ sought removal of the “*per day*” requirement in Performance Standard 4b.2.1(i) because it is already contained within the definition for “*equivalent vehicle movements*” (on the basis that any such vehicle movements are averaged over a week of normal operation). The S42A Report considers the wording of Performance Standard 4b.2.1(i) is necessary and appropriate because it needs to be read in conjunction with the definition for “*equivalent vehicle movements*” which states the means of calculation (including the averaging methodology). RCNZ accepts the S42A Report explanation for retaining the current wording of Performance Standard 4b.2.1(i).

Overall, RCNZ wishes to table support for the relevant s42A recommendations in relation to all their submissions on PC42 and will not be filing any evidence.

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

Yours sincerely



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