

## Submission on Waimakariri District Council - Proposed District Plan

### Form 5 Submission on publically notified proposal for policy statement or plan, change or variation

*Clause 6 of Schedule 1, Resource Management Act 1991*

To: Waimakariri District Council - Development Planning Unit

Date received: 26/11/2021

Submission Reference Number #:129

This is a submission on the following proposed plan (the **proposal**): Waimakariri District Council - Proposed District Plan

**Address for service:**

Scottville Farm [REDACTED]  
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New Zealand  
Email: rick@scottvillefarm.co.nz

**I wish to be heard:** No

**I am willing to present a joint case:** No

Could you gain an advantage in trade competition in making this submission?

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Are you directly affected by an effect of the subject matter of the submission that

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

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## Submission points

### Point 129.1

**Section:** GRUZ - General Rural Zone

**Sub-section:** Activity Rules

**Provision:**

**GRUZ-R11 Rural industry**

**Activity status:** PER

**Activity status when compliance with GRUZ-R11 (6) or (9)  
not achieved:** RDIS

Where:	<b>Matters of discretion are restricted to:</b>
<ol style="list-style-type: none"> <li>1. a maximum of five staff shall work on the site at any one time;</li> <li>2. the manufacture, processing or production of goods involves initial or further processing of commodities derived from primary production;</li> <li>3. the maximum GFA occupied for the rural industry shall be 250m<sup>2</sup>;</li> <li>4. the maximum GFA occupied for the rural industry within a SASM shall be 150m<sup>2</sup>;</li> <li>5. the maximum land area occupied for the rural industry shall be 500m<sup>2</sup>;</li> <li>6. any retail sales area shall be set back a minimum of 10m from the site boundary;</li> <li>7. the retail sale of goods on the site is restricted to those manufactured, produced or processed on the site;</li> <li>8. the maximum NFA or land area occupied for retail sales shall be 50m<sup>2</sup>; and</li> <li>9. any buildings, yard, storage, or parking areas associated with the activity shall not be located within 60m of any residential unit, or other sensitive activity, located on a site other than where the rural industry is occurring.</li> </ol>	<p>RURZ-MD1 - Natural environment values  RURZ-MD3 - Character and amenity values of the activity  RURZ-MD5 - Rural sales</p> <p><b>Activity status when compliance with GRUZ-R11 (4) not achieved: RDIS</b></p> <p><b>Matters of discretion are restricted to:</b></p> <p>SASM-MD1 - Wāhi tapu and wāhi taonga  SASM-MD2 - Ngā tūrangā tūpuna</p> <p><b>Notification</b></p> <p>An application for a restricted discretionary activity under GRUZ-R11 (4) is precluded from being publicly notified, but may be limited notified only to Te Ngāi Tuāhuriri Rūnanga</p> <p><b>Activity status when compliance with GRUZ-R11 (1) to (3), (5), (7) or (8) not achieved: DIS</b></p>

#### Advisory Note

- It is recommended that operators of a rural industry inform owners/occupiers of adjacent sites prior to commencing the activity.

**Sentiment:** Oppose

#### Submission:

Scottville Farm is concerned about the following proposed rules:

The maximum of 5 staff under **GRUZ-R11(sub clause 1)** is insufficient for any rural industry activity. It has been long know that the handling/packing/processing etc. of primary production, particularly horticulture is very labor intensive. 5 staff would be the minimum you would need not the maximum. It would be accentuated in smaller operations where the investment of automation is not economically viable.

**The relief/outcome we seek is the maximum be increased from 5 to 15 staff.**

The GFA under **GRUZ-R11 (sub clause 3)** should be increased to 550m2 to align itself with the GFA in the section **GRUZ-BFS6** My concern is the processing of primary production goods require larger equipment, and handling equipment i.e. forklifts. It is a **high risk health and safety issue** when compacting a lot equipment into smaller buildings/sheds and then incorporating 1,2 or even 3 forklifts.

**The relief/outcome we seek is the GFA be increased from 250m2 to 550m2.**

Subsequently **GRUZ-R11 (sub clause 5)** should be increased to 5000m2. Fresh produce is a very bulky product. A small production are i.e. 10 or 15ha requires a lot of bins and storage area. If the product is exported there can be area needed for up to 8+ shipping containers. To give an example: 1ha of onions can produce 80tons of product which is 3x 40ft shipping containers or 80x 2 cubic meter produce bins.

**The relief/outcome we seek is the maximum land area occupied for the rural industry is increased to 5000m2**

Scottville Farm has great overall support for the purpose, objectives and policies in the proposed plan, but we do sincerely feel that **GRUZ-R11** rules should be more generous and practical.

Sincerely  
Rick Larsen

**Relief sought**

**GRUZ-R11(sub clause 1) - The relief/outcome we seek is the maximum be increased from 5 to 15 staff.**

**GRUZ-R11 (sub clause 3) - The relief/outcome we seek is the GFA be increased from 250m2 to 550m2.**

**GRUZ-R11 (sub clause 5) - The relief/outcome we seek is the maximum land area occupied for the rural industry is increased to 5000m2**