

**RURAL CONTRACTORS NEW ZEALAND SUBMISSION
PROPOSED NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT CAPACITY**

To: NPS Urban Development Capacity
Ministry for the Environment
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1 INTRODUCTION

1.1 Rural Contractors New Zealand Incorporated ("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.

1.2 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.

1.3 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.

1.4 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.

1.5 Rural contractors are critical in ensuring the prosperity, security, and sustainability of New Zealand's pastoral, horticultural 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 rural production activities (including associated rural services such as rural contracting depots) are sufficiently recognised, provided for and protected for future generations in terms of key planning documents such as the Proposed National Policy Statement on Urban Development Capacity.

2 SPECIFIC SUBMISSIONS AND RELIEF SOUGHT

2.1 Specific submissions and relief sought are addressed in the table below.

Signature: **RURAL CONTRACTORS NEW ZEALAND INC.**
by its authorised agents Environmental Management Services Ltd

A handwritten signature in black ink, appearing to read 'G.J. Mathieson', written in a cursive style.

G.J. Mathieson

Date: 14th July 2016

REF	PROVISION	SUPPORT OPPOSE	SUBMISSION	RELIEF SOUGHT
SECTION 3 INTERPRETATION				
1	New definition for “highly versatile soils”	Support in part	RCNZ has sought changes to the policy framework so that where possible, “highly versatile soils” are protected from urban expansion for continued rural productive use, and seeks an appropriate definition.	Include the following new definition for “highly versatile soils”: <i>Land classified as Land Use Capability I or II in the New Zealand Land Resource Inventory.</i>
2	New definition for “rural production activities”	Support in part	RCNZ has sought changes to the policy framework so that where possible, “rural production activities” are protected from urban expansion (including reverse sensitivity effects), and seeks an appropriate definition.	Include the following definition for “rural production activities”: <i>“Rural land use activities that rely on the productive capacity of land or have a functional need for a rural location such as agriculture, pastoral farming, dairying, poultry farming, pig farming, horticulture, forestry, quarrying and mining. Also included in this definition are rural service, processing and research facilities that directly service or support those rural land use activities.”</i>
SECTION 6 POLICIES				
3	Policy PD2	Support in part	<p>Policy PD2 states the following:</p> <p><i>A local authority must consider all options available to it under the Act to enable sufficient development capacity to meet residential and business demand, including but not limited to:</i></p> <ul style="list-style-type: none"> • <i>Changes to plans and regional policy statements, including changes to: <ul style="list-style-type: none"> ○ Objectives, policies and rules, zoning and the application of those in both existing urban and undeveloped areas; ○ Activity status; ○ Provisions about the notification of applications for resource consent; ○ Existing overlays, or the introduction of overlays which enable development; and ○ Make them simpler to interpret. </i> • <i>Consenting processes that are customer-focused and coordinated within the local authority; and</i> 	<p>After Policy PD2, introduce the following new Policy PD2(1):</p> <p><i>When considering changes to plans and regional policy statement to enable sufficient development capacity to meet residential and business demand (in accordance with Policy PD2), local authorities must avoid highly versatile soils and reverse sensitivity effects on rural production activities (unless it can be demonstrated that here is no other suitable land adjacent to existing urban areas).</i></p>

REF	PROVISION	SUPPORT OPPOSE	SUBMISSION	RELIEF SOUGHT
			<p>RCNZ supports Policy PD2 on the basis that it is prudent to require local authorities to provide further development capacity if such capacity is insufficient within existing urban areas. However, it is considered that additional policy direction is required to ensure that rural production activities are adequately protected if possible. This can be achieved through requiring that <i>“highly versatile soils”</i> (the best farming soils) are generally only used for urban expansion where there is no other suitable land available adjacent to existing urban areas, and that the avoidance of reverse sensitivity effects on existing <i>“rural production activities”</i> should be a key consideration. Definitions for <i>“highly valued soils”</i> and <i>“rural production activities”</i> are proposed in that part of this submission relating to the Glossary.</p>	