

Timaru District Council

Summary of Decisions Requested

BY SUBMITTER

PROPOSED TIMARU DISTRICT PLAN

4 MARCH 2024

Document 2 of 4

User Guide

This summary includes revisions to the wording of a number of the summaries of submissions previously publicly notified made on the Timaru proposed district plan, and to the wording of the relief sought in those submissions. Where there has been a substantive change made to any summary, or to the decision requested, or to the plan provision that a submission has been coded to, these submissions have been identified with a blue fill background. No substantive changes have been made to any of the summaries, the decisions requested or any part of a submission point summary where the background remains white.

Where amendments to a provision have been sought by a submitter, red underlined text has been used to indicate recommended additions to the provision and ~~red strikethrough~~ to indicate recommendations for the removal of the proposed text.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.24	Definitions	Definitions	Maintenance	Supports but notes the definition of maintenance is different in the exposure draft NPS-IB in regard to maintenance of biodiversity.	Retain as notified.
Royal Forest and Bird Protection Society	156.25	Definitions	Definitions	Mining	Not specified.	Retain as notified.
Royal Forest and Bird Protection Society	156.26	Definitions	Definitions	Operational need	Not specified.	Retain as notified.
Royal Forest and Bird Protection Society	156.27	Definitions	Definitions	Regionally Significant Infrastructure	Considers the definition to be overly broad and could lead to more than minor effects from these activities. For example, new community land infrastructure, potable water systems and transport hubs could have effects. The RSI provisions should only avail themselves for those activities that are established in the same way as established irrigation.	Amend Regionally Significant Infrastructure definition as follows: <ul style="list-style-type: none"> a. <i>Strategic land transport network and arterial roads</i> b. <i>Timaru Airport</i> c. <i>Port of Timaru</i> d. <i>Telecommunication facilities</i> e. <i>National, regional and local renewable electricity generation activities of any scale</i> f. <i>The National Grid electricity transmission network</i> g. <i>Established Sewage collection, treatment and disposal networks</i> h. <i>Established Community land drainage infrastructure</i> i. <i>Established Community potable water systems</i> j. <i>[...]</i> k. <i>Established Transport hubs</i> l. <i>Bulk fuel supply infrastructure including terminals, wharf lines and pipelines.</i>
Royal Forest and Bird Protection Society	156.28	Definitions	Definitions	Replacement	Neutral position on this definition.	Retain as notified.
Royal Forest and Bird Protection Society	156.29	Definitions	Definitions	Riparian Margin	Neutral position on this definition.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.30	Definitions	Definitions	Riparian Zone [in relation to a river or lake]	Neutral position on this definition.	Retain as notified.
Royal Forest and Bird Protection Society	156.31	Definitions	Definitions	Sensitive environment	Considers Sensitive Environment should reflect areas that are important to highly mobile species.	Amend the definition of Sensitive Environment to include identified areas important for highly mobile species.
Royal Forest and Bird Protection Society	156.32	Definitions	Definitions	Significant Natural Area or SNA	Considers that it is possible that not all SNAs have been identified, assessed, and mapped as SNA, hence the definition shouldn't be limited to the mapped areas only.	Amend Significant Natural Area or SNA as follows: <i>Means identified areas of significant indigenous vegetation and significant habitats of indigenous fauna, as set out in ECO-SCHED 2, and shown on the planning maps; <u>or any area that meets the APP5 - Criteria for identifying Significant Natural Areas.</u></i>
Royal Forest and Bird Protection Society	156.33	Definitions	Definitions	Upgrading / Upgrade	Not specified.	Retain as notified.
Royal Forest and Bird Protection Society	156.34	VS - Versatile Soils	General	General	Notes that the PDP presumably does not reflect the NPS-Highly Productive Land as it predates the NPS and considers it should reflect the NPS.	Amend the definition of Versatile Soils to reflect NPS-HPL. [see related submission point on Versatile Soils Chapter].
Royal Forest and Bird Protection Society	156.35	SD - Strategic Direction	Introduction	General	Not specified.	Retain as notified.
Royal Forest and Bird Protection Society	156.36	SD - Strategic Direction	Interpretation	For plan development, including plan changes	Supports the approach that there is no hierarchy between strategic objectives in this chapter and other objectives and policies of the District Plan. Also supports the approach to plan implementation and resource consents.	Retain approach as notified.
Royal Forest and Bird Protection Society	156.37	SD - Strategic Direction	Objectives	SD-O1 Residential Areas and Activities	Not specified.	Retain as notified.
Royal Forest and Bird Protection Society	156.38	SD - Strategic Direction	Objectives	SD-O2 The Natural and Historic Environment	Considers the Historical and Cultural Values are separated from Natural Environmental Values in the Plan, hence separate objectives is more appropriate. Also considers the contribution that historic heritage to the district should be recognised.	Amend SD-O2 The Natural and Historic Environment by: 1. creating a separate objective for the Historic Environment; and 2. that the contribution that Historic Heritage makes to the District.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.39	SD - Strategic Direction	Objectives	SD-O3 Climate Change	Considers the objective should ensure that native species can be enabled to adapt to climate change by ensuring that there is room for native species to retreat if necessary. Additionally considers that the strategic direction could be strengthened by setting out how the Plan will have regard to the emissions reduction plan and the national adaptation plan.	Add a new objective that relates to Historic Heritage and its contribution to the district.
Royal Forest and Bird Protection Society	156.40	SD - Strategic Direction	Objectives	SD-O4 Natural Hazards	Considers the objective should ensure that natural hazard risks to native species and habitat are identified and appropriately mitigated.	Amend SD-O4 Natural Hazards to ensure that risks of natural hazards to native species and habitat, are avoided or appropriately mitigated by either: 1. amend clause (ii); OR 2. add another clause.
Royal Forest and Bird Protection Society	156.41	SD - Strategic Direction	Objectives	SD-O5 Mana Whenua	Not specified.	Not specified.
Royal Forest and Bird Protection Society	156.42	SD - Strategic Direction	Objectives	SD-O6 Business Areas and Activities	Not specified.	Not specified.
Royal Forest and Bird Protection Society	156.43	SD - Strategic Direction	Objectives	SD-O7 Centres	Not specified.	Not specified.
Royal Forest and Bird Protection Society	156.44	SD - Strategic Direction	Objectives	SD-O8 Infrastructure	Considers that emissions reduction should be incorporated in the objective.	Amend SD-O8 Infrastructure as follows: <i>Across the District:</i> i. <i>improved accessibility, reduced emissions and multimodal connectivity is provided through a safe and efficient transportation network that is able to adapt to technological changes;</i> [...]

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.45	SD - Strategic Direction	Objectives	SD-O9 Rural Areas	Considers the objective should integrate the protection and maintenance of indigenous biodiversity into the rural area.	Amend SD-O9 Rural Areas as follows: <i>A range of primarily productive activities are enabled in the rural environment to enable the ongoing use of land for primary production for present and future generations, while:</i> <i>i.</i> <i>[...]</i> <i>vii. <u>Protecting and maintaining indigenous biodiversity in rural areas</u></i>
Royal Forest and Bird Protection Society	156.46	SD - Strategic Direction	Objectives	SD-O10 Community and Open Space	Not specified.	Not specified.
Royal Forest and Bird Protection Society	156.47	UFD - Urban Form and Development	Objectives	UFD-O1 Settlement Patterns	Considers that while it is appropriate to reduce adverse effects on the environment under UFD-O1.iii, it is also important to manage effects.	Amend UFD-O1 Settlement Patterns as follows: <i>A consolidated and integrated settlement pattern that:</i> <i>i. Efficiently accommodates future growth [...];</i> <i>ii. It is integrated with the efficient use of infrastructure;</i> <i>iii. Reduces <u>and manages</u> adverse effects on the environment, including energy consumption, carbon emissions and water use;</i>
Royal Forest and Bird Protection Society	156.48	UFD - Urban Form and Development	Objectives	New	Also considers adverse effects that remain after they are reduced through a consolidated and integrated settlement pattern should also apply the mitigation hierarchy in accordance with other provisions of the plan.	Add a new objective to the UFD - Urban Form and Development Chapter as follows: <u>UFD-OX</u> <u>Avoids, remedies, or mitigates adverse effects consistent with the provisions of the plan.</u>
Royal Forest and Bird Protection Society	156.49	EI - Energy and Infrastructure	General	General	Considers the provisions in this chapter do not give effect to the NZCPS, particularly 'the avoid directives' in policies 11, 13 and 15. Nor is this the case in combination with other chapters.	Amend EI - Energy and Infrastructure Chapter and of other chapters to give effect to the NZCPS.
Royal Forest and Bird Protection Society	156.50	EI - Energy and Infrastructure	General	General	The submitter considers that all provisions in other chapters which give effect to the NZCPS must apply to activities provided for in the EI rules, however this does not appear to be possible under the matters of discretion identified. Nor is it clear that objectives and policy of other chapters, could be adequately considered where consent is required given the wording of provisions in this chapter. The reference "unless otherwise specified" creates uncertainty and appears to be superfluous as there appear to be no such specifications in the chapter.	Amend the objectives and policies of the EI - Energy and Infrastructure to avoid conflicts with other chapters addressing s6 RMA matters and giving effect to the NZCPS.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.51	EI - Energy and Infrastructure	Introduction	General	Considers the introduction is not necessarily accurate, given the provisions do not give effect to the NZCPS. The reference to chapters “cross referenced below” can be removed, as none are listed, and listing could exclude chapters that are relevant.	Amend EI - Energy and Infrastructure introduction as follows: ... [first paragraph] <i>Regionally Significant Infrastructure and other infrastructure have important functions and enable people and communities to provide for their social, economic and cultural wellbeing. The positive effects of Regionally Significant Infrastructure and other infrastructure may be realised locally, regionally or nationally. However, they can also have adverse effects, especially on sensitive environments. <u>In managing the effects of Regionally Significant Infrastructure and other infrastructure the provisions including rules for Overlays, the ECO, NATC, NFL and CE chapters also apply.</u></i> ... [second paragraph] <i>With reference to Part 1 - National Direction Instruments, the provisions in this chapter (in combination with the other chapters cross-referenced below):</i>
Royal Forest and Bird Protection Society	156.52	EI - Energy and Infrastructure	Objectives	EI-O1 Regionally Significant Infrastructure	Considers the objective should incorporate emissions reduction.	Amend EI-O1 Regionally Significant Infrastructure as follows: <i>Effective, resilient, efficient and safe Regionally Significant Infrastructure and Lifeline utilities that:</i> <ol style="list-style-type: none"> 1. provides essential and secure services, including in emergencies; and 2. facilitates local, regional, national or international connectivity; and 3. contributes to the economy, <u>emissions reduction</u>, and supports a high standard of living; and 4. is aligned and integrates with the timing and location of urban development; and 5. enables people and communities to provide for their health, safety and wellbeing.
Royal Forest and Bird Protection Society	156.53	EI - Energy and Infrastructure	Objectives	EI-O2 Adverse effects of Regionally Significant Infrastructure	Opposes an objective that is contrary to the s6 and the NZCPS.	Delete EI-O2 Adverse effects of Regionally Significant Infrastructure.
Royal Forest and Bird Protection Society	156.54	EI - Energy and Infrastructure	Objectives	EI-O3 Adverse effects of other infrastructure	Opposes an objective that is contrary to the s6 and the NZCPS. The reference to “identified” characterises and values is not appropriate as these matters are not identified in the appendix or schedules for most “sensitive environments” and values may not remain constant.	Delete EI-O3 Adverse effects of other infrastructure.
Royal Forest and Bird Protection Society	156.55	EI - Energy and Infrastructure	Objectives	EI-O4 Adverse effects on Regionally Significant Infrastructure and Lifeline Utilities	Considers that the objective goes too far and should be limited to existing or authorised RSI and lifeline utilities.	Oppose.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.56	EI - Energy and Infrastructure	Objectives	EI-O5 Amateur radio configurations	Considers that no adverse effects is preferable as some adverse effects are to be avoided, for example under the NZCPS.	Amend EI-O5 Amateur radio configurations as follows: <i>Amateur radio configurations are able to be efficiently established with <u>no to</u> minimal adverse effects on the surrounding Environment.</i>
Royal Forest and Bird Protection Society	156.57	EI - Energy and Infrastructure	Policies	EI-P1 Recognising the benefits of Regionally Significant Infrastructure and Lifeline Utilities	<p>Considers the policy contrary to NPSET and NPSREG as the policy as drafted is more enabling than these national directions.</p> <p>Considers the Council should be supporting rather than encouraging and using the same terminology as the NPS's.</p> <p>The submitter also believes it is inappropriate to allow for "non-renewable" electricity generation, when it is not clear how this fits within the definition of RSI or Lifeline utility.</p>	<p>Amend EI-P1 Recognising the benefits of Regionally Significant Infrastructure and Lifeline Utilities as follows:</p> <ol style="list-style-type: none"> 1. <u>enabling-providing for</u> their operation, maintenance, repair, upgrade, development <u>in appropriate locations</u>; and 2. <u>enabling providing for</u> their removal during an emergency; and 3. <u>recognising their functional needs or operational needs</u>; and 4. <u>encouraging supporting</u> the coordination of their planning and delivery with land use, subdivision, development, and urban growth so that future land use and infrastructure and Lifeline Utilities are integrated, efficient and aligned; and 5. <u>enabling providing for</u> the investigation and development of new small-scale renewable electricity generation activities to support a reduction in greenhouse gas emissions and diversifying the type and/or location of electricity generation; and 6. <u>allowing providing for</u> large scale renewable generation <u>and non-renewable generation</u> activities where the adverse effects can be minimised r able to be remediated; and 7. supporting Regionally Significant Infrastructure in adopting new technologies that: <ol style="list-style-type: none"> a. improve access to, and efficient use of, networks and services; b. allow for the re-use of redundant services and structures <u>and construction materials</u>; c. increase resilience, safety or reliability of networks and services; d. <u>avoid adverse environmental effects and</u> result in environmental benefits <u>and enhancements</u>; or e. promote environmentally sustainable outcomes including green infrastructure and the increased utilisation of renewable resources.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.58	EI - Energy and Infrastructure	Policies	EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure	Opposes EI-P2 as it does not achieve Part 2 of the Act. More clarity to be provided in the policy to distinguish those activities that have specific national policy direction by splitting the policy into separate clauses or provide separate policies. There are also conflicts within the policy. [Refer to original submission for full reason].	Delete EI-P2 Regionally Significant Infrastructure and replace with wording that: 1. requires that for National Grid and Renewable electricity generation activities, adverse effects: a. in the coastal environment are avoided in accordance with Policies 11, 13 15 and the NZCPS; b. in all other cases are firstly sought to be avoid, where this is not possibly due to functional and operational needs, adverse effects are remedied or mitigated; c. where there is no functional or operational need upgrading and development does not occur within an overlay or area meeting the significance criteria in the RPS; 2. For RSI (other than national Grid and Renewable) requires adverse effects: a. in the coastal environment are avoided in accordance with Policies 11, 13 15 and the NZCPS; b. outside the coastal environment that are significant adverse effects on natural of the coastal environment, wetlands, and the margins lakes and rivers, outstanding natural landscapes, and features, and SNAs (including any unscheduled area meeting the significance criteria in the RPS) to be avoided; c. in all other cases are firstly sought to be avoid, where this is not possibly due to functional and operational needs, adverse effects are remedied or mitigated; d. where there is no functional or operational need upgrading and development does not occur within an overlay. 3. For “other infrastructure” effects are to be addressed in accordance with the ECO, NATC, NFL and CE and any other relevant chapters.
Royal Forest and Bird Protection Society	156.59	EI - Energy and Infrastructure	Policies	EI-P3 Adverse effects on Regionally Significant Infrastructure	Supports the provision for maintenance providing adverse effects on the environment are avoided, remedied, and mitigated as appropriate when considering maintenance for existing and for new development.	1. Retain EI-P3.2 as being limited to the national grid; AND 2. Amend rules or standards as necessary to ensure adverse effects on the environment are avoided, remedied, and mitigated as appropriate when considering maintenance for existing and for new development of the National Grid.
Royal Forest and Bird Protection Society	156.60	EI - Energy and Infrastructure	Policies	EI-P4 Amateur radio configurations	Considers the word ‘minimise’ is uncertain as to the extent to which adverse effects will be avoided, remedied, or mitigated which creates inconsistencies with the NZCPS and other plan provisions.	Amend EI-P4 Amateur radio configurations as follows: 1. [...] 2. Only allow amateur radio configurations within the Open Space Zone, Sport and Active Recreation Zone or any other zones not identified in EI-P4(1) where it can be demonstrated that: a. they are compatible with the character and amenity values of the zone; and <i>b. any adverse effects are avoided, remedied, or mitigated in accordance with the ECO, NATC, NFL and CE provisions and in other cases minimised.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.61	EI - Energy and Infrastructure	Rules	Note	Considers that the 'Note' which states that provisions in Chapter 2 District Wide matters chapters still apply to activities provided for in rule sections A to Section F is generally appropriate. However, it is essential that these rules do not trump or override other district wide matters. [See original submission for full reasons]	Amend Energy and Infrastructure Note by: 1. deleting the words ' Unless otherwise specified in this chapter, ' AND 2. amending the second note to make it abundantly clear that other district wide chapters will apply.
Royal Forest and Bird Protection Society	156.62				Submission point deleted due to duplication, refer to submission point 156.50	Refer to submission point 156.50
Royal Forest and Bird Protection Society	156.63	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R1 Maintenance and repair, or removal of infrastructure not otherwise addressed by another rule in this chapter	Considers the scale of activities and effects are uncertain. The permitted activity rules are not appropriate in the coastal environment.	Amend EI-R1 Maintenance and repair, or removal of infrastructure not otherwise addressed by another rule in this chapter as follows: Activity status: Permitted Where: PER-1 <i>EI-S1 is complied with.</i> PER-2 <i>The removal is not in the coastal environment</i> Activity status when compliance not achieved: Restricted Discretionary <i>Matters of discretion are restricted to:</i> 1. <i>the matters of discretion of any infringed standard</i> 2. <i>effects on the coastal environment.</i>
Royal Forest and Bird Protection Society	156.64	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R2 Upgrading of underground infrastructure, not otherwise addressed by another rule in this chapter	Considers the scale of activities and effects are uncertain and the permitted activity rules are not appropriate in the Coastal Environment.	Amend EI-R2 Upgrading underground infrastructure as follows: Activity status: Permitted Where PER-1 <i>EI-S2 is complied with.</i> PER-2 <i>The upgrading is not in the coastal environment.</i> Activity status when compliance not achieved: Restricted Discretionary <i>Matters of discretion are restricted to:</i> 1. <i>the matters of discretion of any infringed standard.</i> 2. <i>effects on the coastal environment.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.65	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R3 New underground infrastructure (including customer connections) not otherwise addressed by another rule in this chapter	Considers the scale of activities and effects are uncertain and the permitted activity rules are not appropriate in the Coastal Environment.	<p>Amend EI-R3 New underground infrastructure (including customer connections) not otherwise addressed by another rule in this chapter as follows:</p> <p><i>EI-R3 New underground infrastructure (including customer connections) not otherwise addressed by another rule in this chapter</i></p> <p>Activity status: Permitted</p> <p><u>Where</u></p> <p><u>PER-1</u></p> <p><u>The upgrading is not in the coastal environment.</u></p> <hr/> <p>Activity status when compliance not achieved: Not applicable</p> <p><u>Matters of discretion are restricted to:</u></p> <p><u>1. Effects on the Coastal Environment.</u></p>
Royal Forest and Bird Protection Society	156.66	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R5 Vehicle access tracks for network utilities, including ancillary access tracks	Considers the scale of activities and effects are uncertain and permitted activity rules are not appropriate in the coastal environment or for outstanding landscapes. While it is also not appropriate within SNA, the ECO rules address vehicle access tracks.	<p>Amend EI-R5 Vehicle access tracks for network utilities, including ancillary access tracks as follows:</p> <p>Activity status: Permitted</p> <p>Where:</p> <p><u>PER-1</u></p> <p>[...].</p> <p><u>PER-4</u></p> <p><u>The vehicle access track is not in the Coastal Environment or and Outstanding Natural Landscape</u></p> <p>Activity status when compliance not achieved: Restricted Discretionary</p> <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. the purpose, necessity and location of the vehicle access track; and 2. the impact on the character and qualities of the surrounding area. 3. <u>Effects on the Coastal Environment.</u>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.67	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R11 New overhead lines and associated support structures that convey electricity excluding customer connections	Considers the scale of activities and effects are uncertain and the permitted activity rules are not appropriate in the coastal environment.	Amend EI-R11 New overhead lines and associated support structures that convey electricity excluding customer connections as follows: Activity status: Permitted Where: PER-1 <i>EI-S1 is complied with.</i> PER-2 <i>The new overhead lines and associated support structures are not in the Coastal Environment</i>
						Activity status: Restricted Discretionary Matters of discretion are restricted to: [...] 4. any adverse effects on public health and/or safety; and 5. <i>effects on the Coastal Environment.</i>
Royal Forest and Bird Protection Society	156.68	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R12 New electricity generation	Considers that new non-renewable electricity generation should be discouraged.	Amend EI-R12 New electricity generation as follows: Activity status: Discretionary-Non-complying [...]

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.69	EI - Energy and Infrastructure	Rules Section C - Rules for network utilities - Three Waters	EI-R22 Construction, maintenance repair and upgrading of underground water supply, wastewater systems and stormwater infrastructure	Considers the scale of activities and effects are uncertain and that the permitted activity status is not appropriate in the coastal environment. Unclear if the rule is providing for the installation of new water, wastewater and stormwater that will connect to existing networks or just the point of connecting.	<p>Amend EI-R22 Construction, maintenance, repair and upgrading of underground water supply, wastewater systems, and stormwater infrastructure follows:</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1</p> <p>Any pipe is not located on or within a waterbody, except where it is:</p> <ol style="list-style-type: none"> 1. attached to and/or incorporated within an existing bridge structure; or 2. within an existing conduit or duct. <p>PER-2</p> <p><u>The new water, wastewater and stormwater connections are not in the Coastal Environment</u></p> <p>Activity status when compliance not achieved: Restricted Discretionary</p> <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. the functional needs and operational needs of, and benefits from, the activity, including the potential impact on the levels of service or health and safety if the work is not undertaken; and 2. the impact on the character and qualities of the surrounding area. 3. <u>Effects on the Coastal Environment.</u>
Royal Forest and Bird Protection Society	156.70	EI - Energy and Infrastructure	Rules Section C - Rules for network utilities - Three Waters	EI-R23 New water, wastewater and stormwater connections to existing reticulated networks	Considers the scale of activities and effects are uncertain and that the permitted activity status is not appropriate in the coastal environment.	<p>Amend EI-R23 New water, wastewater and stormwater connections to existing reticulated networks as follows:</p> <p>Activity status: Permitted</p> <p>Where</p> <p>PER-1</p> <p><u>The construction and upgrading is not in the Coastal Environment</u></p> <p>Activity status when compliance not achieved: Not applicable</p> <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. <u>Effects on the Coastal Environment.</u>

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Royal Forest and Bird Protection Society	156.71	EI - Energy and Infrastructure	Rules Section C - Rules for network utilities - Three Waters	EI-R25 Maintenance, repair and upgrading of ... water systems infrastructure, including: [...]	Considers the extent to which the rule provides for new buildings is uncertain. This may not be appropriate within the coastal environment.	<p>Amend EI-R25 as follows:</p> <p><i>EI-R25 Maintenance, repair and upgrading of ... water systems infrastructure, including: [...]</i></p> <p><i>[...]</i></p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1</p> <p><i>[...]</i></p> <p><u>PER-4</u></p> <p><u>The new buildings and structures are not in the coastal environment.</u></p> <p>Activity status when compliance not achieved with PER-1, PER-2 and PER-4: Restricted Discretionary</p> <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. the functional needs and operational needs of, and benefits from, the activity, including the potential impact on the levels of service or health and safety if the work is not undertaken. 2. the bulk, height, location and design of the activity, including any associated buildings or structures. 3. the impact on the character and qualities of the surrounding area. 4. <u>effects on the Coastal Environment.</u>
Royal Forest and Bird Protection Society	156.72	EI - Energy and Infrastructure	Rules Section C - Rules for network utilities - Three Waters	EI-R26 Construction of new underground and above ground water systems infrastructure, including:...	Considers the extent to which the rule provides for new buildings is uncertain. This may not be appropriate within the coastal environment.	<p>Amend EI-R26 as follows:</p> <p><i>EI-R26 Construction of new underground and above ground water systems infrastructure [...]</i></p> <p>1. Rural Zones</p> <p>Activity status Permitted</p> <p>Where:</p> <p>PER-1</p> <p><i>[...]</i></p> <p><u>PER-3</u></p> <p><u>The new buildings and structures are not in the Coastal Environment.</u></p> <p>Activity status when compliance not achieved with PER-1 and PER-3: Restricted Discretionary</p> <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. the functional needs and operational needs of, and benefits from, the activity, including the potential impact on the levels of service or health and safety if the work is not undertaken. 2. the bulk, height, location and design of the activity, including any associated buildings or structures. 3. the impact on the character and qualities of the surrounding area.

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						<p><u>4. effects on the Coastal Environment.</u></p> <p>Activity status when compliance not achieved with PER-2</p> <p>[...]</p>
Royal Forest and Bird Protection Society	156.73	EI - Energy and Infrastructure	Rules Section E - Rules for Renewable Electricity Generation	EI-R32 The installation, operation, maintenance, upgrading and removal of a solar cell or any array of solar cells for a small-scale renewable electricity generation and its use.	Considers “small scale” is unclear and may affect the habitat of indigenous species such as bird breeding, roosting, and feeding in the coastal environment of bat habitat. The removal of trees including exotic trees that provide for bat habitat should not be a permitted activity.	<p>Amend EI-R32 with the following changes:</p> <p>ADD a new PER-X</p> <p><u>The installation and upgrading is not in the coastal environment</u></p> <p>ADD a new PER-X</p> <p><u>The installation and upgrading does not include the removal of any trees</u></p> <p>AND</p> <p>ADD the following matters of discretion:</p> <ul style="list-style-type: none"> - <u>Effects on the coastal environment;</u> - <u>Effects on bats</u> <p>[The submitter has not specified which Zone(s) the request relates to]</p>
Royal Forest and Bird Protection Society	156.74	EI - Energy and Infrastructure	Rules Section E - Rules for Renewable Electricity Generation	EI-R33 The installation, operation, maintenance, upgrading and removal of a small-scale wind turbine/s for small scale-scale renewable electricity generation and its use	Considers “small scale” is unclear and may affect the habitat of indigenous species such as bird breeding, roosting, and feeding in the coastal environment of bat habitat. The removal of trees including exotic trees that provide for bat habitat should not be a permitted activity.	<p>Amend EI-R33 The installation, operation, maintenance, upgrading and removal of a small-scale wind turbine/s for small-scale renewable electricity generation and its use as follows:</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1</p> <p>[...]</p> <p>PER-7</p> <p><u>The installation and upgrading is not in the coastal environment;</u></p> <p>PER-8</p> <p><u>The installation and upgrading does not include the removal of any trees;</u></p> <p>Activity status when compliance not achieved with PER-1 to PER-5, PER-7 and PER-8: Restricted Discretionary</p> <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. the functional needs and operational needs of, and benefits from, the activity; and 2. the impact on the character and qualities of the surrounding area; and 3. noise; and <p><u>4. effects on the coastal environment; and</u></p> <p><u>5. effects on bats.</u></p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.75	TRAN - Transport	Introduction	General	Not specified.	Retain as notified.
Royal Forest and Bird Protection Society	156.76	TRAN - Transport	Objectives	TRAN-O1 Safe, efficient, Land transport	Considers low emissions should be included in the objective.	Amend TRAN-O1 Safe, efficient, integrated and sustainable land transport infrastructure as follows: <i>Land transport infrastructure that is well-connected, integrated, and accessible <u>and supports low emissions</u> and which:</i> [...]
Royal Forest and Bird Protection Society	156.77	TRAN - Transport	Objectives	TRAN-O2 Transport related effects	Supports as adverse effects arising from Transport activities should be addressed in other more specific chapters.	Retain as notified.
Royal Forest and Bird Protection Society	156.78	TRAN - Transport	Objectives	TRAN-O3 Adverse effects on land transport infrastructure	Neutral position on this objective.	Retain as notified.
Royal Forest and Bird Protection Society	156.79	TRAN - Transport	Policies	TRAN-P4 New land transport infrastructure	Considers the term land transport infrastructure is far ranging and many of these activities should not necessarily be allowed in sensitive environments. TRAN-P4 (1) (b) mentions objectives and policies in the more prescriptive relevant chapters. The word protect does not equal the directive wording of avoid where protection could lead to significant temporary effects.	Amend TRAN-P4 New land transport infrastructure as follows: <i>Only allow land transport infrastructure:</i> 1. <i>Within sensitive environments/overlays, where it can be demonstrated that:</i> <i>a. the identified characteristics and values of the Overlay it is within will be protected; and</i> <i>b. the relevant objectives for the Overlay will be achieved; and</i> <i>c. <u>policies in the Natural Environment Chapter will be achieved.</u></i>
Royal Forest and Bird Protection Society	156.80	CL - Contaminated Land	Objectives	CL-O1 Management of contaminated land	Considers the objective needs to include reference to contaminated land being made safe for indigenous biodiversity. The NES-CL focuses on land that is a risk to human health. The District Plan should go one step further and also ensure contaminated land is made safe for the environment so it can contribute to indigenous biodiversity.	Amend CL-O1 Management of contaminated land as follows: <i>Contaminated land is made safe for human health, <u>and for the health of indigenous biodiversity,</u> and for its intended use, land disturbance, development or subdivision.</i>
Royal Forest and Bird Protection Society	156.81	CL - Contaminated Land	Policies	CL-P1 Investigation of contaminated and potentially contaminated land	Considers the proposed District Plan should ensure contaminated land is made safe for the environment so it can contribute to indigenous biodiversity.	Amend CL-P1 Investigation of contaminated and potentially contaminated land as follows: <i>Require the investigation of contaminated land or potentially contaminated land prior to any change of use, land disturbance, development or subdivision of land that could result in an increase in the risk to human health <u>and ecosystem health</u> resulting from any contamination of the land.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.82	CL - Contaminated Land	Policies	CL-P2 Subdivision, use and development of contaminated land	Considers the Proposed District Plan should ensure contaminated land is made safe for the environment so it can contribute to indigenous biodiversity.	Amend CL-P2 Subdivision, use and development of contaminated land as follows: <i>Any proposal to subdivide, use or develop contaminated land must follow a best practice approach to:</i> <i>1. manage contaminated soil to protect human health; and</i> <i>2. ensure the land is suitable for its intended use. <u>and</u></i> <i>3. <u>manage contaminated soil to protect indigenous biodiversity.</u></i>
Royal Forest and Bird Protection Society	156.83	CL - Contaminated Land	Policies	CL-P3 Remediation and management works	Considers the Proposed District Plan should ensure contaminated land is made safe for the environment so it can contribute to indigenous biodiversity.	Amend CL-P3 Remediation and management works as follows: <i>Ensure that the risks to human <u>and environmental</u> health from any remediation of, or any management works undertaken on, contaminated land, do not increase, and, where possible encourage the reduction of those risks.</i>
Royal Forest and Bird Protection Society	156.84	CL - Contaminated Land	Rules	New	Considers the chapter requires another rule or standard in addition to the NES-CL to ensure surrounding environmental health / indigenous biodiversity is protected.	Either add a new standard or a new rule to protect environmental health / indigenous biodiversity.
Royal Forest and Bird Protection Society	156.85	NH - Natural Hazards	Objectives	NH-O3 Natural hazard mitigation works	Considers Natural Hazard Mitigation works should reduce the risk to native species also and make provision for expanding their range, as part of the preference for using natural features and buffers.	Amend NH-O3 Natural hazard mitigation works as follows: <i>Natural hazard mitigation works reduce risks to people and property, <u>and native species</u>, with a preference for the use of natural features and buffers and <u>restoring and expanding natural habitat.</u></i>
Royal Forest and Bird Protection Society	156.86	NH - Natural Hazards	Policies	NH-P1 Identification of natural hazards and approach to management within Natural Hazard Areas	Considers the policy should include the identification and mapping of existing and potential habitat of native species that is subject to natural hazards.	Amend NH-P1 to include identification and mapping of existing and potential habitat of native species that is subject to natural hazards. Such as coastal habitat, wetlands, or riverbed/ margin/ floodplain habitat for native fauna. Include a clause that considers the level and severity of risk to native species and habitat from the natural hazard and provide for its ability to recover after a natural hazard event.
Royal Forest and Bird Protection Society	156.87	NH - Natural Hazards	Policies	NH-P3 Role of natural features and vegetation	Considers healthy, expansive, functioning natural ecosystems provide greater resilience to natural hazards for people as well as native species. Expand policy to include native vegetation and habitat for native species. Remove where appropriate. This would give better effect to the RMA s 6a.	Amend NH-P3 Role of natural features and vegetation in hazard mitigation as follows: <i>Protect, maintain and restore, where appropriate, natural topographic features and vegetation <u>including native habitat</u> that assists with avoiding or mitigating the risk to people <u>and native species</u> and significant risk to property from natural hazards.</i>
Royal Forest and Bird Protection Society	156.88	NH - Natural Hazards	Policies	New	Considers that by excluding RSI in NH-P10, there is no policy direction for development of RSI in high hazard areas. NH-P11 only addresses natural hazard areas not High Hazard Area.	Add a new policy to the NH - Natural Hazards Chapter to provide guidance for development of RSI in high hazard areas.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.89	NH - Natural Hazards	Rules	General	Considers the rules should protect native species and their habitat from natural hazards and mitigation works.	Ensure the rules of the NH chapter protect native species and their habitat from natural hazards and mitigation works.
Royal Forest and Bird Protection Society	156.90	HS - Hazardous Substances	Policies	HS-P1 New Major Hazard Facilities and additions to existing Major Hazard Facilities	Considers the policy should only consider hazard facilities in places where unacceptable risks to the environment other than those sensitive environments are avoided.	Amend HS-P1 New Major Hazard Facilities and additions to existing Major Hazard Facilities as follows: <i>Avoid unacceptable risks of new Major Hazard Facilities and additions to Major Hazard Facilities by:</i> 1. [...] [...] <i>5. Ensuring in areas, that are not sensitive environments or Natural Hazard Areas, suitable measure are undertaken to avoid, remedy or mitigate the risk of hazardous substances entering the environment.</i>
Royal Forest and Bird Protection Society	156.91	HS - Hazardous Substances	Rules	New	Considers New Hazardous facilities should be a restricted discretionary activity so the location can be controlled and, if the risk to the environment is too high to the environment, it can be declined.	Amend HS - Hazardous Substances Chapter by adding a new restricted discretionary activity rule for new hazardous facilities.
Royal Forest and Bird Protection Society	156.92	TREES - Notable Trees	Introduction	General	Considers mentioning in the introduction that notable trees, indigenous or exotic may be significant habitat for native species.	Amend TREES - Notable Trees Introduction as follows: <i>Notable Trees are trees or groups of trees with significant values that are identified and listed within SCHED5 - Schedule of Notable Trees. Council uses the Standard Tree Evaluation Method (STEM) to measure..... . Smaller and less prominent trees may be significant if they rank highly with respect to a number of the criteria, or if they commemorate a notable person or significant event. Some notable trees or groups of trees with significant values may also provide habitat for significant indigenous fauna. Notable trees are a component of amenity values and the quality of the environment that the RMA seeks to maintain and enhance.</i>
Royal Forest and Bird Protection Society	156.93	TREES - Notable Trees	Objectives	TREES-O1 Notable Trees	Not specified.	Not specified.
Royal Forest and Bird Protection Society	156.94	TREES - Notable Trees	Policies	TREES-P4 Removal of Notable Trees	Considers that the policy should recognise that some notable trees and groups of trees with significant value may provide habitat for significant indigenous fauna and only allow for clearance where it will not endanger the habitat values.	Amend TREES-P4 Removal of Notable Trees as follows: <i>Only allow the removal of a Notable Tree where:</i> [...] <i>5. the removal is undertaken without adversely affecting other Notable Trees; and</i> <i>6. the removal will not adversely affect the habitat values provided to significant indigenous fauna.</i>
Royal Forest and Bird Protection Society	156.95	TREES - Notable Trees	Rules	General	Not specified.	Not specified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.96	ECO - Ecosystems and Indigenous Biodiversity	General	General	Considers that the Proposed District Plan should give effect to the NPS-IB where it has not already.	Where the plan does not give effect to the NPS-IB (if it is gazetted), then it should do so through this plan review process.
Royal Forest and Bird Protection Society	156.97	ECO - Ecosystems and Indigenous Biodiversity	Introduction	General	Notes that the Timaru District contains some unique and representative examples of indigenous vegetation and habitat for indigenous fauna, including some at-risk, threatened, and endangered species. A more thorough description of the indigenous vegetation and habitat of native fauna; and the presence of at-risk, threatened, and endangered species should be included. A sentence celebrating the districts SNAs would also be helpful.	Amend ECO Introduction as follows: <i>The district contains a diverse range of habitats that support indigenous plants and animals, including at-risk, threatened, and endangered indigenous species, including the nationally critical pekapeka/Long Tailed Bat and the at-risk and declining kororā /Little Penguin. Many of these habitats are endemic, comprising forests, shrub lands, herb fields, tussock grasslands, and waterbody margins, including coastal areas. Some contain exotic species. The amount and type of indigenous vegetation remaining in the District varies over the rural area, due to many factors. Some areas have been actively conserved by landholders, and some simply left alone. The Council has a responsibility In addition, there are likely to be a range of other areas not yet assessed, but containing significant values, that meet the APP5 Criteria for identifying Significant Natural Areas, and will be progressively assessed, listed, and mapped in the Plan.</i>
Royal Forest and Bird Protection Society	156.98	ECO - Ecosystems and Indigenous Biodiversity	Objectives	ECO-O1 Protection of significant indigenous biodiversity	Notes the RMA s6c requirement is to protect significant natural areas, not just the values.	Amend ECO-O1 Protection of significant indigenous biodiversity as follows: <i>The values of s Significant indigenous vegetation and significant habitats of indigenous fauna is are protected.</i>
Royal Forest and Bird Protection Society	156.99	ECO - Ecosystems and Indigenous Biodiversity	Objectives	ECO-O2 Maintenance and enhancement of indigenous biodiversity	Not specified.	Retain as notified.
Royal Forest and Bird Protection Society	156.100	ECO - Ecosystems and Indigenous Biodiversity	Objectives	ECO-O3 Recognition of Ngāi Tahu	Not specified.	Retain as notified.
Royal Forest and Bird Protection Society	156.101	ECO - Ecosystems and Indigenous Biodiversity	Policies	ECO-P1 Assessment and identification of significant indigenous biodiversity	Not specified.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.102	ECO - Ecosystems and Indigenous Biodiversity	Policies	ECO-P2 Appropriate indigenous vegetation clearance in significant natural areas	Consider the word 'Appropriate' in the policy heading makes the purpose of the policy uncertain. Considers the policy actually seems to contain provisions that sit better as rules. Requests reword the policy to simplify it and show that Council may consider allowing clearance in certain circumstances.	Amend ECO-P2 as follows: ECO-P2 Appropriate indigenous vegetation clearance in significant natural areas <i>Consider allowing Provide for the clearance of indigenous vegetation in Significant Natural Areas where it is appropriate for health, <u>safety, and wellbeing</u> or customary reasons, <u>by enabling clearance</u>:</i> 1. [...]. [...]. <i>for the operation, maintenance or repair of the National Grid and public roads.</i>
Royal Forest and Bird Protection Society	156.103	ECO - Ecosystems and Indigenous Biodiversity	Policies	ECO-P3 Protection of indigenous biodiversity in sensitive areas	Considers sensitive areas should also include areas that are predominantly covered in indigenous vegetation but no identified as SNA as nation-wide there isn't sufficient protection over such vegetation. Also refer to areas where threatened indigenous species are found. Inadvertent or intentional cultivation on some farms has resulted in the loss of threatened species. These sorts of activities should in the very least require resource consent.	Amend ECO-P3 Protection of indigenous biodiversity in sensitive areas as follows: <i>Protect indigenous biodiversity by managing the clearance of indigenous vegetation in the following sensitive areas:</i> 1. <i>riparian areas, wetlands and springs; and</i> 2. <i>coastal areas; and</i> 3. <i>areas at higher altitude; and</i> 4. <i>areas on steep slopes; <u>and</u></i> <i>5. Areas dominated by native vegetation; and</i> <i>6. Areas with a community of threatened indigenous vegetation species.</i>
Royal Forest and Bird Protection Society	156.104	ECO - Ecosystems and Indigenous Biodiversity	Policies	ECO-P4 Protection for long-tailed bats	Supports protection for Long Tailed Bats although the high mobility of bats means the Bat protection area should not be limited to the current Bat Protection Area overlay in the planning maps. The policy should not be limited to Long Tailed Bats. The policy should extend to important habitat of other native fauna, including lizards, invertebrates, and birds.	1. Amend ECO-P4 to include the ability to increase the bat protection overlay as more information is understood about Long Tailed Bats and their extent in the district. 2. Add a new policy that provides protection for all other native fauna species.
Royal Forest and Bird Protection Society	156.105	ECO - Ecosystems and Indigenous Biodiversity	Policies	ECO-P5 Protection of Significant Natural Areas	Considers the RSI definition is wide ranging and will result in the loss of SNAs.	Amend ECO-P5 Protection of Significant Natural Areas as follows: <i>Avoid the clearance of indigenous vegetation and earthworks within SNAs, unless these activities:</i> <i>1. can be undertaken in a way that protects the identified ecological values; and</i> <i>2. are for regionally significant infrastructure and it can be demonstrated that adverse effects are managed in accordance with EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.106	ECO - Ecosystems and Indigenous Biodiversity	Policies	New	<p>Considers there is no policy direction for clearance of indigenous vegetation outside of SNAs, sensitive areas, or the Bat Protection Area. It is important to maintain Indigenous vegetation / biodiversity across the district to meet objective ECO-O2.</p> <p>Considers this should also be accompanied with maps of improved pasture in line with the relief sought in regard to the definition of improved pasture.</p>	<p>Add a new policy to the ECO - Ecosystems and Indigenous Biodiversity Chapter, as follows:</p> <p><u>ECO-PX</u></p> <p><u>Outside of SNAs and sensitive areas provide for low impact activities that may have less than minor adverse effects on indigenous biodiversity values, where these are of wider environmental or community benefit, or enable existing activities.</u></p> <p><u>Identify Areas of improved pasture and map these areas.</u></p>
Royal Forest and Bird Protection Society	156.107	ECO - Ecosystems and Indigenous Biodiversity	Policies	New	<p>Supports ECO-P4 in its addressing the protection of Bat Protection Areas, however consider another policy is required to address other fauna that requires protection.</p>	<p>Add a new policy to the ECO - Ecosystems and Indigenous Biodiversity Chapter, as follows:</p> <p><u>ECO-PX</u></p> <p><u>Protect threatened and at-risk species and their habitats by avoiding significant adverse effects and managing other adverse effects of activities on those species and their habitats.</u></p>
Royal Forest and Bird Protection Society	156.108	ECO - Ecosystems and Indigenous Biodiversity	Rules	General	<p>Oppose all rules that have the Coastal Environment Overlay within 20 metres area. The NZCPS applies to all aspects of the Coastal Environment not just the 20m from MHWS.</p>	<p>Amend all rules of the ECO chapter to give effect to the submitter's relief sought in regard to the spatial area of the Coastal Environment. This rule should apply to all of the coastal environment that is not SNA.</p>
Royal Forest and Bird Protection Society	156.109	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R1 Clearance of indigenous vegetation (except as provided for in ECO-R2 for flood protection works or ECO-R3 for National Grid activities)	<p>Supports ECO-R1.1.</p> <p>In relation to ECO-R1.2, if an area is assessed as Significant should be treated under ECO-R1. This relates to the related relief sought to the definition of SNAs.</p>	<p>1. Retain ECO-R1.1</p> <p>AND</p> <p>2. Amend ECO-R1.2 so non-compliance is discretionary.</p>
Royal Forest and Bird Protection Society	156.110	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R2 Clearance of indigenous vegetation for natural hazard mitigation works	<p>Neutral position on this.</p>	<p>Retain as notified.</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.111	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R3 Clearance of indigenous vegetation associated with the National Grid	Considers there should be some constraints on the proximity of the clearance to the National infrastructure.	Amend ECO-R3 Clearance of indigenous vegetation associated with the National Grid as follows: [...] PER-1 <i>The vegetation clearance is within 2 metres and is to provide for the operation, maintenance or repair of the National Grid, including maintenance of existing access to National Grid support structures; and.....</i> [...]
Royal Forest and Bird Protection Society	156.112	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R4 Clearance of trees in the Long-Tailed Bat Protection Area	Not specified.	Retain as notified.
Royal Forest and Bird Protection Society	156.113	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R5 Earthworks in a Significant Natural Area	Supports the restricted discretionary rule however, where compliance is not achieved it seems to go to just another restricted discretionary activity. This seems to be a mistake and the activities relating to the national grid and flood protection works may need to be another rule. The default for all sets of rules in ECO-R5 should remain non-complying.	1. Clarify whether there should be a reference to two different sets of restricted discretionary rules in the two columns or whether there should be two sets of rules; AND 2. Retain matters of discretion for all rules; AND 3. Retain non-compliance with ECO-5 as non-complying.
Royal Forest and Bird Protection Society	156.114	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R6 Subdivision of land containing a Significant Natural Area	Considers that unless the subdivision is to make an allotment specifically for the SNA the activity should be non-complying.	Amend to non-complying.
Royal Forest and Bird Protection Society	156.115	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R7 Planting of potential pest species	Not specified.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.116	ECO - Ecosystems and Indigenous Biodiversity	Rules	New	Supports the identification and mapping of SNAs. Although considers this is an ongoing exercise. There needs to be triggers through resource consents for further identification of SNAs. As future SNAs are identified the Plan should incorporate these SNAs into the Plan through plan changes. Work by others can be ground truthed and utilised. [Refer to original submission for full reason].	Add a new rule/s to the ECO - Ecosystems and Indigenous Biodiversity Chapter , regarding general indigenous vegetation clearance that maintains indigenous biodiversity outside of sensitive areas and SNAs. The development of this rule should: <ul style="list-style-type: none"> - Utilise and include maps of improved pasture / fully converted farmland in the plan. - Permit vegetation clearance in those areas and everywhere else have some sort of controls on indigenous vegetation clearance. As these maps are ground-trothed they should be implemented into the plan either through this plan review process or through a variation and then brought up to align with the process.
Royal Forest and Bird Protection Society	156.117	NATC - Natural Character	General	General	Considers lake margins should also be dealt with in this chapter, if not covered elsewhere. However, if there are no lakes in the district then this relief is not applicable. The Coastal Environment should be mentioned in this introduction if it is addressed under its own specific chapter.	1. Amend NATC - Natural Character Chapter, Introduction section to explain that natural character of coastal environment is dealt with in the Coastal Environment Chapters; AND 2. Amend entire chapter so it applies to lake margins as well (if there are lake margins).
Royal Forest and Bird Protection Society	156.118	NATC - Natural Character	Objectives	NATC-O1 Protection of natural character	Considers this chapter should include management of the margins of lakes. Section requires the preservation of the natural character of lakes and their margins.	Amend NATC-O1 to include lakes and their margins.
Royal Forest and Bird Protection Society	156.119	NATC - Natural Character	Objectives	New	Add a new objective seeking restoration of natural character where it has been degraded.	Add a new objective to NATC - Natural Character chapter as follows: <u>NATC-OX</u> <u>Restoration of the natural character of wetlands, rivers, lakes, and their margins where degradation has occurred.</u>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.120	NATC - Natural Character	Policies	NATC-P1 Natural character values	Considers the policy inappropriate as it refers to a natural state criterion and sets a high level of consideration which is inappropriate for natural character assessments.	<p>1. Delete NATC-P1;</p> <p>AND</p> <p>2. Replace with:</p> <p><u>NATC-P1</u></p> <p><u>Recognise the following natural elements, patterns, processes, and experiential qualities which contribute to the natural character values of wetlands, rivers, lakes, and their margins:</u></p> <p><u>1. Is in their natural state or close to their natural state;</u></p> <p><u>2. landforms and landscapes, biophysical, geologic, and morphological aspects;</u></p> <p><u>3. hydrological and fluvial processes, including erosion and sedimentation;</u></p> <p><u>4. indigenous biodiversity, habitats, and ecosystems;</u></p> <p><u>5. water flow and levels, colour and clarity, and water quality;</u></p> <p><u>6. the cultural values of the water body to Kāti Huirapa, including values associated with traditional and contemporary uses and the continuing ability of the waterbody to support taoka species and mahika kai activities.</u></p> <p><u>7. the experience of the above elements, patterns, and processes.</u></p>
Royal Forest and Bird Protection Society	156.121	NATC - Natural Character	Policies	New	Opposes the lack of policy direction for the identification of further High Naturalness Water Bodies. The CRPS has identified some but the Timaru District Council should endeavour to locate more and look at the values of other rivers. Further the introduction of the chapter says the rules allow for identification and assessment of natural character.	<p>Add a new policy to NATC - Natural Character chapter as follows:</p> <p><u>NATCP-X Identify, map and schedule significant freshwater bodies</u></p> <p><u>Continue the identification, mapping, and scheduling of wetlands, rivers, lakes, and their margins with one or more recognised natural character attributes, where the following apply:</u></p> <p><u>1. the wetland, river, lake, and their margins have high indigenous species and habitat values, where they support threatened, at risk, or regionally distinct indigenous species;</u></p> <p><u>2. the presence of distinctive geological features, such as fault traces, fossil localities, geoscience and geohistoric values, or represents a unique geomorphic process;</u></p> <p><u>3. cultural, spiritual or heritage associations of Ngāi Tūāhuriri to the freshwater body, including the ability to undertake customary practices; and</u></p> <p><u>4. importance of the freshwater body to provide access and connections to areas of recreational use.</u></p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.122	NATC - Natural Character	Policies	NATC-P4 Preservation of natural character from inappropriate subdivision, use and development	Considers that this policy conflicts with the requirements of s6 RMA.	Amend NATC-P4 Preservation of natural character from inappropriate subdivision, use and development as follows: <i>Preserves the natural <u>character</u> values of <u>wetlands, lakes, rivers, and their margins riparian margins by only allowing subdivision, use and development that and protect those values by</u></i> <i>1. avoids, or if avoidance is not possible, minimises any adverse effects on the elements, patterns, processes and experiential qualities outlined in NATC-P1;</i> <i>2. <u>Ensure that the location, intensity, scale, and form of subdivision, use and development of land takes into account the natural character values;</u></i> <i>3. <u>Require setbacks of activities, including buildings, structures, impervious surfaces, plantation forestry, woodlots, and shelterbelts;</u></i> <i>4.2 maintains natural character values which have been modified but are highly valued;</i> <i>5.3. restores or enhances natural character values in circumstances identified in NATC-P2; and</i> <i>6.4. avoids or, where that is not possible, does not exacerbate bank erosion.</i>
Royal Forest and Bird Protection Society	156.123	NATC - Natural Character	Policies	NATC-P5 Anticipated activities in riparian margins	Considers it is not appropriate for the Council to provide for activities.	Amend NATC-P5 Anticipated activities in riparian margins as follows: <i>Consider allowing Provide for activities in riparian margins which are appropriate for safety, enhancement, wellbeing or customary reasons, by enabling:</i>
Royal Forest and Bird Protection Society	156.124	NATC - Natural Character	Rules	NATC-R1 Vegetation clearance	Considers that PER-3 and PER-4 are too far reaching and should have spatial limits associated with them if they relate to indigenous vegetation clearance.	Either: 1. Amend NATC-R1 to make it clear that vegetation clearance does not include clearance of indigenous vegetation; OR 2. Amend NATC-R1 to affix a spatial limit to any clearance.
Royal Forest and Bird Protection Society	156.125	NATC - Natural Character	Rules	NATC-R3 Earthworks	Considers that NATC-R3(1).PER-3 is too wide, there would be instances where 3 metres would incorporate the entire margin. Considers NATC-R3(1).PER-1 and PER-2 need spatial limits and these spatial limits may vary from the size of the margin. Considers spatial limits are required for NATC-R3.3	Amend NATC- R3 Earthworks Riparian margins to: 1. Delete NAT- R3.1.PER-3 AND 2. Add spatial limits to NATC- R3.1.PER-1 and PER-2 which relate to width of the margin within which the activity is to occur. AND 3. Amend NATC-R3.3 by affixing spatial limits to the activities.
Royal Forest and Bird Protection Society	156.126	NFL - Natural Features and Landscapes	General	General	Ensure that the chapter gives effect to the CRPS Natural Features and Landscapes.	Amend NFL - Natural Features and Landscapes chapter to give effect to the CRPS.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.127	VS - Versatile Soil	General	General	Notes that the PDP presumably does not reflect the NPS-Highly Productive Land as it predates the NPS, but also notes that clause 3.4 of the NPS provides that soil classes 1, 2, and 3 are highly productive soils.	Amend the approach to Versatile Soils/Highly Productive Land to reflect the NPS-HPL. [refer to related submission point on the definition of Versatile Soils].
Royal Forest and Bird Protection Society	156.128	VS - Versatile Soil	Policies	VS-P1 Identification of versatile soils	Notes there is no requirement to map highly versatile soil. The NPS also applies to LUC 3.	Amend VS-P1 Identification of versatile soils to include identify and map versatile soil including LUC 3.
Royal Forest and Bird Protection Society	156.129	Planning Maps	Versatile Soils Overlay		Considers there is no requirement to map highly versatile soil. The NPS also applies to LUC 3.	Amend the Versatile Soils overlay to include LUC3.
Royal Forest and Bird Protection Society	156.130	VS - Versatile Soil	Policies	New	Notes that the NPS restricts urban rezoning of highly productive land.	Amend VS - Versatile Soil chapter by adding a new policy for avoiding urban rezoning unless certain matters are met as set out in the NPS.
Royal Forest and Bird Protection Society	156.131	VS - Versatile Soil	Rules	VS-R2 Subdivision of a site in Versatile Soils	Notes the NPS sets out clear requirements for subdivision, this policy does not reflect those.	Amend VS-R2 Subdivision of a site in the Versatile Soil Overlay as follows: Activity status: <i>Restricted Discretionary</i> <i>Matters of discretion are restricted to:</i> <i>1. the extent to which the proposed subdivision and the layout of allotments will result in fragmentation of versatile soils; and</i> <i>2. the extent to which the size and shape of any proposed allotments will allow for any versatile soils to continue to be used for non-intensive primary production.</i>
Royal Forest and Bird Protection Society	156.132	ASW - Activities on the Surface of Water	Introduction		Considers the introduction should recognise the value of the Rangitata Water Conservation Order. And motorised craft activities on the surface of water bodies should be discouraged during river bird breeding season.	Amend ASW - Activities on the Surface of Water Introduction as follows: <i>Activities occurring on the surface of water can have potential adverse effects on the ecological values, natural character values, recreational values and cultural values associated with the District's rivers. <u>The Water Conservation (Rangitata River) Order 2006 sets out the special features of the river and to be protected from adverse effects.</u> The provisions of this chapter seek to manage these adverse effects, while also providing for the sustainable use of motorised craft.</i>
Royal Forest and Bird Protection Society	156.133	ASW - Activities on the Surface of Water	Objectives	ASW-O1 Protecting the values of the District's Rivers	Not specified.	Retain as notified.
Royal Forest and Bird Protection Society	156.134	ASW - Activities on the Surface of Water	Policies	ASW-P1 Recreational use of non-motorised craft	Not specified.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.135	ASW - Activities on the Surface of Water	Policies	ASW-P2 Use of motorised craft for specified act	Not specified.	Not specified.
Royal Forest and Bird Protection Society	156.136	ASW - Activities on the Surface of Water	Policies	ASW-P3 Recreational use of motorised craft within specified areas of identified rivers	Not specified.	Not specified.
Royal Forest and Bird Protection Society	156.137	ASW - Activities on the Surface of Water	Policies	ASW-P5 Motorised craft within fish spawning area	Not specified.	Retain as notified.
Royal Forest and Bird Protection Society	156.138	CE - Coastal Environment	Introduction		<p>Considers the introduction does not reflect or explain which aspects of the NZCPS are addressed by other chapters of the plan which apply to the coastal environment, other than zones.</p> <p>The reference to the coastal environment being a narrow strip reflect the mapping which does not appear to have applied the NZCPS appropriately.</p> <p>The provisions in this chapter make blanket assumptions and provision for activities in the coastal environment without recognising that they may not in fact be appropriate when considering aspects of the NZCPS that are not addressed in this chapter.</p>	Amend the Introduction to the CE - Coastal Environment Chapter to give effect to the NZCPS.
Royal Forest and Bird Protection Society	156.139 9				Submission point deleted due to duplication, refer to submission point 156.4.	Refer to submission point 156.4.
Royal Forest and Bird Protection Society	156.140	CE - Coastal Environment	General	General	<p>Notes there are no provisions for protection of Outstanding Natural Features and landscapes in the Coastal Environment. The submitter recognises that there are not many ONFs or ONLs that would appear to be located in the Coastal Environment but there is at least one ONF-5. Presumably ONF-5 comes under Chapter NFL of the proposed plan. However, the NFL chapter does not give effect to the requirements of the NZCPS.</p>	<p>1. Amend CE - Coastal Environment Chapter to include a new objective policy and rule regime that protects ONLs and ONFs in accordance with the NZCPS.</p> <p>AND</p> <p>2. the same for any ONC's that are identified.</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.141	Planning Maps	ONLs, ONFs and ONCs		Considers it is not clear if this plan mapped ONLs, and ONFs in accordance with the NZCPS. There is no reference to any ONCs in the Timaru District. It is not clear if this exercise was undertaken, and none were found.	Reconsider the mapping of ONF and ONL and map ONCs in accordance with the NZCPS.
Royal Forest and Bird Protection Society	156.142	CE - Coastal Environment	Objectives	CE-O1 Coastal natural character	Considers the objective conflates s5 with s6 of the RMA which is not appropriate. Also objectives from the NZCPS - Objective 6 does not say enable people and communities to provide for the social, economic, and cultural wellbeing at the expense of the environment. It says to enable these features through use and development in appropriate places.	Amend CE-O1 Coastal natural character as follows: <i>The natural character of Timaru's Coastal Environment is preserved and protected from inappropriate subdivision, use and development, while enabling people and communities to provide for their social, economic, and cultural wellbeing and their health and safety.</i>
Royal Forest and Bird Protection Society	156.143	CE - Coastal Environment	Objectives	CE-O2 Quality of the Coastal Environment	Opposes the objective which is subjective as to what "quality" of the coastal environment is. The wording is not clear as it appears to be more about access to beaches and public spaces, than the coastal environment generally.	Delete CE-O2 Quality of the Coastal Environment .
Royal Forest and Bird Protection Society	156.144	CE - Coastal Environment	Objectives	CE-O3 Kāti Huirapa values	Not specified.	Retain as notified.
Royal Forest and Bird Protection Society	156.145	CE - Coastal Environment	Objectives	CE-O4 Coastal hazards	Considers the objective does not capture natural hazard, climate response and adaptation.	1. Delete CE-O4 Coastal hazards ; OR 2. Amend CE-O4 Coastal hazards as follows: <i>People, buildings and structures are protected from unacceptable risks arising from coastal hazards, <u>whilst taking account of climate change, through location and design of buildings and infrastructure, considering responses such as managed retreat for existing development.</u></i>
Royal Forest and Bird Protection Society	156.146	CE - Coastal Environment	Objectives	CE-O5 Natural features and buffers	Notes that the NZCPS, objective 5 requires the protection of natural features, it is not clear if being "used for coastal hazard management" is appropriate wording.	Amend CE-O5 as follows: CE-O5 Natural <u>defence features and buffers to coastal hazards</u> <i>Natural <u>defences, features and buffers to coastal hazards are protected, restored, and retained.</u> <u>Natural defences and buffers are used for coastal hazard management in preference to natural hazard mitigation works, wherever appropriate.</u></i>
Royal Forest and Bird Protection Society	156.147	CE - Coastal Environment	Objectives	CE-O6 Existing urban activities	Considers provision for Port Timaru is already captured by the RSI provisions in the EI chapter. Not all existing activities can be assumed to be appropriate. Some may not even be lawful. In addition, when considering "appropriate" under the NZCPS, this is in the context of what is to be protected. If an existing activity does not protect, it would not be appropriate. Any provision for such activities should be set out in policy with direction for protection.	Amend CE-O6 - Existing urban activities as follows: <i>Recognise that parts of the coastal environment are highly modified by existing urban activities, <u>and that these activities may not be inappropriate. including the Port of Timaru, and provide for these ongoing activities.</u></i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.148	CE - Coastal Environment	Policies	CE-P1 Identifying the Coastal Environment	While the policy is supported, the mapping does not appear to be accurate or adequate.	Retain CE-P1 but as covered by related submission on the Planning Maps, amendments to the coastal environment overlay are sought.
Royal Forest and Bird Protection Society	156.149	CE - Coastal Environment	Policies	New	There is no policy requiring the identification and mapping of Outstanding Natural Character in the coastal environment. The Natural Character chapter does not address outstanding natural character in the coastal environment.	Insert a new policy to the CE - Coastal Environment Chapter to give effect to NZCPS policy 13. Once ONCs are identified they need to be mapped and included in a schedule perhaps SCHED14 (which will require renaming).
Royal Forest and Bird Protection Society	156.150	CE - Coastal Environment	Policies	CE-P2 Identifying areas of high coastal natural character	There is no requirement in the policy to map these areas.	Amend CE-P2 Identifying areas of high coastal natural character to: <i>Identify <u>and map</u> the natural character of the areas within the terrestrial part of Timaru's coastal environment that have high natural character in accordance with the matters set out in CE-P5 below and describe these in SCHED14 - Schedule of attributes/qualities of coastal high natural character areas.</i>
Royal Forest and Bird Protection Society	156.151	CE - Coastal Environment	Policies	CE-P3 Identifying coastal hazards	Considers the policy does not give effect to NZCPS, policy 24 and 25.	1. Delete CE-P3 Identifying coastal hazards ; AND 2. Replace with policies that gives effect to NZCPS policies 24 and 25.
Royal Forest and Bird Protection Society	156.152	CE - Coastal Environment	Policies	CE-P4 Role of natural features and vegetation	While this policy appears to be giving effect to NZCPS policy 26 and 27, it also adds in words such as 'topographical' that were not present in the objective. It also uses a different test to that set out in the NZCPS i.e., a practicable test for restoration.	Amend CE-P4 Role of natural features and vegetation as follows: <i>Protect <u>and maintain, restore or enhance</u> natural <u>defences such as topographic features and vegetation beaches, estuaries, wetlands, intertidal areas, coastal vegetation, dunes and barrier islands</u>, that assist in avoiding or mitigating the risk to human life and <u>significant existing development property from coastal hazards, and where practicable restore such features and vegetation;</u> and <u>protects significant biodiversity, cultural or historic heritage or geological values from coastal hazards.</u></i>
Royal Forest and Bird Protection Society	156.153	CE - Coastal Environment	Policies	CE-P5 Coastal natural character matters	Notes the NZCPS, policy 13(2) says natural character may include the listed matters in CE-P5. However, NZCPS, policy 13(2) is not an exclusive list but CE-P5 is an exclusive list.	Amend CE-P5 Coastal natural character matters as follows: <i>Recognise that <u>the following matters contribute to</u> the coastal natural character of the terrestrial part of Timaru's coastal environment <u>may include matters such as:</u></i> [...]
Royal Forest and Bird Protection Society	156.154	CE - Coastal Environment	Policies	CE-P6 Kāti Huirapa values	Not specified.	Retain as notified.
Royal Forest and Bird Protection Society	156.155	CE - Coastal Environment	Policies	CE-P7 Restoration or rehabilitation of natural character	Considers this policy does not give effect to NZCPS policy 14. Also uses the word enhancement rather restore or rehabilitate.	Amend CE-P7 Restoration or rehabilitation of natural character as follows: <i><u>Enable Promote</u> and encourage restoration or rehabilitation of the coastal natural character of the coastal environment and require consideration of opportunities for <u>restoration or rehabilitation enhancement</u> where a proposal has an adverse effect on coastal natural character qualities.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.156	CE - Coastal Environment	Policies	CE-P9 Anticipated activities	Considers this does not give reflect the NZCPS, particularly policy 6.	Delete CE-P9 Anticipated activities .
Royal Forest and Bird Protection Society	156.157	CE - Coastal Environment	Policies	CE-P10 Preserving the natural character of the Coastal Environment	Considers this policy does not reflect the NZCPS, policy 13 in full. For instance, there is no mention of Outstanding Natural Character. Considers council needs to identify both ONC and High Natural Character. Perhaps Timaru District has used the language incorrectly and high = Outstanding, but this is not clear. Nevertheless, there should be at least three classifications of natural character in the coastal environment, i.e., ONC, High Natural Character and other natural character.	1. Delete CE-P10 Preserving the natural character of the Coastal Environment ; AND 2. Add a new policy in accordance with NZCPS policy 13.
Royal Forest and Bird Protection Society	156.158	CE - Coastal Environment	Policies	CE-P11 Preserve the natural character qualities of areas with Coastal High Natural Character	Considers this does not give effect to NZCPS, for example EI elevates many forms infrastructure to RSI.	1. Delete CE-P11 Preserve the natural character qualities of areas with Coastal High Natural Character ; AND 2. Create a new policy in accordance with NZCPS policy 13.
Royal Forest and Bird Protection Society	156.159	CE - Coastal Environment	Policies	CE-P12 Coastal Hazard Areas (excluding Regional Significant Infrastructure)	Considers that the policy should also direct where new development should occur.	Amend CE-P12 Coastal Hazard Areas (excluding Regional Significant Infrastructure) to give effect to NZCPS.
Royal Forest and Bird Protection Society	156.160	CE - Coastal Environment	Policies	CE-P13 Regionally Significant Infrastructure in Coastal Hazard Areas	Considers this policy does not accurately reflect the NZCPS.	Amend CE-P13 Regionally Significant Infrastructure in Coastal Hazard Areas as follows: <i>Only allow Discourage Regionally Significant Infrastructure, including the Port of Timaru, and only consider allowing Regionally significant infrastructure in areas subject to coastal hazards where:</i> 1. there is a functional or operational need for it to locate there; and 2. It will not create more than minor adverse coastal hazard effects on adjoining or surrounding land.
Royal Forest and Bird Protection Society	156.161	CE - Coastal Environment	Policies	CE-P14 Hard engineering natural hazard mitigation within the Coastal Environment	Considers this policy does not accurately reflect the NZCPS.	1. Delete CE-P14 Hard engineering natural hazard mitigation within the Coastal Environment AND 2. Create a new policy that better reflects the requirements of NZPCS policy 27.
Royal Forest and Bird Protection Society	156.162	CE - Coastal Environment	Rules	General	Notes there are no rules or overlays that discuss Outstanding Natural Character, or ONFs. The plan does not give effect to the NZCPS without avoiding adverse effects on ONCs and ONFs. Considers it is difficult to support any of the rules given the deficiencies in the objective and policy development.	Amend the CE - Coastal Environment rules: - to include a raft of new rules to avoid adverse effects on Outstanding Natural Character areas and ONFs; and - to give effect to the NZCPS.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.163	CE - Coastal Environment	Rules	CE-R2 Plantation forestry	Will depend on whether High Natural Character is actually ONC or not. If it's ONC then forestry should not be permitted. It is also difficult to see how afforestation should be a permitted activity in the coastal environment with significant controls.	<ol style="list-style-type: none"> Delete CE-R2.1 amend to require a discretionary consent for afforestation. Replanting should also require a consent and a larger setback than the NPS-PF provides is required. Keep CE-R2.2 non-complying.
Royal Forest and Bird Protection Society	156.164	CE - Coastal Environment	Rules	CE-R4 Buildings and structures and extensions (excluding Regionally Significant Infrastructure and fences)	Neutral position on this definition.	Retain as notified.
Royal Forest and Bird Protection Society	156.165	CE - Coastal Environment	Rules	CE-R5 Earthworks, excluding: earthworks for natural hazard mitigation works; and any land disturbance	Earthworks for underground utilities can be quite big depending on the method of installation. Clarity is required.	<p>Amend CE-R5 by:</p> <ol style="list-style-type: none"> Requiring all earthworks to be at least within 2 meters of the PER-1 activities; <p>AND</p> <ol style="list-style-type: none"> Deleting PER-2.
Royal Forest and Bird Protection Society	156.166	CE - Coastal Environment	Rules	CE-R6 Land disturbance	Considers difficult to ascertain what this sort of activity permits.	Delete CE-R6 Land disturbance .
Royal Forest and Bird Protection Society	156.167	CE - Coastal Environment	Rules	CE-R7 Regionally Significant Infrastructure - maintenance and upgrade	Considers this rule is just for maintenance and operation. Should not cover increases in the size of infrastructure or upgrades that increase scale and footprint of the activity.	<ol style="list-style-type: none"> Amend CE- R7 as follows: CE- R7 Regionally Significant Infrastructure - maintenance and upgrade <p>AND</p> <ol style="list-style-type: none"> Create a new rule for upgrade that increase the size of the activity to a restricted discretionary activity.
Royal Forest and Bird Protection Society	156.168	CE - Coastal Environment	Rules	CE-R8 Regionally Significant Infrastructure - New	<p>In relation to CE-R8.1, considers constructing RSI in the coastal environment as a permitted activity is inappropriate.</p> <p>In relation to CE-R8.2, considers that this depends on whether these areas are meant to be ONC or the lesser high natural character.</p>	<ol style="list-style-type: none"> Delete CE- R8.1 <p>AND</p> <ol style="list-style-type: none"> Amend CE-R8.2 from Discretionary to Non-complying activity

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.169	CE - Coastal Environment	Rules	CE-R12 Natural hazard mitigation works, including Earthworks - New	Opposes that there are no matters for discretion for effects on indigenous biodiversity.	Amend CE-R12 as follows: CE-R12 Natural hazard mitigation works, including earthworks - New This rule does not apply to natural hazard mitigation works only involving the planting of vegetation Matters of discretion are restricted to: [...] <u>6. Effects on indigenous biodiversity.</u>
Royal Forest and Bird Protection Society	156.170	CE - Coastal Environment	Rules	CE-R13 Primary Production not otherwise specified in this chapter	Not specified.	Retain as notified.
Royal Forest and Bird Protection Society	156.171	CE - Coastal Environment	Rules	CE-R14 Quarrying/Mining Activity (excluding for natural hazard mitigation works or reclamation within or adjacent the Port Zone)	Considers mining is unacceptable within the Coastal Environment and should be a prohibited activity.	Amend CE-14 to: 1. make mining a prohibited activity in the Coastal Environment; AND 2. retain the non-complying status for quarries.
Royal Forest and Bird Protection Society	156.172	LIGHT - Light	General	General	Submits that the impact of artificial light on native fauna should be considered in the plan.	Amend LIGHT - Light Chapter to ensure light on indigenous fauna is considered particularly in relation to the identified Bat Protection Area Overlay.
Royal Forest and Bird Protection Society	156.173	NOISE - Noise	Policies	New	Submits that the impacts of noise on native fauna should be considered.	Amend NOISE - Noise Chapter to include a policy that ensures that the impact of noise on native species is avoided or minimised.
Royal Forest and Bird Protection Society	156.174	NOSZ - Natural Open Space Zone	General	General	Considers this zone should be characterised by habitat for indigenous fauna. The matters of discretion should include the ability to protect significant and maintain other indigenous biodiversity (flora and fauna).	Amend NOSZ - Natural Open Space Zone to: 1. Include a reference to habitat for indigenous fauna in the Introduction; AND 2. Include a reference to habitat for indigenous fauna in NOSZ-O2 clause 2; AND 3. Include a matter of discretion regarding impacts on and the ability to protect and maintain indigenous fauna for all activities in the zone.
Royal Forest and Bird Protection Society	156.175	Plannin g Maps	Natural Open Space Zone		More of the coastal environment and all the district's public conservation land should be mapped as NOSZ to help give effect to the national adaptation plan.	Amend the Natural Open Space Zone by including all public conservation land and more of the coastal environment, particularly around the river mouths, river flood plains and hapua.

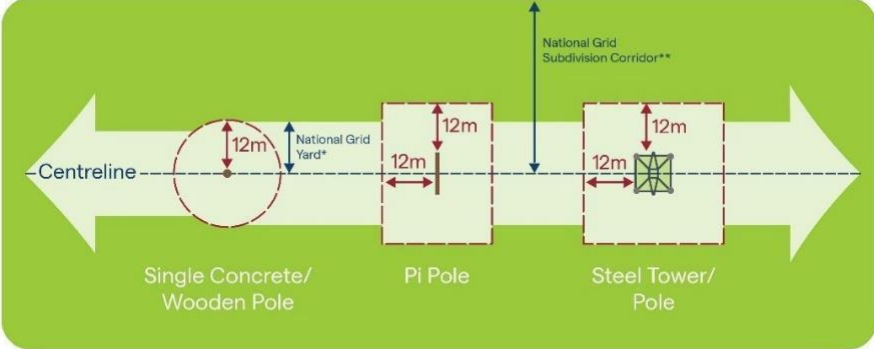
Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.176	APP5 - Criteria for Identifying Significant Natural Areas	General	General	Considers the plan should give effect to the NPS - Indigenous Biodiversity which came out in December 2022 in regard to the criteria for significance.	Retain as notified.
Royal Forest and Bird Protection Society	156.177	SCHED5 - Schedule of Notable Trees	SCHED5A - Schedule of Notable Individual Trees	SCHED5A - Schedule of Notable Individual Trees	Supports the inclusion of Notable Trees 3, 14, 40, 73, 90, 114, 119, 129. 132, 143, 154, 155, 160, 156, 167, 168, 161, 5 and SG-9 in SCHED 5.	Retain Notable Trees 3, 14, 40, 73, 90, 114, 119, 129. 132, 143, 154, 155, 160, 156, 167, 168, 161, 5 and SG-9 as notified in SCHED5 - Schedule of Notable Trees .
Royal Forest and Bird Protection Society	156.178	SCHED5 - Schedule of Notable Trees	SCHED5 - Schedule of Notable Trees	New	Considers additional trees specified in the relief sought should be included in SCHED5.	Add the following trees to SCHED5 - Schedule of Notable Trees : <u>TREESI-X Kowhai - Kingsdown south of Timaru, east of SH1 about opposite Campbell Road</u> <u>TREESI-X Kowhai - Pareora east of SH1 in a paddock near the bridge over the Pareora River</u> <u>TREESI-X Kowhai - on the escarpment near Davison Rd east of Cave</u> <u>TREESI-X Kahikatea - Gunnions Bush Temuka Domain, a fine specimen which was planted by Mayor Gunnion in 1912, as is understood - the juvenile itself came from Kakahu Bush according to the records. This tree is a far better specimen than the nearby forked totara which has been listed as a notable tree. So, recommend the kahikatea also be listed as a Notable Tree.</u> <u>TREESI-X Kanuka - one sole original small native tree on the northeast side of the Upper Orari Bridge, SH79.</u> <u>TREESI-X Totara - one fine medium sized specimen, on Rise Road east of Winchester, and before the Factory Rd intersection. It is growing just inside the fence line on the SW side of Rise Road. (recommended)</u>
Royal Forest and Bird Protection Society	156.179	SCHED5 - Schedule of Notable Trees	SCHED5 - Schedule of Notable Trees	TREESG-13 and TREESG-144	Oppose the inclusion of some of the trees that are possibly pest trees under the Canterbury Regional Pest Plan and should not be protected under the RMA. It also seems contrary to the purpose of ECO-R7 which makes the planting of sycamores, ash, and other pest trees a non-complying activity.	1. Amend SCHED5 - Schedule of Notable Trees to delete TREESG -13 and TREESG-144 ; AND 2. delete any other trees from SCHED5 , such ash and sycamore, because of their status under the Canterbury Regional Pest Plan.
Royal Forest and Bird Protection Society	156.180	Planning Maps	Notable Tree overlay	TREESG-13 and TREESG-144	Oppose the inclusion of some of the trees that are possibly pest trees under the Canterbury Regional Pest Plan and should not be protected under the RMA. It also seems contrary to the purpose of ECO-R7 which makes the planting of sycamores, ash, and other pest trees a non-complying activity.	Delete TREESG-13 and TREESG-144 from the Planning Maps and any others which are pest trees under the Canterbury Regional Pest Plan.
Royal Forest and Bird Protection Society	156.181	SCHED7 - Schedule of Significant Natural Areas	SCHED7 - Schedule of Significant Natural Areas	General	Support the inclusion of all the SNAs and add more SNAs as they become known to the schedule.	1. Retain SCHED7 as notified; AND 2. add to as new SNAs become known.

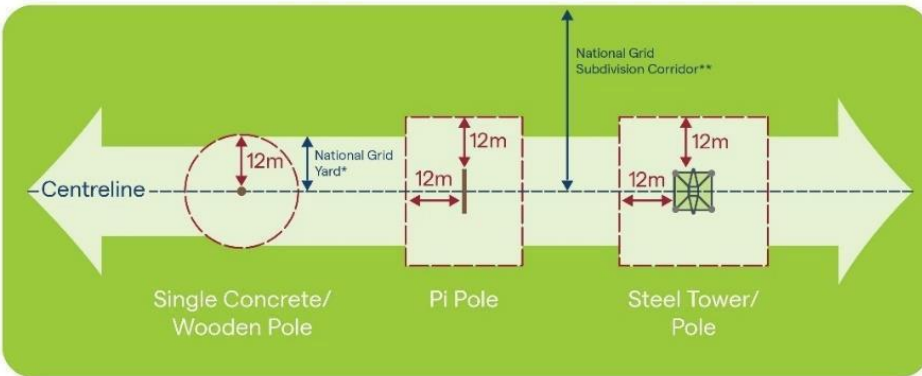
Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Royal Forest and Bird Protection Society	156.182	SCHED9 - Schedule of Outstanding Natural Features	SCHED9 - Schedule of Outstanding Natural Features	General	Support the inclusion of all the ONFs and add more ONFs as they become known to the schedule.	1. Retain SCHED9 as notified; AND 2. add to as new ONFs become known.
Royal Forest and Bird Protection Society	156.183	SCHED8 - Schedule of Outstanding Natural Landscapes	SCHED8 - Schedule of Outstanding Natural Landscapes	ONL-2 Peel Forest and Four Peaks Range	Support the inclusion of the existing ONLs. Considers ONL 2 should be called Mt Peel and the Four Peaks Range.	Retain and amend ONL-2 as follows: ONL-2 Peel Forest <u>Mt Peel and Four Peaks Range</u>.
Royal Forest and Bird Protection Society	156.184	SCHED8 - Schedule of Outstanding Natural Landscapes	SCHED8 - Schedule of Outstanding Natural Landscapes	New	Considers the PDP should include the Two Thumb, Hall, and Gammack Range ONL that straddles the boundary between the Timaru and Mackenzie Districts to give better give effect to the CRPS. ONL 2 should be called Mt Peel and the Four Peaks Range.	Add to SCHED8 the Two Thumb, Hall, and Gammack Range ONL as set out in APP 4 of the CRPS. ONL 2 should be called Mt Peel and the Four Peaks Range.
Royal Forest and Bird Protection Society	156.185				Submission point deleted due to duplication, refer to submission point 156.84.	Refer to submission point 156.84.
Royal Forest and Bird Protection Society	156.186	SCHED14 - Schedule of attributes - qualities of coastal high natural character areas	SCHED14 - Schedule of attributes - qualities of coastal high natural character areas	General	Support the inclusion of all coastal high natural character areas and add more coastal high natural character areas as they become known to the schedule.	1. Retain SCHED14 as notified; AND 2. add more coastal high natural character areas as they become known.
Royal Forest and Bird Protection Society	156.187	SCHED17 - Schedule of River Protection Areas	SCHED17 - Schedule of River Protection Areas	General	Considers the entire river as a protection area to be consistent with a Te Mana o te Wai, the overarching objective of the National Policy Statement for Freshwater Management. Rivers are dynamic and genuinely protecting particular stretches is reliant on the protection of the river as a whole.	1. Retain SCHED17 as notified AND 2. add more stretches and preferably the whole of a river from its source to the sea.
Ryan De Joux	157.1	Planning Maps	Rezone		Considers that insufficient additional residentially zoned land is provided within close proximity to the Washdyke. Rezoning more land within this vicinity would provide more suitable land for affordable houses to be built to meet the demand.	1. Rezone the land on the true right of Papakha Stream within records of title CB22F/884 and CB22F/885 owned by the Timaru District Council from Sports and Active Recreation to General Residential Zone . 2. Should this not be supported, then as a fallback position is that this area of land become a Future Development Area for residential development as a priority area for a Development Area Plan within 2 years.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Ryan De Joux	157.2	SCHED15 - Schedule of Future Development Areas	SCHED15 - Schedule of Future Development Areas	General	Given the restraints of the National Policy Statement for Highly Productive Land 2022 relating to the rezoning of rural land that requires the commencement of urban development within 10 years where identified by a council for future development, Council should amend all Future Development Areas on rural zoned land shown as “beyond 10 years” to “5 to 10 years”.	Amend all Future Development Areas shown as “Future Area - Beyond 10 years” to Future Area - Beyond 5 to 10 years” so the rural land can be rezoned for urban zones under the NPS-HPL.
Kenneth James and Rose Esther Tarrant	158.1	SASM - Sites and Areas of Significance to Māori	Wāhi tupuna overlay	SASM4 Waitarakao to Orari, inland to Seadown Road and including Arowhenua and Temuka	<p>Opposes the SASM Overlay and associated provisions on the submitter’s property (SASM4) as considers the implication of this overlay and associated provisions are against sovereign rights and were created without consultation with private landowners.</p> <p>Opposes any access to their property by agents of Timaru District Council</p> <p>[see original submission for full reasons]</p>	<p>Seeks that council must seek clarification from local Runanga for grounds for land to be classified as SAMS, with specific details of areas and exact basis of classification for consideration.</p> <p>Request Council to seek legal precedent for classification and limitations of private landowners’ rights:</p> <ol style="list-style-type: none"> 1. Legal precedent to limit private landowners right under rule of law 2. Runanga to hold public meeting to talk to as tangata whenua and how tikanga will impact the RMA process. Will they and local council fund RMA impacts if this impacts private landowners detrimentally. 3. No Private landowners has agreed to this process, it is not mandatory. Every affected party shall be consulted personally by council/runanga and a register held that is publicly available if both parties agree. 4. How will SAMS specifically impact RMA process outside of notifiable consents-land use / building consents /drainage/ pastoral types etc.
Kenneth James and Rose Esther Tarrant	158.2				Submission point deleted due to duplication, refer to submission point 158.1.	Refer to submission point 158.1

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Kenneth James and Rose Esther Tarrant	158.2	Planning Maps	Significant Natural Areas overlay		Opposes the application of the Significant Natural Areas Overlay on the submitter's property as considers the implication of this overlay and associated provisions are against sovereign rights and were created without consultation with private landowners. [see original submission for full reasons]	Request Council to seek legal precedent for classification and limitations of private landowners' rights: 1. Legal precedent to limit private landowners right under rule of law ... 3. No Private landowners has agreed to this process, it is not mandatory. Every affected party shall be consulted personally by council/runanga and a register held that is publicly available if both parties agree.
Transpower New Zealand Limited	159.1	General	General	General	Acknowledges that the PDP goes a long way to achieve statutory requirements under the NPSET, CRPS, NESETA and the RMA. However, considers amendments are required to give effect to or achieve the purpose of the legislation. Considers such amendments to enable the submitter to efficiently operate, maintain and develop the National Grid network to meet increasing demand and to seek security of supply, thereby contributing to New Zealand's economic and social aspirations. Considers the PDP needs to recognise and accommodate the ever-developing nature of National Grids, responding to changing supply and demand patterns, growth, reliability and security needs. [refer to original submission for full reasons].	1. Key elements of the submitter's relief seeks: <ul style="list-style-type: none">• the refinement of provisions that manage the potential adverse effects of the National Grid to achieve consistency, remove duplication and avoid possible conflict between provisions in different chapters;• alignment of the 'effects tests' provisions for the development of the National Grid with the direction given in the NPSET;• limited amendments to provisions that protect the National Grid to reflect the submitter's nationally consistent approach;• revisions to matters of discretionary to enable the consideration of the benefits of the National Grid; and• provisions that appropriately enable the operation, maintenance and particularly upgrading of the National Grid within various overlays, including by recognising the operational needs and functional needs of the National Grid. 2. The submitter seeks the following decision from the local authority: Amend the Proposed District Plan to make all required changes, including the specific amendments set out in the detailed submission points and such further alternative or consequential relief as may be necessary to fully give effect to this submission. [Refer relief sought on specific provisions]

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Transpower New Zealand Limited	159.2	Description of the District	Infrastructure	General	The submitter supports the approach to the nationally significant National Grid as 'regionally significant infrastructure', but considers the Introduction should consistently refer to the National Grid, not the electricity transmission network.	Amend the Infrastructure section of Description of the District chapter as follows: <i>The district contains the following Regionally Significant Infrastructure:</i> <ul style="list-style-type: none"> • Strategic land transport network and arterial roads • Timaru Airport • Port of Timaru • Telecommunication facilities • National, regional and local renewable electricity generation activities of any scale • The National Grid electricity transmission network • Sewage collection, treatment and disposal networks [...]
Transpower New Zealand Limited	159.3	Statutory Context	General	General	The submitter generally supports Figure 1 but seeks a correction to refer to the National Grid.	Amend Figure 1, Step 2 as follows: <i>Locate relevant District-wide matters chapters (e.g. Infrastructure and Energy) and overlays (e.g. the National Grid Yard grids).</i>
Transpower New Zealand Limited	159.4	Definitions	Definitions	Ancillary Rural Earthworks	The submitter is neutral in respect of the definition of 'ancillary rural earthworks', subject to the earthworks that fall under this definition being subject to the rules that provide for earthworks in the National Grid Yard.	1. Retain the definition of ' ancillary rural earthworks ' AND 2. confirm that the activity is subject to the rules that relate to earthworks in the National Grid Yard.
Transpower New Zealand Limited	159.5	Definitions	Definitions	Conductor	Considers the definition appropriately replicates the definition included in the NESETA.	Retain as notified.
Transpower New Zealand Limited	159.6	Definitions	Definitions	Indigenous Vegetation	Transpower is neutral in respect of the definition of 'indigenous vegetation' but notes that it is vital that the definition is sufficiently clear and appropriate so that the provisions in the Proposed District Plan that relate to indigenous vegetation give effect to higher order planning documents (including the NPSET and the CRPS). Further the definition must also be appropriate to National Environmental Standards that defer provisions in the Proposed District Plan, such as those in the NESETA. Transpower has some concern that, as drafted, a single indigenous plant would fall within the definition of 'indigenous vegetation' and also (as a result) the definition of 'clearing of indigenous vegetation'	None specified.
Transpower New Zealand Limited	159.7	Definitions	Definitions	Land disturbance	The submitter supports the definition of 'land disturbance' but it should be marked as a National Planning Standards definition.	Amend the definition of Land disturbance to demonstrate it is a National Planning Standards definition.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Transpower New Zealand Limited	159.8	Definitions	Definitions	Lifeline Utilities	The submitter supports the definition of 'lifeline utilities' to the extent it references the Schedule 1 to the Civil Defence and Emergency Management Act 2002 ("CDEMA") and the National Grid is understood to fall within the definition of 'lifeline utilities' in Schedule 1 to the CDEMA.	Retain as notified.
Transpower New Zealand Limited	159.9	Definitions	Definitions	National Grid	The submitter supports the definition of 'National Grid', on the basis it is achieved through cross-reference to the NPSET.	Retain as notified.
Transpower New Zealand Limited	159.10	Definitions	Definitions	National Grid Subdivision Corridor	The submitter supports the definition but notes that diagram 1 should be updated.	<p>Amend the definition of 'National Grid Subdivision Corridor' to replace Diagram 1 with the following:</p>  <p>* National Grid Yard: 10m for single concrete/wooden pole lines, 12m for all other line types ** National Grid Subdivision Corridor: 14m, 32m, 37m or 39m depending on line voltage</p>
Transpower New Zealand Limited	159.11	Definitions	Definitions	National Grid Yard	The submitter supports the definition of 'National Grid Yard' but considers it should be amended to provide for a scenario where a tubular steel tower replaces a lattice tower and replace Diagram 1 with an updated diagram.	<p>1. Amend the definition of National Grid Yard as follows: means, as depicted in Diagram 1: a. the area located within 10m of either side of the centreline of an above ground 110kV electricity transmission line on single poles;</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
						<p>b. the area located within 12m either side of the centreline of an above ground transmission line on pi-poles or towers that is 110kV or greater (<u>including tubular steel towers where these replace steel lattice towers</u>);</p> <p>c. the area located within 12m in any direction from the outer visible edge of an electricity transmission pole or tower foundation, associated with a line which is 110kV or greater.</p> <p>[...]</p> <p>AND</p> <p>2. Replace Diagram 1 with the below diagram.</p>  <p>* National Grid Yard: 10m for single concrete/wooden pole lines, 12m for all other line types ** National Grid Subdivision Corridor: 14m, 32m, 37m or 39m depending on line voltage</p>
Transpower New Zealand Limited	159.12	Definitions	Definitions	Network Utility	The submitter considers that the definition appropriately relies on the definition of 'network utility operation' in section 166 of the RMA.	Retain as notified.
Transpower New Zealand Limited	159.13	Definitions	Definitions	Pole [in relation to infrastructure and energy]	The submitter supports the definition of 'pole' as it is generally consistent with the definition in the NESETA.	Retain as notified.
Transpower New Zealand Limited	159.14	Definitions	Definitions	Regionally Significant Infrastructure	Supports the identification of the National Grid as 'Regionally Significant Infrastructure' but considers it should align with definitions and provisions elsewhere in the PDP.	<p>Amend the definition as follows:</p> <p>Regionally Significant Infrastructure is:</p> <ul style="list-style-type: none"> a. Strategic land transport network and arterial roads b. Timaru Airport c. Port of Timaru d. Telecommunication facilities e. National, regional and local renewable electricity generation activities of any scale f. The <u>National Grid electricity transmission network</u> g. Sewage collection, treatment and disposal networks <p>[...]</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Transpower New Zealand Limited	159.15	Definitions	Definitions	Renewable Electricity Generation	Considers the definition appropriately references the National Policy Statement for Renewable Electricity Generation 2011 (“NPSREG”).	Retain as notified.
Transpower New Zealand Limited	159.16	Definitions	Definitions	Renewable Electricity Generation Activity	Considers the definition appropriately references the NPSREG.	Retain as notified.
Transpower New Zealand Limited	159.17	Definitions	Definitions	Repair	Supports the clarity with which repairing is distinguished from ‘upgrading’ and ‘replacement’.	Retain as notified.
Transpower New Zealand Limited	159.18	Definitions	Definitions	Replacement	Considers that the definition should explicitly distinguish replacement from ‘upgrading’ and ‘repair’.	Amend the definition of Replacement as follows: <i>Means replacing an object or its parts with another of the same or similar location, height, size, capacity, footprint and scale and for the same or similar purpose, <u>but excludes repair and upgrading.</u></i>
Transpower New Zealand Limited	159.19	Definitions	Definitions	Reverse Sensitivity	Supports the definition but seeks amendments to improve grammar and clarity.	Amend the definition of Reverse Sensitivity as follows: <i>means the potential for the operation of an existing lawfully established activity to be compromised, constrained, or curtailed by the more recent establishment or alteration of another activity which that may be sensitive to the actual, potential or perceived adverse environmental effects generated by the an existing activity.</i>
Transpower New Zealand Limited	159.20	Definitions	Definitions	Sensitive Activity	Supports the inclusion of the definition but it is not clear what is meant by ‘electronic transmission’, so this should be deleted or clarified.	Amend the definition of Sensitive activity as follows: 1. Residential activities; 2. Education facilities and preschools; 3. Guest- & and visitor accommodation; 4. Health care facilities which include accommodation for overnight care; 5. Hospitals; 6. Marae (building only); or 7. Place of assembly. except that: a. sub clause f. above is not applicable in relation to electronic transmission. b. sub clause g. above is not applicable in relation to noise or electronic transmission.
Transpower New Zealand Limited	159.21	Definitions	Definitions	Sensitive Environment	The submitter has a neutral position on the definition, but notes there is a risk that the agglomeration of environments with different sensitivities and high order policy direction may result in unintended consequences.	Retain as notified, subject to care being taken to ensure that the use of the term does not have any unintended consequences.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Transpower New Zealand Limited	159.22	Definitions	Definitions	Tower [in relation to Energy and Infrastructure Chapter]	Considers the definition is generally consistent with the definition in the NESETA.	Retain as notified.
Transpower New Zealand Limited	159.23	Definitions	Definitions	Transmission Line	Considers the definition appropriately references the NESETA.	Retain the definition of Transmission Line as notified, subject to a minor amendment to correct a typo as follows: <i>...has the same meaning as in the National Environment Standards ELECTRICITY TRANSMISSION ACTIVITIES 2009, which <u>menas means [...]</u></i>
Transpower New Zealand Limited	159.24	Definitions	Definitions	Upgrading / Upgrade	Supports the definition and in particular the clarity with which upgrading is distinguished from 'repair' and 'maintenance'. However, suggests that 'replacement be explicitly excluded from this definition'.	Amend Upgrading / Upgrade as follows: <i>means the <u>replacement</u>, renewal or improvement of infrastructure that results in an increase in carrying capacity, but excludes repair, <u>replacement</u> and maintenance.</i>
Transpower New Zealand Limited	159.25	SD - Strategic Direction	Interpretation	General	Considers that it is critical that the Plan clearly states the purpose of the Strategic Direction objectives so that there is no ambiguity in future RMA processes, including in respect of whether there is a hierarchy within the Plan. The submitter supports the interpretation guidance to the extent that it anticipates that other objectives and policies are consistent with the Strategic Direction objectives and because it is clear there is no hierarchy within the Strategic Direction objectives. However, the submitter suggests that the 'interpretation' should also be explicit in respect of the role of the Strategic Direction objectives in the consideration of a notice of requirement for a designation.	Amend the ' Interpretation ' section in Strategic Directions Chapter as follows: <i>For plan development, including plan changes, the objectives in the Strategic Directions and Urban Form and Development chapters provide direction for the development of the more detailed provisions contained elsewhere in the District Plan in relation to strategic issues. For plan implementation (including the determination of resource consent applications <u>and the consideration of notices of requirement for designations</u>):</i> <i>1. the strategic objectives provide high level direction on what the related objectives and policies in other chapters of the Plan are seeking to achieve in relation to the strategic issues. The topic and geographic-specific chapters provide the detailed guidance;</i> <i>2. the relevant objectives and policies of the plan (including strategic objectives in these chapters) are to be considered together. No fixed hierarchy exists between the strategic objectives <u>or between the strategic objectives and the objectives and policies in other chapters of the Plan.</u></i>
Transpower New Zealand Limited	159.26	SD - Strategic Direction	Objectives	SD-O2 The Natural and Historic Environment	Considers the Objective reflects the matters in section 6 of the RMA.	Retain as notified.
Transpower New Zealand Limited	159.27	SD - Strategic Direction	Objectives	SD-O3 Climate Change	Supports the objective but considers it should recognise the central role that renewable electricity generation, electricity transmission and distribution play in achieving NZ's decarbonisation requirements.	Amend SD-O3 Climate Change as follows: <i>The effects of climate change are recognised and an integrated management approach is adopted, including through:</i> <i>i. taking climate change into account in natural hazards management;</i> <i>ii. enabling the community to adapt to climate change;</i> <i>iii. encouraging efficiency in urban form and settlement patterns;_</i> <i><u>iv. recognising the important role renewable electricity play in achieving New Zealand's net carbon zero target by providing for renewable electricity generation, electricity transmission and electricity distribution.</u></i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Transpower New Zealand Limited	159.28	SD - Strategic Direction	Objectives	SD-O4 Natural Hazards	Supports the objective but considers it should better reflect section 6(h) of the RMA.	Amend Objective SD-04 Natural Hazards as follows: <i>Significant nNatural hazards risks are addressed so that:</i> [...]
Transpower New Zealand Limited	159.29	SD - Strategic Direction	Objectives	SD-O8 Infrastructure	Supports the objective as it gives effect to the Objective and Policies 1 and 2 of the NPSET.	Retain as notified.
Transpower New Zealand Limited	159.30	UFD - Urban Form and Development	Objectives	UFD-O1 Settlement Patterns	Supports the objective but considers amendments will remove the lack of clarity in clause (iii), which is also considered overly onerous and not an approach required by the NPSUD. Also, the suggested change to clause (x) will remove the requirement to 'avoid', which is inconsistent with the 'minimise' approach taken elsewhere in the PDP.	Amend UFD-O1 Settlement Patterns as follows: <i>A consolidated and integrated settlement pattern that:</i> <i>i. efficiently accommodates future growth and capacity for commercial, industrial, community and residential activities, primarily within the urban areas of the Timaru township, and the existing townships of Temuka, Geraldine, and Pleasant Point;</i> <i>ii. is integrated with the efficient use of infrastructure;</i> <i>iii. reduces adverse effects on the environment, including energy consumption, carbon emissions and water use;</i> [...] <i>x. controls the location of activities, primarily by zoning, to <u>manage minimise</u> conflicts between incompatible activities and avoid these where there may be significant adverse effects.</i>
Transpower New Zealand Limited	159.31	EI - Energy and Infrastructure	Introduction	General	Considers the reference to, and direction given, in respect of the NPSET and NESETA, is appropriate.	Retain as notified.
Transpower New Zealand Limited	159.32	EI - Energy and Infrastructure	Objectives	EI-O1 Regionally Significant Infrastructure	Supports the objective insofar as it relates to the National Grid, and gives effect to the NPSET and CRPS.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Transpower New Zealand Limited	159.33	EI - Energy and Infrastructure	Objectives	EI-O2 Adverse effects of Regionally Significant Infrastructure	<p>The submitter does not support the objective in so far as it relates to the National Grid. The reasons include:</p> <ol style="list-style-type: none"> 1. The requirement to avoid adverse effects is overly onerous and not consistent with the NPSET nor Policy 16.3.4 of the CRPS. 2. It is more stringent than the approach to other infrastructure. 3. The requirement to achieve all relevant objectives in underlying zones is overly onerous and inconsistent with sections 104 and 171 of the RMA. 4. The requirement to avoid adverse effects does not give effect to provisions of the CRPS, including Policy 5.3.9 or the requirement to facilitate the operation and development of the National Grid in the objective of the NPSET. <p>[Refer original submission for full reason]</p>	<p>Amend EI-O2 Adverse effects of Regionally Significant as follows:</p> <p><u>1. The adverse effects of Regionally Significant Infrastructure and Lifeline Utilities on the identified characteristics and values of sensitive environments are avoided where it is practicable to do so having regard to the:</u></p> <p>1. are avoided in sensitive environments unless there is a functional or operational need for the infrastructure to be in that location, in which case they must be remedied or mitigated; and</p> <p>2. are avoided, remedied or mitigated in all other cases to achieve the relevant objectives for the underlying zone in other areas.</p>
Transpower New Zealand Limited	159.34	EI - Energy and Infrastructure	Objectives	EI-O4 Adverse effects on Regionally Significant Infrastructure and Lifeline Utilities	<p>Supports the extent to which the objective relates to the National Grid, as it gives effect to Policy 10 and Policy 11 of the NPSET. The submitter considers the word 'efficient' is unnecessary, and not consistent with NPSET and Policy 16.3.4 of the CRPS.</p>	<p>Amend EI-O4 Adverse effects of Regionally Significant and Lifeline Utilities as follows:</p> <p>The efficient operation, maintenance, repair, upgrading or development of Regionally Significant Infrastructure and lifeline utilities are not constrained or compromised by the adverse effects of subdivision, use and development, including reverse sensitivity effects.</p>
Transpower New Zealand Limited	159.35	EI - Energy and Infrastructure	Policies	EI-P1 Recognising the benefits of Regionally Significant Infrastructure and Lifeline Utilities	<p>Supports (insofar as the Objective relates to the National Grid) but seeks the inclusion of an additional clause, similar to that</p>	<p>Amend EI-P1 Recognising the benefits of Regionally Significant Infrastructure and Lifeline Utilities as follows:</p>
				Significant Infrastructure and Lifeline Utilities	<p>included for renewable electricity generation, in order to fully give effect to the NPSET.</p>	<p>Recognise the benefits of Regionally Significant Infrastructure and Lifeline Utilities by:</p> <p>[...]</p> <p><u>x. allowing the establishment of new, and the development of, National Grid assets.</u></p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Transpower New Zealand Limited	159.36	EI - Energy and Infrastructure	Policies	EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other Infrastructure	<p>Considers the Policy fails to reflect the nuanced approach to the management of adverse effects set out in NPSET Policies 7, 8 and 9, and the relevant considerations in NPSET Policies 3, 4 and 5. The submitter notes it is more efficient and effective to include a standalone policy on the effects of the National Grid.</p> <p>[Refer original submission for full reason]</p>	<p>1. Amend EI-P2 Managing adverse effects of Regionally significant Infrastructure and other Infrastructure as follows:</p> <p><i>Except as provided for by Policy EI-PX, provide for Regionally Significant Infrastructure and other infrastructure where any adverse effects are appropriately managed by: [...]</i></p> <p>AND</p> <p>2. Insert a new National Grid specific policy as follows:</p> <p><u>Policy EI-PX</u></p> <p><i>Managing adverse effects of the National Grid Provide for the operation, maintenance, repair, replacement, upgrade and development of the National Grid where any adverse effects are appropriately managed by:</i></p> <p><i>1. enabling the ongoing operation, maintenance, repair, replacement and minor upgrading of existing National Grid assets;</i></p> <p><i>2. when providing for new, or upgrades that are more than minor to, National Grid:</i></p> <p><i>a. In urban environments, avoid adverse effects of the National Grid on town centres, areas of high recreation value and existing sensitive activities;</i></p> <p><i>b. in the coastal environment, recognising that there will be areas where avoidance of adverse effects is required to protect the special values and characteristics of those areas;</i></p> <p><i>c. where (a) and (b) do not apply, seek to avoid adverse effects on the characteristics and values of the following:</i></p> <p><i>i. significant natural areas listed in SCHED7,</i></p> <p><i>ii. outstanding natural features and landscapes listed in SCHED8 and SCHED9,</i></p> <p><i>iii. High Naturalness Waterbodies Areas,</i></p> <p><i>iv. areas of high or outstanding natural character,</i></p> <p><i>v. historic heritage sites listed in SCHED3-4,</i></p> <p><i>vi. sites and areas of significance to Kāti Huirapa listed in SCHED6,</i></p> <p><i>vii. visual amenity landscapes listed in SCHED10, and</i></p> <p><i>3. where it is not practicable to avoid, adverse effects on the characteristics and values of the areas listed in (2), remedy or mitigate adverse effects having regard to:</i></p> <p><i>a. the operational needs or functional needs of the National Grid and the extent to which those requirements constrain measures to avoid, remedy or mitigate adverse effects;</i></p> <p><i>b. the extent to which significant adverse effects are avoided;</i></p> <p><i>c. the extent to which any adverse effects have been avoided, remedied or mitigated by route, site and method selection;</i></p> <p><i>d. for upgrades, the extent to which existing adverse effects have been reduced as part of any substantial upgrade;</i></p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
						<p><i>e. the extent to which adverse effects on urban amenity have been minimised; and</i></p> <p><i>4. outside of the areas listed in (2), avoiding, remedying, or mitigating other adverse effects, having regard to the matters in (3).</i></p> <p><i>5. In the event of conflict between clause (2) (c) and Policy SASM-P5, SASM-P6, SASM-P7 or SASM-P8, clause 2(c) prevails.</i></p> <p><i>6. In the event of conflict between clause 2(c) and Policy NATC-P4 or NATC-P6 clause 2(c) prevails.</i></p>
Transpower New Zealand Limited	159.37	EI - Energy and Infrastructure	Policies	EI-P3 Adverse effects on Regionally Significant Infrastructure	Considers the policy gives effect to Policy 10 and Policy 11 of the NPSET and Policy 16.3.4 of the CRPS.	Retain as notified.
Transpower New Zealand Limited	159.38	EI - Energy and Infrastructure	Rules	Note	<p>Considers that it is critical that the Proposed District Plan is clear in respect of which rules apply to infrastructure. Considers that the most succinct approach is for such rules to be located in a single chapter and that the Zone rules do not apply.</p> <p>[Refer original submission for full reason]</p>	<p>Amend the Note that is related to the Rules in the EI chapter as follows:</p> <p>Note: <i>Activities not listed in the rules of this chapter are classified as a permitted under this chapter.</i></p> <p><i>Rules in Sections A - Section F of this chapter take precedence over rules in any Zone Chapter of Part 3 - Area Specific Matters - Zone Chapters and the Zone Chapter rules do not apply. Unless otherwise specified in this chapter, the provisions of Development Area Chapter, Designation Chapter and Chapters in Part 2 - District-wide Matters Chapters still apply to activities provided for in Sections A - Section F and therefore resource consent may be required by the rules in Part 2.</i></p> <p>[...]</p>
Transpower New Zealand Limited	159.39	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R1 Maintenance and repair, or removal of infrastructure not otherwise addressed by another rule in this chapter	Considers the rule gives effect to Policy 2 and Policy 5 of the NPSET. Seeks that the relationship between this Policy and other policies is considered and addressed so that any conflict is reconciled.	Retain as notified.
Transpower New Zealand Limited	159.40	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R2 Upgrading of underground Infrastructure, not otherwise addressed by another rule in this chapter	Supports the rule but notes it is more stringent than Rule EI-R3 that provides for new underground infrastructure.	<p>Either:</p> <p>1 Amend EI-R2 Upgrading of underground infrastructure, not otherwise addressed by another rule in this chapter as follows:</p> <p>All Zones</p> <p>Activity status: Permitted</p> <p>Where</p> <p>PER-1</p> <p>EI-S2 is complied with</p> <p>OR</p> <p>2. Merge E1-R2 with E1-R3.</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Transpower New Zealand Limited	159.41	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R3 New underground infrastructure (including customers connections) not otherwise addressed by another rule in this chapter	Subject to the submitter's submission in relation to Rule EI-R2, this rule is supported as it gives effect to Policy 1 and Policy 2 of the NPSET.	Retain as notified.
Transpower New Zealand Limited	159.42	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R4 Upgrading of above ground network utilities not otherwise addressed by another rule in this chapter	Supports the rule insofar as it relates to the National Grid and considers it gives effect to Policy 2 and Policy 5 of the NPSET.	Retain as notified.
Transpower New Zealand Limited	159.43	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R5 Vehicle access tracks for network utilities, including ancillary access tracks	Supports the rule, insofar as it relates to the National Grid, gives effect to Policy 1, Policy 2 and Policy 5 of the NPSET.	Retain as notified.
Transpower New Zealand Limited	159.44	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R7 Temporary network utilities, including generators	Supports the rule, insofar as it relates to the National Grid, gives effect to Policy 1, Policy 2 and Policy 5 of the NPSET.	Retain as notified.
Transpower New Zealand Limited	159.45	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R8 Substations (including switching stations) and energy storage batteries not enclosed within a building	Supports the rule insofar as it relates to the National Grid, gives effect to Policy 1 and Policy 2 of the NPSET.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Transpower New Zealand Limited	159.46	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R9 New network utilities within existing fully enclosed buildings	Supports the rule, insofar as it relates to the National Grid, gives effect to Policy 1 and Policy 2 of the NPSET.	Retain as notified.
Transpower New Zealand Limited	159.47	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R11 New overhead lines and associated support structures that convey electricity excluding customer connections	Supports the rule, insofar as it relates to the National Grid, gives effect to Policy 1 and Policy 2 of the NPSET.	Retain as notified.
Transpower New Zealand Limited	159.48	EI - Energy and Infrastructure	Rules Section B - Rules for Telecommunication and radiocommunication activities	EI-R18 Network utilities emitting electric and magnetic fields	Considers the rule ought to apply to the activities in Section A in order to give effect to Policy 9 of the NPSET.	Relocate Rule EI-R18 to Section A.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Transpower New Zealand Limited	159.49	EI - Energy and Infrastructure	Rules Section D - Rules for the National Grid	EI-R27 Buildings or structures within the National Grid Yard	Supports the rule and, in conjunction with related provisions, gives effect to Policy 10 and Policy 11 of the NPSET and Policy 16.3.4 of the CRPS. However, the submitter notes duplication and the need to reflect the evolving nationally consistent approach to giving effect to the NPSET, including in respect of the default to non-complying activity status.	<p>Amend as follows:</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1</p> <p><i>In the National Grid Yard:</i></p> <ol style="list-style-type: none"> any alteration or addition to an existing building or structure for a sensitive activity does not involve an increase in the building height for network utility structures or footprint; or it is a network utility undertaken by a network utility operator (other than for the reticulation and storage of water in canals, dams or reservoirs including for irrigation purposes); or it is a non-habitable building or structure for primary production in the Rural Zones, including yards for milking/dairy sheds and artificial crop protection structures (but does not include any building for intensive primary production, commercial greenhouses or milking/dairy sheds); or it is a yard for milking/dairy sheds; or it is an artificial crop protection and support structure; or it is not for the storage and/or handling of hazardous substances with explosive or flammable intrinsic properties; and <p>PER-2</p> <p><i>In the National Grid Yard, the building or structure is located at least 12m from the outer visible edge of any National Grid tower or pole and associated stay wire, unless it does not permanently physically obstruct existing vehicular access to a National Grid support structure and it is one of the following:</i></p> <ol style="list-style-type: none"> a network utility undertaken by a network utility operator (other than for the reticulation and storage of water in canals, dams or reservoirs including for irrigation purposes); or a fence no greater than 2.5m high and that is no closer than 5m to the nearest National Grid pole; or no closer than 6m to the nearest National Grid tower; or <p>[...]</p>

Transpower New Zealand Limited	159.50	EI - Energy and Infrastructure	Rules Section D - Rules for the National Grid	EI-R28 Earthworks, and land disturbance for the installation of fence posts within the National Grid Yard	<p>Supports the rule but considers the approach to the management of earthworks in the National Grid Yard, should be refined to ensure earthworks can be undertaken safely and appropriately, without the National Grid being compromised. Considers a 'default' to non-complying activity status is appropriate, as the restricted discretionary activity status is not sufficient or appropriate to give effect to Policy 10 of the National Policy Statement on Electricity Transmission or Policy 16.3.4 of the Canterbury Regional Policy Statement.</p> <p>Amendments are also sought to better mirror mandatory requirements in applicable standards.</p> <p>[Refer original submission for full reason]</p>	<p>Amend EI-R28 Earthworks, and land disturbance for the installation of fence posts within the National Grid Yard as follows:</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1</p> <p>The depth of the earthworks or land disturbance is:</p> <ol style="list-style-type: none"> is no greater than 300mm deep within 6-12 metres of the outer visible edge of a foundation of a National Grid transmission line tower or pole; and the work does not compromise the stability of a National Grid transmission line tower or pole; or x. does not result in a reduction in the ground to conductor clearance distances below what is required by Table 4 of NZECP34:2001 (New Zealand Electrical Code of Practice for Electrical Safe Distances); x. does not result in existing vehicle access to a National Grid support structure being permanently obstructed; except that clauses (1a) to and (xb) do not apply to: <ol style="list-style-type: none"> the repair or resealing of a road, footpath, driveway or farm track; and excavation of a vertical hole, not exceeding 500mm in diameter, that is more than 1.5m from outer visible edge of foundation of a National Grid transmission line pole or stay wire. <p>Activity status when compliance not achieved: <u>Non-complying Restricted Discretionary</u></p> <p>Matters over which discretion is restricted:</p> <ol style="list-style-type: none"> effects on the operation, maintenance, upgrading and development of the National Grid; and the risk to the structural integrity of the National Grid support structure(s); and any impact on the ability to access the National Grid; and the risk of electrical hazards affecting public or individual safety and the risk of property damage; and the outcome of any consultation with the owner and operator of the National Grid." <p>and insert the following new Rule in EI-R28:</p> <p>AND insert new rule within EI-R28 as follows:</p> <p>Activity status:</p> <p><u>Restricted Discretionary</u></p> <p>Where:</p> <p><u>RDIS-1</u></p> <p><u>The earthworks or land disturbance:</u></p> <ol style="list-style-type: none"> <u>is greater than 300mm deep and less than 3 metres deep between 6 metres and 12 metres of the outer visible edge of a foundation of a National Grid transmission line tower or pole;</u> <u>does not compromise the stability of a National Grid transmission line tower or pole;</u>
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Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
						<p><u>3. does not result in a reduction in the ground to conductor clearance distances below what is required by Table 4 of NZECP34:2001 (New Zealand Electrical Code of Practice for Electrical Safe Distances); or</u></p> <p><u>4. does not result in existing vehicle access to a National Grid support structure being permanently obstructed; except that 3. clauses (1) to (4) do not apply to:</u></p> <p style="padding-left: 40px;"><u>a. the repair or resealing of a road, footpath, driveway or farm track; and</u></p> <p style="padding-left: 40px;"><u>b. excavation of a vertical hole, not exceeding 500mm in diameter, that is more than 1.5m from outer visible edge of foundation of a National Grid transmission line pole or stay wire.</u></p> <p><u>Matters over which discretion is restricted:</u></p> <p><u>1. effects on the operation, maintenance, upgrading and development of the National Grid; and</u></p> <p><u>2. the risk to the structural integrity of the National Grid support structure(s); and</u></p> <p><u>3. any impact on the ability to access the National Grid; and</u></p> <p><u>4. the risk of electrical hazards affecting public or individual safety and the risk of property damage; and</u></p> <p><u>5. the outcome of any consultation with the owner and operator of the National Grid.”</u></p> <p><u>Activity status when compliance not achieved: Non-complying</u></p>
Transpower New Zealand Limited	159.51	EI - Energy and Infrastructure	Rules Section D - Rules for the National Grid	EI-R29 Subdivision of land within the National Grid Subdivision Corridor	Supports the rule and considers that, in conjunction with related provisions, gives effect Policy 10 and Policy 11 of the NPSET and Policy 16.3.4 of the CRPS.	Retain as notified.
Transpower New Zealand Limited	159.52	EI - Energy and Infrastructure	Rules Section D - Rules for the National Grid	EI-R30 Sensitive activities, including within an existing building or the erection of buildings for sensitive activities, within the National Grid Yard	Supports the rule and considers that, in conjunction with related provisions, gives effect Policy 11 of the NPSET and Policy 16.3.4 of the CRPS.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Transpower New Zealand Limited	159.53	EI - Energy and Infrastructure	Standards	EI-S1 Maximum structure height for network utility structures of poles, antenna, towers and telecommunication poles (including the combined height of poles and antenna)	The submitter generally supports the standard and considers it appropriately manages the potential effects of infrastructure activities.	Retain as notified.
Transpower New Zealand Limited	159.54	EI - Energy and Infrastructure	Standards	EI-S2 Upgrading infrastructure	Considers the standard appropriately manages the potential effects of infrastructure activities and is generally consistent with the Regulations in the NESETA.	Retain as notified.
Transpower New Zealand Limited	159.55	SW - Stormwater Management	Policies	SW-P3 Connection to reticulated stormwater networks	Does not support the absolute requirement to connect to the Council's stormwater network. The submitter is concerned that alternative stormwater disposal options are not provided for that may be more appropriate in some circumstances. These circumstances include stormwater discharges from substation sites.	Amend SW-P3 Connection to reticulated stormwater networks as follows: <i>Except where Policy SW-P4 applies or where stormwater is able to be managed within a site that accommodates Regionally Significant Infrastructure, require all subdivision, use and development to connect to the Council's reticulated stormwater network within reticulated infrastructure boundaries, to:</i> <i>1. ensure that stormwater does not create increased flood risk on other properties; and</i> <i>2. manage stormwater quality impacts through an integrated management approach.</i>
Transpower New Zealand Limited	159.56	TRAN - Transport	Standards	TRAN-S5 Cycle parking provision	Supports the exemption for un-staffed network utilities, as this appropriately reflects the characteristics of many network utilities (and their limited need to transport related facilities).	Retain the network utility exemptions in TRAN-S5 as notified.
Transpower New Zealand Limited	159.57	TRAN - Transport	Standards	TRAN-S7 Minimum loading space requirements	Supports the exemption for un-staffed network utilities, as this appropriately reflects the characteristics of many network utilities (and their limited need to transport related facilities).	Retain the network utility exemptions in TRAN-S7 as notified.
Transpower New Zealand Limited	159.58	CL - Contaminated Land	Objectives	CL-O1 Management of contaminated land	Supports the intent but suggests it should be expressed as an outcome and should better align to the implementing policies.	Amend Objective CL-O1 Management of contaminated land as follows: <i>Contaminated land is made safe for human health and its intended use before any The change of use, land disturbance, development or subdivision of contaminated land does not increase the risk to human health.</i>
Transpower New Zealand Limited	159.59	CL - Contaminated Land	Rules	Note	Supports the approach to rules (or the absence of rules) in relation to contaminated land and particularly reliance of the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011.	Retain the Note as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Transpower New Zealand Limited	159.60	NH - Natural Hazards	Objectives	NH-O2 Regionally Significant Infrastructure	Supports that the PDP does not prevent the location of regionally significant infrastructure in such areas. However, considers that the provisions fail to acknowledge that the National Grid is able to be located (and is appropriately designed to do so) in areas of high natural hazards without exacerbating risk to other, compromising electricity transmission or resulting in inappropriate risks or adverse effects on the National Grid itself.	Amend Objective NH-O2 Regionally Significant Infrastructure as follows: <i>Risk from natural hazards to Regionally Significant Infrastructure is <u>managed by locating located</u> outside of high hazard areas where practicable.</i>
Transpower New Zealand Limited	159.61	NH - Natural Hazards	Policies	NH-P5 Subdivision and Regionally significant infrastructure in Liquefaction Awareness Areas	Acknowledges that the policy references regionally significant infrastructure (but not all structures) on the basis that the Building Act addresses other buildings, but considers: - the relationship between Policies NH-P5 and NH-P6 and NH-P11 is unclear; and - the reference to regionally significant infrastructure in Policy NH-P5 and Policy NH-P6 is unnecessary duplication;	Amend NH-P5 Subdivision and infrastructure in Liquefaction Awareness Area as follows: <i>NH-P5 Subdivision and Regionally Significant Infrastructure in Liquefaction Awareness Areas</i> <i>Require subdivision and Regionally Significant Infrastructure in Liquefaction Awareness Areas to apply appropriate measures to avoid or, where avoidance is not reasonably practicable due to the functional needs of the activity, mitigate risks to people and property.</i>
					- the reference to regionally significant infrastructure (but not other activities) results in more onerous provisions applying to regionally significant infrastructure when compared to other activities.	
Transpower New Zealand Limited	159.62	NH - Natural Hazards	Policies	NH-P6 Subdivision and Regionally significant Infrastructure In Earthquake Fault Awareness Areas	Acknowledges that the policy references regionally significant infrastructure (but not all structures) on the basis that the Building Act addresses other buildings, but considers: - the relationship between Policies NH-P5 and NH-P6 and NH-P11 is unclear; and - the reference to regionally significant infrastructure in Policy NH-P5 and Policy NH-P6 is unnecessary duplication; - the reference to regionally significant infrastructure (but not other activities) results in more onerous provisions applying to regionally significant infrastructure when compared to other activities.	Amend Policy NH-P6 Subdivision and Regionally significant In Earthquake Fault Awareness Area as follows: <i>NH-P6 Subdivision and Regionally Significant Infrastructure in Earthquake Fault Awareness Areas</i> <i>Require subdivision and Regionally Significant Infrastructure in the Earthquake Fault Awareness Areas overlay to be designed or located in a way that avoids or, where avoidance is not reasonably practicable due to the functional needs of the activity, mitigates risks to people and property."</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Transpower New Zealand Limited	159.63	NH - Natural Hazards	Policies	NH-P11 Regionally Significant Infrastructure in Natural Hazard Areas	Supports there is a specific policy to address regionally significant infrastructure in natural hazard areas however, the “only allow” direction is not supported. Since, NH-O2 relates to high hazard areas, the submitter considers that this policy should be confined similarly.	Amend NH-P11 Regionally Significant Infrastructure in Natural Hazard Areas as follows: NH-P11 Regionally Significant Infrastructure in Natural High Hazard Areas <i>Only allow Regionally Significant Infrastructure in Natural High Hazard Areas where:</i> <i>1. it has an operational need or functional need for the location and there are no feasible alternative locations; and</i> <i>2. it is designed to maintain its integrity and function during and after a natural hazard event, or it is able to be readily re-instated after a natural hazard event; and</i> <i>3. it is designed and located to ensure that it will not exacerbate the risks or potential adverse effects of the natural hazard on surrounding land.</i> [...]
Transpower New Zealand Limited	159.64	NH - Natural Hazards	Rules	NH-R5 Regionally Significant Infrastructure - Maintenance, replacement and upgrading	Supports that the rule provides for the maintenance and upgrading of regionally significant infrastructure. The submitter notes the rule applies to existing regionally significant infrastructure and as such, the infrastructure is already located in the various overlays. PER-2 is not supported as it is not clear how this standard would apply to a transmission line.	Amend Rule NH- R5 Regionally Significant Infrastructure - Maintenance, replacement and upgrading as follows: NH-R5 Regionally Significant Infrastructure - maintenance, repair, replacement and upgrading Flood Assessment Area Overlay High Hazard Area Overlay Earthquake Fault (infrastructure or facilities) Awareness Area Overlay Activity status: Permitted Where: PER-1 <i>The infrastructure is within 5m of the existing alignment or location; and</i> PER-2
						<i>“The above ground footprint of any structure of the infrastructure is not increased by more than 10%;</i> [...]
Transpower New Zealand Limited	159.65	NH - Natural Hazards	Rules	NH-R6 Regionally Significant Infrastructure - New NH-R6.1 does not apply if: [...]	Supports that the rule provides for new regionally significant infrastructure. But the exceptions to Rule NH-R6.1 need to clarify whether they relate to the footprint of a structure (and not any overhead lines component). It is critical that this exemption applies to the submitter given the linear nature of the National Grid and in order to give effect to the NPSET.	Amend the heading of NH-R6 Regionally Significant Infrastructure - New [...] as follows: NH-R6 Regionally Significant Infrastructure - New NH-R6.1 and NH-R6.2 does not apply if: 1. the infrastructure is below ground; or 2. above ground infrastructure where any structure is less than 10m and is not located within a high hazard area as determined under NH-S1; or 3. the structure is located within a road corridor. NH-R6.4 shall not apply to buildings and infrastructure where any structure is less than 10m² in area [...]

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Transpower New Zealand Limited	159.66	HS - Hazardous Substances	General	General	The submitter assumes the adverse effects of the use and storage of hazardous substances in the National Grid Yard are addressed in the EI- Energy and Infrastructure chapter, therefore, is neutral on the hazardous substances provisions. The submitter outlines that within the National Grid Yard, their nationally consistent approach to the management of activities includes seeking that the storage and uses of hazardous substances with explosive or flammable properties (at greater than domestic quantities) is a non-complying activity.	1. Retain the HS - Hazardous Substances Chapters as notified; AND 2. Include a rule in the EI- Energy and Infrastructure Chapter to address the use and storage of hazardous substances in the National Grid Yard.
Transpower New Zealand Limited	159.67	SASM - Sites and Areas of Significance to Māori	Policies	SASM-P8 Protection of wāhi taoka, wāhi tapu, wai taoka and wai tapu sites and areas	Supports that clause (3) provides for circumstances where effects cannot be avoided in a manner that is consistent with Policies 3 and 4 of the NPSET. But 'operational need' should be included.	Amend SASM-P8 Protection of wāhi taoka, wāhi tapu, wai taoka and wai tapu sites and areas as follows: <i>Where an activity is proposed within any of the wāhi taoka sites, wāhi tapu sites, wai taoka areas and wai tapu areas listed in SCHED6 - Schedule of Sites and Areas of Significance to Kāti Huirapa, ensure that:</i> [...] 3. any adverse effects on identified values are avoided unless it can be demonstrated that: <i>a. due to the functional needs <u>or operational needs</u> of the activity, it is not <u>practicable possible</u> to avoid all adverse effects; and</i> <i>b. any residual effects that cannot be practicably avoided are mitigated, as far as <u>practicable possible</u>, in a way that protects, maintains or enhances the overall values of the site or area; and</i> <i>c. where any historical loss of values can be remediated.</i>
Transpower New Zealand Limited	159.68	SASM - Sites and Areas of Significance to Māori	Rules	General	Generally supports the rules and the manner in which the sites are identified in SCHED6 so that the Rules are clear and certain.	Retain as notified.
Transpower New Zealand Limited	159.69	SASM - Sites and Areas of Significance to Māori	Rules	General	Supports the matters of discretion that relate to the rules for activities in Sites and Areas of Significance to Māori, but considers that reference to the benefits of network utilities is required to give effect to the NPSET.	Amend all the matters of discretion of the Rules in SASM chapter as follows: Matters of discretion are restricted to: <i>X. In respect of utilities, <u>the local, regional and national benefits of the utility and</u> the extent to which the proposed utility has functional needs <u>or operational needs</u> for its location.</i>
Transpower New Zealand Limited	159.70	ECO - Ecosystems and Indigenous Biodiversity	Policies	ECO-P2 Appropriate indigenous vegetation clearance in significant natural areas	Supports that the policy enables indigenous vegetation clearance for the operation, maintenance or repair of the National Grid. However, considers that the policy should provide for the upgrade of the National Grid, consistent with the NESETA and to give effect to the NPSET.	Amend ECO-P2 Appropriate indigenous vegetation clearance in significant natural areas as follows: <i>Provide for the clearance of indigenous vegetation in Significant Natural Areas where it is appropriate for health and wellbeing or customary reasons, by enabling clearance:</i> [...] <i>5.for the operation, maintenance, or repair <u>or upgrade</u> of the National Grid and public roads.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Transpower New Zealand Limited	159.71	ECO - Ecosystems and Indigenous Biodiversity	Policies	ECO-P5 Protection of Significant Natural Areas	Supports the inclusion of an explicit cross reference to the Policy EI-P2 and considers that providing the direction in respect of the regionally significant infrastructure and significant natural areas in one place avoids duplication and the potential for conflict.	Amend ECO-P5 Protection Significant Natural Areas as follows: <i>Avoid the clearance of indigenous vegetation and earthworks within SNAs, unless these activities:</i> [...] <i>2. are for regionally significant infrastructure and it can be demonstrated that adverse effects are managed in accordance with EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure <u>or, for the National Grid, EI-Px Managing adverse effects of the National Grid.</u></i>
Transpower New Zealand Limited	159.72	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R3 Clearance of indigenous vegetation associated with the National Grid	Supports that the rule enables indigenous vegetation clearance for the operation, maintenance or repair of the National Grid. However, considers that the policy should provide for the upgrade of the National Grid, consistent with the NESETA and to give effect to the NPSET.	Amend ECO-R3 Clearance of indigenous vegetation associated with the National Grid as follows: [...] PER-1 <i>The vegetation clearance is to provide for the operation, maintenance, or repair <u>or upgrade</u> of the National Grid, including maintenance of existing access to National Grid support structures; and</i> [...]
Transpower New Zealand Limited	159.73	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R5 Earthworks in a Significant Natural Area	Supports the consenting pathway for earthworks for the operation, maintenance, repair, upgrade and development of the National Grid. Considers that a permitted activity status is provided in situations where land is likely to have been disturbed and cleared in the past, to provide upgrading of the National Grid.	Amend ECO-R5 Earthworks in a Significant Natural Area as follows: Activity status: Restricted discretionary <u>Permitted</u> Where: RDIS-PER-1 The earthworks are within 2m, and for the purpose, of the maintenance, repair, or replacement <u>or upgrade</u> of existing lawfully established vehicle tracks, roads, walkways, firebreaks, drains, ponds, dams, waterlines, waterway crossings, or utilities. [...]
Transpower New Zealand Limited	159.74	NATC - Natural Character	Policies	NATC-P4 Preservation of natural character from inappropriate subdivision, use and development	Considers the policy fails to recognise that the National Grid must traverse riparian margins in order to transmit electricity across New Zealand. Further, given that it is not always practicable for the submitter to minimise effects, there is concern that the Policies together may prevent or significantly constrain the ability of the National Grid to cross waterbodies.	Amend NATC-P4 Preservation of natural character from Inappropriate subdivision, use and development as follows: <i>Preserves the natural character values of riparian margins by only allowing subdivision, use and development that:</i> <i>1. avoids, or if avoidance is not possible <u>practicable</u>, minimises any adverse effects on the elements, patterns, processes and experiential qualities outlined in NATC-P1;</i> <i><u>x. is regionally significant infrastructure that has an operational need or functional need for its location;</u></i> <i>2. maintains natural character values which have been modified but are highly valued;</i> <i>3. restores or enhances natural character values in circumstances identified in NATC-P2; and</i> <i>4. avoids or, where that is not possible <u>practicable</u>, does not exacerbate bank erosion.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Transpower New Zealand Limited	159.75	NATC - Natural Character	Policies	NATC-P5 Anticipated activities in riparian margins	Considers the policy fails to recognise that the National Grid must traverse riparian margins in order to transmit electricity across New Zealand. Further, given that it is not always practicable for the submitter to minimise effects, the submitter is concerned that the Policies together may prevent or significantly constrain the ability of the National Grid to cross waterbodies.	Amend Policy NATC-P5 Anticipated activities in riparian margins as follows: <i>Provide for activities in riparian margins which are appropriate for safety, enhancement, wellbeing or customary reasons, by enabling:</i> <i>1. activities which are undertaken by a local authority for the purpose of natural hazard mitigation works, and where possible, any adverse effects on natural character are minimised;</i> <i><u>x. regionally significant infrastructure that has an operational need or functional need for its location;</u></i> <i>2. vegetation clearance to remove pest species</i> [...]
Transpower New Zealand Limited	159.76	NATC - Natural Character	Rules	NATC-R1 Vegetation clearance	Supports that the rule enables vegetation clearance for the operation, maintenance or repair of the National Grid. But seeks that the rule provide for the upgrade of the National Grid consistent with the NESETA and gives effect to the NPSET.	Amend NATC-R1 Vegetation clearance as follows: Riparian Margins of a river that is not an HNWB Activity status: Permitted Where: [...] PER-3 <i>The vegetation clearance is for the operation, maintenance, or repair <u>or upgrade</u> of the National Grid; or</i> [...]
Transpower New Zealand Limited	159.77	NATC - Natural Character	Rules	NATC-R3 Earthworks	Supports the enabling of earthworks for the operation, maintenance or repair of the National Grid seeks that it also provide for the upgrade of the National Grid in a manner that is consistent with the NESETA and gives effect to the NPSET.	Amend NATC-R3 Earthworks as follows: 1. Riparian margins of a river that is not a HNWB Activity status: Permitted Where: [...] PER-4 <i>The earthworks are required for the operation, maintenance, or repair <u>or upgrade</u> of the National Grid.</i> [...] 2 Riparian margins of an HNWB Activity status: Permitted

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
						<p>Where:</p> <p>PER-1 The earthworks are required for the maintenance and repair of existing fences, tracks, roads or natural hazard mitigation works; or</p> <p>PER-2 The earthworks are required for the operation, maintenance, or repair <u>or upgrade</u> of the National Grid.</p>
Transpower New Zealand Limited	159.78	NATC - Natural Character	Rules	General	Supports the matters of discretion but considers the benefits of network utilities and operational need should be included to give effect to the NPSET.	<p>Amend all the matters of discretion in the rules of NATC chapter as follows:</p> <p>Matters of discretion are restricted to:</p> <p><u>x. the local, regional or national benefits of the activity and whether there is a functional need or operational need for the activity to locate in a riparian margin.</u></p>
Transpower New Zealand Limited	159.79	NFL - Natural Features and Landscapes	Policies	NFL-P3 Maintaining and enhancing Visual Amenity Landscapes	Supports the explicit cross-reference to EI-P2 and that providing the direction on regionally significant infrastructure and visual amenity landscapes in one place avoids duplication and the potential for conflict. However, considers that cross-referencing should be consistent across the PDP. The submitter also seeks the inclusion of a further cross-reference.	<p>Amend Policy NFL-P3 Maintaining and enhancing Visual Amenity Landscapes as follows:</p> <p><i>Only allow subdivision, use and development within visual amenity landscapes, that is not provided in NFL-P2, where it can demonstrate:</i></p> <p>[...]</p> <p>3. <i>that the proposal can be visually integrated into the landscape and will not break the skyline or ridgelines;</i></p> <p><u>x. that adverse effects of Regionally Significant Infrastructure are managed in accordance with EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure and EI-Px Managing the effects of the National Grid.</u></p> <p>while taking into account:</p> <p>[...]</p> <p>6. <i>the measures proposed to mitigate the effects on the values and characteristics, including the location, design, scale and finish of any buildings or structures or earthworks, and landscaping;</i> and</p> <p>7. EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure.</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Transpower New Zealand Limited	159.80	NFL - Natural Features and Landscapes	Policies	NFL-P4 Protecting Outstanding Natural Features and Outstanding Natural Landscapes	Supports the explicit cross-reference to the Policy EI-P2 and that providing the direction on regionally significant infrastructure and visual amenity landscapes in one place avoids duplication and the potential for conflict. However, considers that cross-referencing should be consistent across the PDP. The submitter also seeks the inclusion of a further cross-reference.	Amend NFL-P4 Protecting Outstanding Natural Features and Outstanding Natural Landscapes as follows: <i>Avoid subdivision, use and development within outstanding natural features and outstanding natural landscapes that area not provided in NFL-P2, unless it:</i> [...] <i>4. will maintain natural landforms, natural processes and vegetation areas and patterns,</i> <i><u>x. is regionally significant infrastructure that can demonstrate that adverse effects are managed in accordance with EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure and EI-Px Managing the effects of the National Grid.</u></i> <i>while taking into account:</i> [...] <i>7. the measures proposed to mitigate the effects on the values and characteristics, including:</i>
						[...] <i>c. the finish of any buildings or structures, including materials, reflectivity and colour; and landscaping and fencing; and</i> <i>d. EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure.</i>
Transpower New Zealand Limited	159.81	NFL - Natural Features and Landscapes	Rules	NFL-R3 Network utilities including associated earthworks	Considers the rule appropriately provides for the operational, maintenance, upgrading and development of the National Grid in protected landscapes in a manner that gives effect to the NPSET and CRPS.	Retain as notified.
Transpower New Zealand Limited	159.82	PA - Public Access	Policies	PA-P4 Limiting public access	Supports the limitations to public access where necessary for the stability, performance, maintenance and operation of regionally significant infrastructure. The ability to restrict access in the vicinity of the National Grid is necessary to provide for the health and safety of people and communities.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Transpower New Zealand Limited	159.83	SUB - Subdivision	Rules	SUB-R2 Subdivision that creates new allotments solely for the purpose of network utilities, the national grid or roads	Supports that the rule recognises that subdivision for network utilities differs to subdivision for other purposes and as such the standards that are necessary are limited. But considers that the activity status for such subdivision is more stringent than is necessary. The submitter does not consider it is necessary for Council to retain the ability to decline consent for a subdivision for a network utility.	Amend SUB-R2 Subdivision that creates new allotments solely for the purpose of network utilities, the national grid or roads as follows: All zones Activity status: Controlled Permitted Where: CON-PER-1 <i>SUB-S2, SUB-S7 and SUB-S8 are complied with.</i> Matters of control are restricted to: <i>1. The location, size and design of allotments, building platforms, roads, accessways, right of ways, vehicle crossings, open space, reserves, landscaping and connections to the surrounding area; and</i> <i>2. the ability to accommodate permitted and/or intended land uses; and</i> <i>3. the compatibility with the purpose, character and qualities of the zone; and</i> <i>4. the response to the site's and surrounding areas natural and physical features, character, amenity, constraints and vegetation; and</i> <i>5. the provision, location, design, specification, construction, connection and timing of infrastructure, transport links, water sensitive design measures and firefighting water supply; and</i> <i>6. the extent to which infrastructure has capacity to service the subdivision; and</i> <i>7. legal and physical access arrangements; and</i> <i>8. the requirement for any consent notices, covenants, easements, esplanades or public access; and</i> <i>9. measures to avoid, remedy or mitigate adverse effects:</i> <i>a. of any natural hazards or other risks; and</i> <i>b. on any sensitive environments, waterbodies, ecosystems or notable trees; and</i> <i>c. on infrastructure; and</i> <i>d. on existing or permitted adjoining or adjacent land uses; and</i>

					<p>10. the ability of any existing activity on the site to comply with the District Plan and/or existing resource consent; and</p> <p>11. the suitability of any future development that would be enabled as a result of the subdivision; and</p> <p>12. whether it is appropriate that the subdivision prevents, hinders or limits the development of adjoining or adjacent land,</p> <p>13. measures to manage adverse effects.</p> <p>Activity status when compliance not achieved: <u>Restricted Discretionary Controlled</u></p> <p>Where:</p> <p><u>RDIS-CON-1</u></p> <p>Compliance is not achieved with <u>PER-CON-1</u>.</p> <p>Matters of <u>control discretion</u> are restricted to:</p> <ol style="list-style-type: none"> 1. the matters of control relevant to CON-1<u>The location, size and design of allotments, building platforms, roads, accessways, right of ways, vehicle crossings, open space, reserves, landscaping and connections to the surrounding area; and</u> 2. <u>the ability to accommodate permitted and/or intended land uses; and</u> 3. <u>the compatibility with the purpose, character and qualities of the zone; and</u> 4. <u>the response to the site's and surrounding areas natural and physical features, character, amenity, constraints and vegetation; and</u> 5. <u>the provision, location, design, specification, construction, connection and timing of infrastructure, transport links, water sensitive design measures and firefighting water supply; and</u> 6. <u>the extent to which infrastructure has capacity to service the subdivision; and</u> 7. <u>legal and physical access arrangements; and</u> 8. <u>the requirement for any consent notices, covenants, easements, esplanades or public access; and</u> 9. <u>measures to avoid, remedy or mitigate adverse effects:</u> <ol style="list-style-type: none"> a. <u>of any natural hazards or other risks; and</u> b. <u>on any sensitive environments, waterbodies, ecosystems or notable trees; and</u> c. <u>on infrastructure; and</u> d. <u>on existing or permitted adjoining or adjacent land uses; and</u> 10. <u>the ability of any existing activity on the site to comply with the District Plan and/or existing resource consent; and</u> 11. <u>the suitability of any future development that would be enabled as a result of the subdivision; and</u> 12. <u>whether it is appropriate that the subdivision prevents, hinders or limits the development of adjoining or adjacent land,</u> 13. <u>measures to manage adverse effects; and</u>
					<p>14. <u>the matters of discretion of any infringed standard.</u></p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Transpower New Zealand Limited	159.84	CE - Coastal Environment	Policies	CE-P10 Preserving the natural character of the Coastal Environment	Supports the explicit cross reference to the Policy EI-P2 and considers that providing the direction in respect of the regionally significant infrastructure and natural character in the coastal environment in one place avoids duplication and the potential for conflict. The submitter also seeks the inclusion of a further cross-reference.	Amend CE-P10 Preserving the natural character of the Coastal Environment as follows: <i>Enable subdivision, use and development outside of areas of coastal high natural character that:</i> <i><u>x. is regionally significant infrastructure that can demonstrate that adverse effects are managed in accordance with EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure and EI-Px Managing the effects of the National Grid.</u></i> <i>1. avoids significant adverse effects; and</i> <i>2. avoids, remedies or mitigates any other adverse effects on the qualities that contribute to the natural character of the Coastal Environment; while recognising that:</i> <i>a. in rural zoned areas, buildings and structures for non-intensive primary production and residential activities may be appropriate depending on their size, scale and nature;</i> <i>b. for existing urban areas, development will likely be appropriate where it is consistent with the anticipated character and qualities of the zone; and</i> <i><u>c. for infrastructure, the development is in accordance with EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure.</u></i>
Transpower New Zealand Limited	159.85	CE - Coastal Environment	Policies	CE-P11 Preserve the natural character qualities of areas with Coastal High Natural Character	Supports the explicit cross-reference to the Policy EI-P2 and considers that providing the direction in respect of the regionally significant infrastructure and natural character in the coastal environment in one place, avoids duplication and the potential for conflict. The submitter also seeks the inclusion of a further cross-reference.	Amend CE-P11 Preserve the natural character qualities of areas with coastal High Natural Character as follows: <i>Only allow subdivision, use and development in areas of Coastal High Natural Character where:</i> <i>1. for infrastructure, the development is in accordance with EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure <u>and EI-Px Managing the effects of the National Grid;</u> and</i> <i>[...]</i>
Transpower New Zealand Limited	159.86	CE - Coastal Environment	Policies	CE-P13 Regionally Significant Infrastructure in Coastal Hazard Areas	Considers the policy appropriately recognises that there will be situations where infrastructure must be located in hazard areas because of its operational needs or functional needs.	Retain as notified
Transpower New Zealand Limited	159.87	CE - Coastal Environment	Rules	CE-R8 Regionally Significant Infrastructure - New	Considers the rule appropriately provides for regionally significant infrastructure in the coastal environment in a manner that gives effect to the NPSET, the NZCPS and achieves the purpose of the RMA.	Retain as notified.
Transpower New Zealand Limited	159.88	EW - Earthworks	Policies	EW-P4 Infrastructure	Considers the policy gives effect to Policy 10 of the NPSET.	Retain as notified.
Transpower New Zealand Limited	159.89	EW - Earthworks	Standards	EW-S5 Earthworks in proximity of the National Grid [...]	Considers the standard duplicates Rule EI-R28 (including as amended by this submission). Considers the duplication is removed.	1. Delete Standard EW-S5 . AND

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
						2. Include direction to Rule EI-R28 .
Transpower New Zealand Limited	159.90	SIGN - Signs	Rules	SIGN-R1 Official signs	Supports that the rule enables official signs without constraint, including those that relate to the National Grid, thereby providing for the health and safety of people and communities.	Retain as notified.
Transpower New Zealand Limited	159.91	TEMP - Temporary activities	Rules	Note	The submitter supports the 'Note' that accompanies the rules for temporary activities on the basis that it gives clear direction that the rules that relate to activities in the National Grid Yard apply to temporary activities.	Retain the Rules Note in TEMP chapter as notified.
Transpower New Zealand Limited	159.92	GRZ - General Residential Zone	Policies	GRZ-P4 Other non-residential activities and buildings	The submitter outlines the technical needs of the National Grid and that the adverse effects of the National Grid cannot always be minimised. These characteristics of the National Grid are recognised in the Preamble to the NPSET. Considers that the PDP should acknowledge these characteristics by ensuring that there is a policy 'pathway' (as opposed to a policy that may have the effect of preventing the National Grid) for the operation, maintenance, upgrade and development of the National Grid in all zones.	Amend Policy GRZ-P4 Other non-residential activities and buildings as follows: <i>Only allow other non-residential activities and buildings where:</i> 1. <i>they support the wellbeing of residents in the area, or have a functional need <u>or operational need</u> to locate in the zone; and</i> 2. <i>any adverse effects on the residential amenity values are avoided or minimised <u>to the extent practicable</u>; and</i> 3. <i><u>except where the activity is regionally significant infrastructure</u>, they maintain the anticipated character, qualities and purpose of the General Residential Zone.</i>
Transpower New Zealand Limited	159.93	GRZ - General Residential Zone	Policies	GRZ-P5 Incompatible activities	The submitter notes that Policy GRZ-P5 includes a clause referencing Policy GRZ-P4 being 'complied with'. Transpower considers that this terminology is more appropriate in respect of rules and suggests that Policy GRZ-P5 be amended as a consequence.	Amend Policy GRZ-P5 as follows: <i>Avoid activities that are likely to be incompatible or inconsistent with the character, qualities and purpose of the General Residential Zone, unless:</i> [...] 3. <i><u>The activity is consistent with</u> GRZ-P4 Other non-residential activities and buildings <u>is complied with</u>.</i>
Transpower New Zealand Limited	159.94	MRZ - Medium Density Residential Zone	Policies	MRZ-P6 Other non-residential activities	The submitter outlines the technical needs of the National Grid and that the adverse effects of the National Grid cannot always be minimised. Considers that the PDP should acknowledge the characteristics of the National Grid by ensuring that there is a policy 'pathway' (as opposed to a policy that may have the effect of preventing the National Grid) for the operation, maintenance, upgrade and development of the National Grid in all zones.	Amend MRZ-P6 Other non-residential activities as follows: <i>Only allow other non-residential activities and buildings where:</i> 1. <i>they support the wellbeing of residents in the area, or have a functional need <u>or operational need</u> to locate in the zone; and</i> 2. <i>any adverse effects on the residential amenity values are avoided or minimised <u>to the extent practicable</u>; and</i> 3. <i><u>except where the activity is regionally significant infrastructure</u>, they maintain the anticipated character, qualities and purpose of the General-Medium Density Residential Zone.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Transpower New Zealand Limited	159.95	MRZ - Medium Density Residential Zone	Policies	MRZ-P7 Industrial and large format retail activities	The Submitter notes that Policy MRZ-P7 includes a clause referencing Policy MRZ-P6 being 'complied with'. Transpower considers that this terminology is more appropriate in respect of rules and suggests that Policy MRZ-P7 be amended as a consequence.	Amend Policy MRZ-P7(3) Industrial and large format retail activities as follows: <i>Avoid activities that are likely to be incompatible or inconsistent with the character, qualities and purpose of the General residential zone, unless:</i> [...] 3. <i>The activity is consistent with MRZ-P6 is-complied-with.</i>
Transpower New Zealand Limited	159.96	GRUZ - General Rural Zone	Policies	GRUZ-P7 Industrial activities, rural industries and other activities	The submitter outlines the technical needs of the National Grid and that the adverse effects of the National Grid cannot always be minimised. Considers that given the national significance of the National Grid, and order to give effect to the NPSET, the PDP should acknowledge these characteristics of the National Grid by ensuring that there is a policy 'pathway' (as opposed to a policy that may have the effect of preventing the National Grid) for the operation, maintenance, upgrade and development of the National Grid in all zones. In the case of the Rural Zones, it is these zones that are most likely, and most appropriate to accommodate the National Grid. As such, it is important that the Rural Zone provisions do not dissuade the location of the National Grid in the Rural Zones.	Amend GRUZ-P7 Industrial activities, rural industries and other activities as follows: 1. <i>Only allow rural industries and other activities (not listed in the rules) in the General Rural Zone where:</i> [...] <i>x. the activity is regionally significant infrastructure;</i> [...]
Transpower New Zealand Limited	159.97	RLZ - Rural Lifestyle Zone	Policies	RLZ-P9 Other activities	The submitter outlines the technical needs of the National Grid and that the adverse effects of the National Grid cannot always be minimised. Considers that given the national significance of the National Grid, and in order to give effect to the NPSET, the PDP should acknowledge these characteristics of the National Grid by ensuring that there is a policy 'pathway' (as opposed to a policy that may have the effect of preventing the National Grid) for the operation, maintenance, upgrade and development of the National Grid in all zones.	Amend RLZ-P9 Other activities as follows: <i>Only allow rural industries and other activities (not listed in the rules) in the General Rural Zone where:</i> 1. <i>there is a functional or operational need for the activity to locate within the Zone; and-or</i> 2. <i>the scale, intensity and nature of the activity is compatible with the character and qualities of the zone and all adverse effects are minimised; and</i> 3. <i>there is adequate infrastructure available to service the activity, including on-site servicing where reticulated services are not available; and</i> 4. <i>there is adequate water supply provided for firefighting purposes; and</i> 5. <i>the activity will not compromise the efficiency and safety of the roading network</i>
Transpower New Zealand Limited	159.98	SETZ - Settlement Zone	Policies	SETZ-P4 Other activities	The submitter outlines the technical needs of the National Grid and that the adverse effects of the National Grid cannot always be minimised. Considers that given the national significance of the National Grid, and order to give effect to the NPSET, PDP should acknowledge these characteristics of the National Grid by ensuring that there is a policy 'pathway' (as opposed to a policy that may have the effect of preventing the National Grid) for the operation, maintenance, upgrade and development of the National Grid in all zones.	Amend Policy SETZ-P4 Other activities as follows: <i>Only allow other activities where:</i> [...] <i>x. there is a functional or operational need for the activity to locate within the Zone; or</i> [...]

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Transpower New Zealand Limited	159.99	GIZ - General Industrial Zone	Policies	GIZ-P6 Other activities	Generally supports the policy, but considers that the GIZ is an appropriate location for the National Grid (when compared to the residential zones), yet the Policy framework does not direct this outcome.	Amend GIZ-P6 Other activities as follows: <i>Avoid the establishment of other activities including residential activities unless:</i> <u><i>x. the activity is regionally significant infrastructure; or</i></u> <i>1. there is a functional need <u>or operational need</u> for the activity to occur in the General Industrial Zone; or and</i> <i>2. the activity is not provided for in another zone; and</i> <i>3. the activity does not undermine the purpose, viability and function of any of the Commercial and Mixed Use Zones; and</i> <i>4. the activity would not result in reverse sensitivity effects that may constrain industrial activities.</i>
Transpower New Zealand Limited	159.100	NOSZ - Natural Open Space Zone	Policies	NOSZ-P6 Other activities	Considers the policies fail to recognise the existing location of the National Grid within these zones and because the policies may prevent the National Grid from being located in the Zone in a manner that is contrary to the NPSET.	Amend NOSZ-P6 Other activities as follows: <i>Only allow other activities where they:</i> <u><i>x. are regionally significant infrastructure that has an operational need or functional need for its location; or</i></u> <i>1. contribute to the overall health and wellbeing of the community; and</i> <i>[...]</i>
Transpower New Zealand Limited	159.101	OSZ - Open Space Zone	Policies	OSZ-P10 Other activities	Considers the policy fails to recognise the existing location of the National Grid within these zones and because the policies may prevent the National Grid from being located in the Zone in a manner that is contrary to the NPSET.	Amend OSZ-P10 Other activities as follows: <i>Only allow other activities where they:</i> <u><i>x. are regionally significant infrastructure that has an operational need or functional need for its location; or</i></u> <i>1. are compatible with the purpose, character and qualities of the Open Space Zone; and</i> <i>[...]</i>
Transpower New Zealand Limited	159.102	SARZ - Sport and Active Recreation Zone	Policies	SARZ-P8 Other activities	Considers the policy fails to recognise the existing location of the National Grid within these zones and because the policies may prevent the National Grid from being located in the Zone in a manner that is contrary to the NPSET.	Amend SARZ-P8 Other activities as follows: <i>Only allow other activities where they:</i> <u><i>x. are regionally significant infrastructure that has an operational need or functional need for its location; or</i></u> <i>1. contribute to the overall health and wellbeing of the community; and</i> <i>[...]</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Transpower New Zealand Limited	159.103	DEV1 - Broughs Gully Residential Development Area	Objectives	DEV1-O1 Key Outcomes for the Development Area	Considers the PDP should provide the same level of protection for the National Grid as Plan Change 21 to the Operative District Plan. Objective DEV1-O1, as notified, does not achieve this (and does not give effect to Policy 10 and Policy 11 of the NPSET).	Amend DEV1-O1 Key Outcomes for the Development Area as follows: <i>Development occurs in the Broughs Gully Development Area in a comprehensive manner that ensures:</i> [...] 10. stormwater has a minimal effect on Waitarakao (Washdyke lagoon); and 11. there is minimal adverse effects, <u>including reverse sensitivity effects</u> , on the N ational G grid <u>are avoided</u> .
Transpower New Zealand Limited	159.104	DEV1 - Broughs Gully Residential Development Area	Rules	Note:	Supports the clear direction included in the Note that relate to the Development Area that the rules in the district wide chapters apply.	Retain the Rules Note as notified.
Transpower New Zealand Limited	159.105	DEV3 - Washdyke Industrial Development Area	Objectives	DEV3-O1 Key Outcomes for the Development Area	National Grid transmission lines traverse the Development Area and therefore the Submitter seeks that the outcomes for the Development Area reflect the outcomes set out in the Objective of the NPSET. The Submitter considers that DEV3-O1, as notified, does not achieve the objective of the NPSET.	Amend DEV3-O1 Key Outcomes for Development Area as follows: <i>Development occurs in the Washdyke Industrial Development Area in a comprehensive manner that ensures:</i> [...] 10. there is minimal adverse effects, <u>including reverse sensitivity effects</u> , on the N ational G grid <u>are avoided</u> .
Transpower New Zealand Limited	159.106	DEV3 - Washdyke Industrial Development Area	Rules	Note	Considers the note does not direct that the rules in the district wide chapters apply. This would mean that the provisions that protect the National Grid do not apply and therefore the provisions that apply to the Development Area do not give effect to the National Grid.	Amend the Note that accompanies the Rules as follows: <i>Note: The rules of this chapter apply in addition of the underlying zone provisions <u>and district wide chapters</u>. For certain activities, consent may be required by rules in other chapters in the Plan. Unless expressly stated otherwise by a rule, consent is required under each of those rules. The steps plan users should take to determine what rules apply to any activity, and the status of that activity, are provided in Part 1, HPW - How the Plan Works - General Approach.</i>
Transpower New Zealand Limited	159.107	Planning Maps	National Grid Line		Supports the inclusion of the National Grid transmission lines on the Planning Map and notes that the mapping of the lines is a requirement of Policy 12 of the NPSET. The submitter considers that PDP users would be assisted by the clear identification of the voltage of each line so that the definition (and associated provisions) of 'National Grid Yard' and 'National Grid Subdivision Corridor' may be easily understood.	Amend the National Grid line overlay notation for each to include reference to the voltage of that transmission line.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
David & Susanne Payne	160.1	Planning Maps	Rezone		<p>Consider the General Rural Zone is not appropriate for the land north of Geraldine township. Considers a Rural Lifestyle Zone is more appropriate to reflect the existing land use of the area and provide scope and flexibility for the future.</p> <p>Considers the proposed General Rural Zone does not meet the purpose and principles of Part 2 of the RMA and the suggested RLZ will align with the Timaru District Growth Management Strategy.</p> <p>In the Relevant Area, this 'ship has already sailed' and the predominant rural lifestyle and residential densification has already deviated from Policy 5.3.12, as it 'forecloses the ability' for intensive primary production to occur at scale on our property, with reverse sensitivity effects on our long-standing horticultural property already being significant.</p> <p>[see original submission for full reasons]</p>	Rezone the area to the north of Geraldine township, which includes the area encompassed by the Main North Road, Templer Street and Bennett Road including Lot 2 DP 356462 from GRUZ to RLZ .
David & Susanne Payne	160.2	Planning Maps	Future Development Area overlay	FDA11 - Templer Street Future Development Area	<p>Oppose the identification of FDA11, with its associated rules and development timeframe. Considers it is unreasonable to prevent future development for a period of 10 years and depend on the preparation of a development area plan.</p> <p>Considers the area is highly fragmented, is rural lifestyle in character, is serviced and is ready for immediate development so should be rezoned Rural Lifestyle now.</p> <p>[Refer original submission for full reason]</p>	Delete FDA11 from the Future Development Overlay . [[links to the rezone request]]
David & Susanne Payne	160.3	SUB - Subdivision	General	General	<p>Considers PDP and supporting documents are inconsistent and there is confusion regarding on-site wastewater systems within the RLZ. The S.32 report considers a 5000m² minimum allotment size, while the PDP has 2ha if reticulated wastewater is not provided. The submitter considers, the 2ha minimum requirement is overly restrictive and wasteful of the already limited RLZ resource. Considers that 2ha is too large and most RLZ owners are seeking rural amenity values but without too much work to maintain.</p> <p>The requirements do not align with ECan's requirement which is 4ha, which adds another layer of complexity.</p> <p>Support SUB-P15 which states that: 'Require connection to the reticulated wastewater networks where available, or if not available, provide a suitable site area for onsite disposal[...]' [Refer original submission or full reason]</p>	Amend the SUB-Subdivision chapter to: <ol style="list-style-type: none"> 1. Remove the 2ha minimum lot size under SUB-S1.4 for on-site wastewater management system within the RLZ. 2. Create rules to align with SUB-P15 to provide a suitable site area for on-site disposal.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
David & Susanne Payne	160.4	Planning Maps	Versatile Soils Overlay		Oppose the versatile soils overlay on Lot 2 DP 356462 and other land. Considers the Versatile Soil Overlay is at odds with the identification as a Future Development Area. The VS Overlay is not cohesive with the existing land use and is an unnecessary restriction on the land. [Refer original submission or full reason]	Delete Versatile Soil overlay from Lot 2 DP 356462 and the area north of Geraldine township which encompass the Main North Road, Templer Street and Bennett Road.
Fi Glass Products Ltd (Mr Boats)	161.1	SIGN - Signs	Objectives	SIGN-O1 Signs	Supports SIGN-O1(1) as signs contribute to the commercial vitality and character of areas, as well as providing a focal point and adds vibrancy and interest. [Refer original submission for full reason]	Retain SIGN-O1.1 as notified.
Fi Glass Products Ltd (Mr Boats)	161.2	SIGN - Signs	Policies	SIGN-P2 Managing road safety	The Submitter does not support SIGN-P2.3 with the additional description to Digital signs.	Amend Sign-P2 Managing road safety as follows: <i>Require that signs are designed and located so they do not compromise the safe use of any road by motorists, pedestrians and other road users, by:</i> 1 [...] 2 [...] 3. ensuring sign proliferation, illumination levels, light spill, flashing and moving images and digital signs that do not cause distraction; [...]
Fi Glass Products Ltd (Mr Boats)	161.3	SIGN - Signs	Policies	SIGN-P3 Off-site commercial advertising signs	The Submitter opposes SIGN-P3 as it is considered too restrictive to allow for quality installation of third-party signage and because it does not allow businesses and community activities to advertise other than on the specific site it is located.	Not specified.
Fi Glass Products Ltd (Mr Boats)	161.4	SIGN - Signs	Rules	SIGN-R4 Any signs not otherwise address in the Rules section of this chapter	The Submitter opposes SIGN-R4.PER-1 as it specifically excludes all signs which are off-site. Considers that the rule is too prohibitive and any third-party signage would be non-complying automatically.	Amend SIGN-R4.PER-1 for more inclusive rules and apply a more balanced consideration for off-site signage in the CMUZ and GIZ. [No specific rule standards requested]

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fi Glass Products Ltd (Mr Boats)	161.5	SIGN - Signs	Standards	SIGN-S2 Illuminated, moving, flashing and digital signs	<p>1. SIGN-S2.2: Considers a 30-second dwell time of a digital image is too long most other regions have applied standards of 8 seconds based on empirical evidence from existing signs.</p> <p>SIGN-S2.7: Considers that is a level of illumination that is too low for a digital sign at 200cd/m² and 5000cd/m² is more appropriate. This has been applied in other regions such as Auckland Unitary Plan and Christchurch City Council. The Submitter states that the control of daytime illumination through an automated brightness control system is more important that any applied maximum, automated brightness systems moder brightness to be appropriate for mean ambient light conditions at that time.</p> <p>3. SIGN-S2.8: Oppose to this clause as it does not allow digital signs to be located adjoining the State Highway. Submitter states that other regions apply permitted rules and standards and only include Waka Kotahi when permitted standards are breached.</p> <p>[Refer original submission for full reason]</p>	<p>Amend SIGN-S2 Illuminated, moving, flashing and digital signs as follows:</p> <p>1 [...].</p> <p>2. Any illuminated, moving, flashing or digital display sign must only display still images, and where multiple still images are displayed, each still image must be displayed for a minimum of 30 <u>insert a shorter dwell time</u> seconds each before changing to a different still image, and there must be transitions between still images apart from cross-dissolve of a maximum 0.5 seconds.</p> <p>[...]</p> <p>7. Illumination levels of any sign must not exceed 2000 <u>5000</u> candelas per square metre between sunrise and sunset.</p> <p>8. No digital sign is to be located adjoining a State Highway.</p> <p>[No specific changes requested to clause 8]</p>
Fi Glass Products Ltd (Mr Boats)	161.6	SIGN - Signs	Standards	SIGN-S3 Maximum height of signage	Submitter opposes SIGN-S3.2.1 as it applies a 4m height limit for free standing signs, which is considered to be too low for any zone in particular Commercial/Mixed Use Zones, Port and General Industrial Zones where other regions anticipate taller signs.	Not specified.
Fi Glass Products Ltd (Mr Boats)	161.7	SIGN - Signs	Standards	SIGN-S4.2 Maximum area of a sign	Submitter opposes SIGN-S4.2 as 5m ² is considered too small for a sign in the CMUZ and that most free-standing signs would require a resource consent. Submitter states that there is no provision for double sided sign in a 'V' format with other regions assigning a maximum angle of separation.	Not specified.
Fi Glass Products Ltd (Mr Boats)	161.8	SIGN - Signs	Standards	Table 28 - Separation distances	<p>Considers that the separation distances between signs is too prohibitive as it assumes that a property boundary would be greater than 60m.</p> <p>[Refer original submission for full reason]</p>	Not specified.
Fi Glass Products Ltd (Mr Boats)	161.9	SIGN - Signs	General	General	<p>The Section 32 Report fails to provide an adequate planning assessment to support the proposed signage chapter.</p> <p>Do not support the signage chapter or the other provisions relating to signs in the PDP in its current form, and that billboards and digital billboards and non-site related advertising should be explicitly enabled in the provisions and appropriate zones</p>	Not specified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fi Glass Products Ltd (Mr Boats)	161.10	SIGN - Signs	General	General	<p>If off site signage is expressly provided for as requested the submitter considers the proposed plan would achieve the requirements of the RMA, including:</p> <ul style="list-style-type: none"> Achieving the integrated management of the effects of use and development of land and associated natural and physical resources of the districts as required by section 31 of the RMA; Meeting the requirements of section 32 of the RMA, in that the amended policies and rules would be the most appropriate method for achieving the RMA's purpose and are the most efficient and effective means for achieving the District Plan's objectives; Assisting the Council to carry out its statutory functions in order to achieve the purpose of the RMA; and Promoting the sustainable management of natural and physical resources in accordance with Part 2 of the RMA. 	<p>The submitter seeks the following decisions:</p> <ul style="list-style-type: none"> That billboards (including digital billboards and non-site related advertising be explicitly enabled in the plan provisions That billboards (including digital billboards) and non-site related advertising be explicitly enabled in appropriate zones (such as commercial and mixed use, industrial and port zones) through an activity specific permitted activity rule supported by recognised industry standards That the provisions allow for larger signage than is proposed That the provisions allow for more accepted lighting standards as per other regions That the provisions in the plan be amended to address issues raised in this submission Such other relief as may be required to give effect to this submission, including consequential amendments to objectives, policies, rules and definitions of the district plan that address the matters raised by the submitter.
EnviroWaste Services Ltd	162.1	Description of the District	Infrastructure	Regionally Significant Infrastructure	<p>Supports with amendments to ensure the Redruth landfill is included as Regionally Significant Infrastructure as its continuation is essential given the essential nature of the service provide and its importance for waste minimisation and health and safety of the community. Such facilities are affected by reverse sensitivity and are not easily able to be consented, moved or located elsewhere.</p> <p>Also seeks an amendment to include waste facilities described in the wider Infrastructure section of the Introduction.</p>	<p>Amend the description of the District's Infrastructure as follows:</p> <p>Infrastructure</p> <p><i>The district contains the following Regionally Significant Infrastructure:</i></p> <ul style="list-style-type: none"> Strategic land transport network and arterial roads [...] <u>Redruth Landfill and resource recovery facilities.</u> <p>[...]</p> <p><i>There is one public hospital located in the Timaru District which is the only public hospital in South Canterbury that services the wider region. Emergency services such as fire stations and ambulance stations are located in Timaru, Washdyke, Temuka, Pleasant Point, and Geraldine. <u>The Council owns municipal waste minimisation facilities at Redruth Resource Recovery Park which includes a landfill, recycling, composting facilities and also transfer stations in Timaru, Temuka, Geraldine and Pleasant Point.</u></i></p>
EnviroWaste Services Ltd	162.2	Definitions	Definitions	Regionally Significant Infrastructure	<p>Supports with amendments. Amendment sought to ensure the Redruth landfill's is recognised as Regionally Significant Infrastructure given the essential nature of the service provide and its importance for waste minimisation and health and safety of the community. Such facilities are affected by reverse sensitivity and are not easily able to be consented, moved or located elsewhere.</p>	<p>Amend the definition of Regionally Significant Infrastructure as follows:</p> <p><i>Regionally Significant Infrastructure is:</i></p> <p>[...]</p> <p><i>l. Bulk fuel supply infrastructure including terminals, wharf lines and pipelines.</i></p> <p><u><i>m. Redruth Landfill and resource recovery facilities.</i></u></p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
EnviroWaste Services Ltd	162.3	Definitions	Definitions	Hazardous Facility	Considers that waste transfer and disposal facilities should be excluded from the Hazardous Facility definition because sometimes hazardous waste can be found in these facilities but given the minor amount and secure location it should be accommodated for under the definition.	Amend the definition of Hazardous Facility as follows: <i>means a facility or activity that involves the use, storage or disposal of any hazardous substance, but excludes:</i> [...] <i>8. mixing and application of hazardous substances solely for the purpose of controlling plant and animal pests on site.</i> <i>9. <u>waste transfer stations and disposal facilities.</u></i>
EnviroWaste Services Ltd	162.4	Definitions	Definitions	Natural Hazard Mitigation Works	Seeks an amendment to clarify the types of works that Natural Hazard Mitigation Works covers. If the most usual works are listed as an example, then practitioners will be able to understand how the rules apply.	Amend definition of Natural Hazard Mitigation Works as follows: <i>Means structures and associated engineering works to prevent or control the impacts of natural hazards and includes both soft engineering natural hazard mitigation and hard engineering natural hazard mitigation (e.g. stop banks). [...]</i>
EnviroWaste Services Ltd	162.5	SD - Strategic Direction	Objectives	SD-O8 Infrastructure	Seeks an amendment to support the continuance and operational ability of regional infrastructure including the Redruth landfill. If the submitter's relief sought on the regionally significant infrastructure definition is not accepted, then the continuance and expansion of waste recovery and disposal facilities also need to be included in the Strategic Directions chapter and be part of this relevant objective. The submitter considers that amending the definition is preferable to specifically referring to waste facilities in the Strategic Directions chapter.	Amend SD-O8 Infrastructure as follows: <i>Across the District:</i> [...] <i>iv. the benefits of regionally significant infrastructure and lifeline utilities are recognised and their safe, efficient and effective establishment, operation, maintenance, renewal and upgrading and development is enabled while managing adverse effects appropriately <u>and protecting regionally significant infrastructure from reverse sensitivity.</u> Development is serviced by an appropriate level of infrastructure <u>and waste facilities</u> that effectively meets the needs of that development.</i>
EnviroWaste Services Ltd	162.6	UFD - Urban Form and Development	Objectives	UFD-O1 Settlement Patterns	The submitter has a neutral position on this objective but questions what 'these' are with reference to significant adverse effects (in UFD-O1 clause x).	None specified
EnviroWaste Services Ltd	162.7	EI - Energy and Infrastructure	Objectives	General	If the Redruth waste facilities are accepted as regionally significant infrastructure (see the submitters other related submission points), the whole of the Energy and Infrastructure Chapter objectives and policies is supported but particular EI-O4 and the whole chapter, which would help provide for continued operation and upgrading to manage additional waste streams for recovery and recycling.	None specified.
EnviroWaste Services Ltd	162.8	EI - Energy and Infrastructure	Rules	Note	Seeks an amendment to the Rules note to ensure no confusion in the rules that apply to the waste facilities at Redruth and that the objectives and policies apply whereby waste facilities are accepted under the definition of Significant Infrastructure.	Amend the Rules note EI chapter as follows: Rules Note: <i>Activities not listed in the rules of this chapter are classified as a permitted under this chapter.</i> <i><u>The rules in this chapter do not apply to the Redruth Landfill and resource recovery facilities.</u></i> <i>Rules in Sections A - Section F of this chapter take precedence...</i> [...]

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
EnviroWaste Services Ltd	162.9	Plannin g Maps	Precinct	New	Considers that the GIZ does not acknowledge that the specific use of 23 Shaw Street and 55A-55C Redruth Street as a landfill and resource recovery facility, where reverse sensitivity effects may arise from the potential discharge of odour, dust and noise. As a result, request a new precinct be created for this site in GIZ.	1. Add a new Redruth Industrial Precinct area to include the Redruth landfill and resource recovery facility at 23 Shaw Street and 55A-55C Redruth Street. AND 2. Consequential amendment to SCHED16 - Schedule of Precincts and Specific Control Areas Layers. AND 3. Associated changes to the GIZ Chapter as outlined in related submission points.
EnviroWaste Services Ltd	162.10	GIZ - General Industrial Zone	Objectives	New	Considers that a new objective will support changes to activity status for some activities in a proposed precinct for the Redruth landfill site.	Add a new Objective to the GIZ General Industrial Zone Chapter, as follows: <i>PREC0X-O1 Redruth Industrial Precinct</i> <i>Development in the Redruth Industrial Precinct is protected from encroachment of those activities that are sensitive to heavy industrial activity.</i>
EnviroWaste Services Ltd	162.11	GIZ - General Industrial Zone	Policies	New	Considers it is appropriate to add a new policy to support the activities within a proposed new Redruth Precinct. Submitter states that detail to be provided.	Add a new policy to the GIZ General Industrial Zone Chapter to support activities in proposed Redruth Precinct, detail to be provided.
EnviroWaste Services Ltd	162.12	GIZ - General Industrial Zone	Rules	New	Seeks a new rule for the new Redruth Precinct proposed by the submitter. It is proposed that the rule makes trade suppliers, garden centres, storage and lock-up facilities, laboratories, veterinary clinics, service stations, convenience stores, cafes and restaurants as discretionary activities in the proposed Redruth Precinct and industrial activities will remain permitted. Detail to be provided.	Add a new rule for the Redruth Precinct to be provided by the submitter which will: 1. make trade suppliers, garden centres, storage and lock-up facilities, laboratories, veterinary clinics, service stations, convenience stores, cafes and restaurants as discretionary activities; AND 2. Retain Industrial activities as permitted.
EnviroWaste Services Ltd	162.13	GIZ - General Industrial Zone	Policies	GIZ-P5 Offensive trades	The submitter notes that the General Industrial Zone is the only zone available in the District for offensive trades (if a precinct is not provided for the Redruth landfill site, as requested by other submission points). Therefore, the submitter considers that offensive trades should be enabled if they can minimise or contain their effects.	Amend GIZ-P5 as follows: <i>GIZ-P5 Offensive Trades</i> <i>Only Allow offensive trades to establish in the General Industrial Zone where:</i> 1. the activity is located in a manner that will maintain the amenity values of adjacent zones; and 2. the activity and buildings is designed in a way that contains or minimises nuisance effects.
EnviroWaste Services Ltd	162.14	GIZ - General Industrial Zone	Policies	GIZ-P6 Other activities	Supports GIZ-P6, in particular Clause 4 as it provides for industrial activities that cannot establish elsewhere and are sensitive to reverse sensitivity.	Not specified.
EnviroWaste Services Ltd	162.15	GIZ - General Industrial Zone	Rules	GIZ-R3 Convenience stores, restaurants, cafes and take away food outlets	The submitter queries whether the 200 m ² gross floor area in PER-3 is too large. A restaurant or takeaway business of this size has the potential to cause reverse sensitivity effects on existing and proposed industrial activities.	None specified


Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary																
EnviroWaste Services Ltd	162.16	GIZ - General Industrial Zone	Standards	GIZ-S2 Maximum height of buildings and structures	Supports the proposed height as it allows a range of industrial activities to establish and allow buildings to accommodate possible flood events.	Retain as notified.																
EnviroWaste Services Ltd	162.17	GRUZ - General Rural Zone	Rules	GRUZ-R29 New Industrial activities not listed in GRUZ-21	The submitter is concerned that clean fills and landfills will be controlled under GRUZ-R29 as a Non-Complying activity, which do not have a consenting pathway in the GRUZ. The submitter considers that the GRUZ is the most likely zone to accommodate such activities, to allow for residential, commercial, industrial and rural growth, and should have an activity status of Discretionary Activity that must achieve GRUZ-P7. [Refer to original submission for full reason]	None specified.																
EnviroWaste Services Ltd	162.18	TDC - Timaru District Council	TDC - Timaru District Council	TDC-22 Landfill Site identifier	Notes that the proposed designation for the landfill does not include the other resource recovery activities that exist on the site. These include the transfer station, the materials recovery facility (recycling) and organics composting facility. The designation should be altered through the RMA process to include these activities in accordance with the existing resource consent conditions.	Amend TDC-22 Timaru District Council as follows: <table border="1" data-bbox="1789 846 2783 1703"> <tr> <td colspan="2"><i>Timaru District Council</i></td> </tr> <tr> <td><i>Unique identifier and map identifier</i></td> <td><i>TDC-22</i></td> </tr> <tr> <td><i>Purpose of the designation</i></td> <td><i>Landfill, Transfer Station and Recovery Activities</i></td> </tr> <tr> <td><i>Site identifier</i></td> <td><i>Timaru Landfill, Transfer Station and Resource Recovery Activities 23 Shaw Street, Redruth, Timaru</i></td> </tr> <tr> <td><i>Lapse date or Identification that designation has been given effect</i></td> <td><i>Given effect to (no lapse date)</i></td> </tr> <tr> <td><i>Designation hierarchy</i></td> <td><i>Primary</i></td> </tr> <tr> <td><i>Conditions</i></td> <td><i>Yes TDC-22 Conditions</i></td> </tr> <tr> <td><i>Additional information</i></td> <td><i>Former designation 69 Rollover designation with minor corrections to schedule (remove legal description, add location/address and revise conditions to provide for existing resource recovery activities).</i></td> </tr> </table>	<i>Timaru District Council</i>		<i>Unique identifier and map identifier</i>	<i>TDC-22</i>	<i>Purpose of the designation</i>	<i>Landfill, Transfer Station and Recovery Activities</i>	<i>Site identifier</i>	<i>Timaru Landfill, Transfer Station and Resource Recovery Activities 23 Shaw Street, Redruth, Timaru</i>	<i>Lapse date or Identification that designation has been given effect</i>	<i>Given effect to (no lapse date)</i>	<i>Designation hierarchy</i>	<i>Primary</i>	<i>Conditions</i>	<i>Yes TDC-22 Conditions</i>	<i>Additional information</i>	<i>Former designation 69 Rollover designation with minor corrections to schedule (remove legal description, add location/address and revise conditions to provide for existing resource recovery activities).</i>
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Synlait Milk Limited	163.1				Submission point deleted due to duplication, refer to submission point 163.2.	Refer to submission point 163.2.																



Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Synlait Milk Limited	163.2	SD - Strategic Direction	Objectives	SD-O6 Business Areas and Activities	Supports the intent of SD-O6 but considers that it also needs to protect industrial zoned land from reverse sensitivity effects i.e. the purpose and function of industrial areas need to be strategically recognised as important to enabling those business activities. The submitter notes that the Noise Chapter makes reference to reverse sensitivity effects, but there are no other provisions for management of reverse sensitivity effects in relation to other aspects of the Industrial environment eg heavy vehicles, high traffic volumes, lighting, air discharges or visual effect. [see original submission for full reason]	Amend SD-O6 as follows: <i>Business and economic prosperity in the District is enabled in appropriate locations, including by:</i> <ul style="list-style-type: none"> <i>i. providing sufficient land for a range of business activities to cater for projected growth;</i> <i>ii. providing opportunities for a range of business activities to establish and prosper, provided that commercial activities outside of commercial areas are limited so they do not detract from the role and function of the City Centre and Town Centre zones.</i> <i>iii. <u>protecting the purpose and function of Industrial areas.</u></i> OR wording to similar effect.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Synlait Milk Limited	163.3	GIZ - General Industrial Zone	Objectives	General	<p>Concerned that GIZ-O1 to GIZ-O3 as a package fails to convey that a key purpose of the GIZ is to provide a location where the operational needs and efficiency of industrial activities are assured or can be optimised. In this context, the submitter request the objectives of GIZ be amended to address their concerns.</p> <p>[Refer original submission for full reason]</p>	<p>Amend GIZ-O1 as follows:</p> <p>GIZ-O1 The purpose of the General Industrial Zone</p> <p>The A General Industrial Zone where the operational needs and efficiency of provides for a wide range of industrial activities are enabled and other compatible activities that contribute to benefit the economic wellbeing of the district.</p> <p>Or as an alternative to amendments to GIZ-O1, amend GIZ-O2 as follows:</p> <p>GIZ-O2 Operational needs and character-Character and qualities of the General Industrial Zone</p> <p>The <u>operational environment and</u> character and qualities of the General Industrial Zone comprise:</p> <ol style="list-style-type: none"> 1. utilitarian buildings, often with large sites, large yard spaces and external storage; and 2. large volumes of light and heavy vehicle traffic; and 3. activities that may generate a range of adverse effects including significant adverse effects; and 4. activities that may operate 24 hours per day; and 5. good vehicle accessibility from major transport routes and centres; and 6. a safe and functional working environment; and 7. buildings and activities that do not compromise the amenity of adjoining Residential and Open Space and Recreation Zones; and 8. landscape planting and screening along road frontages and Open Space and Recreation Zones. <p>AND</p> <p>Amend GIZ-O3 as follows:</p> <p>GIZ-O3 Use and development in the General Industrial Zone:</p> <ol style="list-style-type: none"> 1. is located so that it can be appropriately serviced by infrastructure; and 2. is not compromised by the establishment of, or inadequate separation from, sensitive activities <u>within and adjoining the General Industrial Zone</u>; and 3. does not compromise the strategic role and function of any of the Commercial and Mixed Use Zones; and 4. maintains the amenity values of adjacent Residential and Open Space and Recreation Zones. <p>OR words with similar effect.</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Synlait Milk Limited	163.4	GIZ - General Industrial Zone	Policies	GIZ-P6 Other activities	Considers GIZ-P6 can be strengthened to provide clearer policy direction in respect of reverse sensitivity, clarifying that other activities, have the potential to undermine the purpose, efficiency or function of the General Industrial Zone. It should clarify that industrial activities are to be protected from reverse sensitivity effects in relation to all aspects of the operating environment within the General Industrial Zone. [Refer original submission or full reason]	Amend GIZ-P6 Other activities as follows: <i>Avoid the establishment of other activities including residential activities unless:</i> [...] 3. <i>the activity does not undermine the purpose, viability and function of any of the Commercial and Mixed Use Zones; and</i> 4. <i>the activity <u>avoids would not result in any</u> reverse sensitivity effects <u>on industrial activities having regard to all elements of the operational environment and does not undermine the purpose, efficiency or function of the General Industrial Zone that may constrain industrial activities.</u></i> OR wording to similar effect.
Synlait Milk Limited	163.5	LIGHT - Light	Objectives	General	Considers LIGHT-O1 and O2 confusing. Seeks to clarify objectives so that one is clearly dealing with the benefits of providing lighting which includes the health and safety of people within a site, while the other specifically deals with the design and management of lighting and its external effects on the character and qualities of the environment, road safety and the wellbeing of people external to the site. [Refer original submission for full reason]	Amend LIGHT-O1 Artificial outdoor lighting to read as follows: <i>Artificial outdoor lighting is designed and located to minimise its adverse effects, <u>is compatible with on</u> the character and qualities of the surrounding <u>environment, area and protects the values and characteristics of</u> light sensitive areas, <u>and the health and safety of people external to the site, including road safety.</u></i> AND Amend LIGHT-O2 Benefits of artificial lighting as follows: <i>The Artificial outdoor lighting benefits <u>and enables a range of outdoor night-time activities, of artificial lighting are recognised while any adverse effects generated do not compromise including the health and safety of people <u>involved in those activities. and communities, including road safety.</u></u></i> OR wording to similar effect.
Synlait Milk Limited	163.6	NOISE - Noise	Objectives	NOISE-O2 Reverse sensitivity	Supports intent of NOISE-O2, but is concerned that the objective is not limited to existing industrial activities, but also the potential future development capacity of land within industrial zones. The word 'constrained' should also be further qualified with reference to the possible loss of development rights, which is a more significant outcome than a hampering or restraint on activities and development which is implied in 'constraint'.	Amend NOISE-O2 Reverse Sensitivity to read as follows <i>The Airport, Raceway, State Highway, railway lines, and the Port and activities <u>and development potential located</u> within commercial, mixed use and industrial zones are not constrained <u>or lost as a consequence of by</u> reverse sensitivity effects arising from noise sensitive activities.</i> OR wording to similar effect.
Synlait Milk Limited	163.7	NOISE - Noise	Policies	NOISE-P5 Reverse sensitivity	Supports NOISE-P5 for any noise sensitive activities which do get approval to locate in the General Industrial Zone to provide acoustic mitigation.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Zolve Environmental	164.1	General	General	General	Support Port Blakely Forestry submission in its entirety.	Relief sought as per Port Blakely Forestry submission.
Zolve Environmental	164.2	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R4 Clearance of trees in the Long-Tailed Bat Protection Area	Considers that the current requirements for an ecological assessment do not align with the current Department of Conservation Protocols and processes.	Amend ECO-R4 Clearance of trees in the Long-Tailed Protection Area as follows: [...] Activity status where compliance not achieved: Restricted discretionary Matters of discretion are restricted to: <ol style="list-style-type: none"> whether, upon specialist assessment by a suitably qualified ecologist <u>person as deemed competent by the Department of Conservation</u>, the tree/s proposed to be removed is habitat for long-tailed bats; and [...]
Zolve Environmental	164.3	Planning Maps	Bat Protection Area Overlay		Considers that the current Long-tailed Bat overlay does not include some newly found colonies or allow for the discovery of new colonies and the provisions needed to protect Pekapeka at their most vulnerable maternal roosting period.	<ol style="list-style-type: none"> Extend the Bat Protection Area overlay to include all known colonies and surrounding areas. AND <ol style="list-style-type: none"> Include a more extensive buffer on the Bat Protection Area to trigger ECO-R4 rules during maternal roosting timeframes.
Zolve Environmental	164.4	NATC - Natural Character	Rules	NATC-R4 Construction of fences	Considers the rule, permitting only post and wire fencing does not allow for predator fencing for conservation purposes. Considering these areas are more significant to the district regarding biodiversity values, seems possible this is where conservation projects requiring predator fencing may be applied.	Amend NATC-R4 Construction of fences as follows: Riparian margins of a river that is not an HNWB Activity status: Permitted Where: PER-1 <i>The fence is a post and wire fence only; <u>or</u></i> PER-2 <i>Fencing requirements for conservation purposes</i>
Zolve Environmental	164.5	NFL - Natural Features and Landscapes	Rules	NFL-R4 Construction of fences, including earthworks	Considers restricting fencing to post and wire (as permitted activities) does not allow for predator fencing for conservation purposes. Considering these areas are more significant to the district regarding biodiversity values, seems possible this is where conservation projects requiring predator fencing may be applied.	Amend NFL-R4 to: <ol style="list-style-type: none"> include a rule 'or fencing requirements for conservation purposes'; and Also allow indigenous vegetation clearance if it is for the purpose of conservation outcomes such as erecting a predator fence.

Submitter	Sub No.	Section/Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Zolve Environmental	164.6	General	General		Although the significant values and areas have been identified, we feel the areas without active support and management are potentially still declining; there is high potential for the council and other stakeholders to develop strategic direction across the district to align conservation projects, utilising the limited remaining and fragmented natural landscapes and achieve significant biodiversity outcomes. However, without support for landowners and communities who are providing ecosystem services, this opportunity could be lost.	Overall, we support the proposed district plan regarding the conservation and biodiversity directions however request that strategic planning and an extensive stakeholder engagement approach be adopted.
Fonterra Limited	165.1	General	Special Purpose Zone	New	The submitter is concerned that the proposed General Industry Zone (GIZ) is a poor fit for their site, in particular the zone policy framework does not account for the special characteristics of the Clandeboye site.	Amend the PDP to add a new Strategic Rural Industry Zone , including necessary changes to the Planning Maps and a new Chapter including a new Introduction, Objectives, Policies, rules and Standards as outlined in Attachment B of the original submission.
					<p>The submitter outlines the nature of their operation and how the PDP provisions are not suitable for the needs of the site or Council/Community.</p> <p>Considers that there is significant benefit to Council, the community and their operations, to provide for the Clandeboye site in a “specific” new zone, being the SPZ-SRI. It is anticipated that this new zone will have wider application than the Clandeboye site, although it is the responsibility of individual sites to pursue the zoning and demonstrate the need or benefit of the zone to their site and operations.</p> <p>[see original submission for full detail]</p>	
Fonterra Limited	165.2	Planning Maps	Rezone		<p>Submitter opposes the General Industry Zoning and General Rural Zoning on their Clandeboye site. The submitter is proposing a new Special Purpose Zone - Strategic Rural Industry Zone for Clandeboye site.</p> <p>[see original submission for full detail]</p>	<p>Amend the zoning of the land at Clandeboye on attached map, to a Special Purpose Zone - Strategic Rural Industry Zone;</p> <p>OR</p> <p>If the preferred relief is not accepted then:</p> <p>Extend the GIZ to include all of the land shown on attached map.</p> <p>Alternative relief may be considered by submitter through this process.</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
						
Fonterra Limited	165.3	Plannin g Maps	General Industrial Zone		Supports the General Industry zoning of 110 Donahue Road	Retain the General Industrial zoning of 110 Donahue Road.
Fonterra Limited	165.4	Plannin g Maps	Specific Control Area	Height Specific Control Area	Subject to consideration of the new SPZ-SRI, opposes the proposed Height Specific Control Area overlay on their Cladeboye manufacturing site.	Delete the Height Specific Control Area off the Fonterra Cladeboye site, this will be replaced the proposed Special Purpose Zone - Strategic Rural Industry Zone (as sought by the submitter).
Fonterra Limited	165.5	Plannin g Maps	Noise Control Boundary Overlay	New	The submitter requests a new Noise Control Boundary to allow effective management of noise sensitive activities in close proximity to the Cladeboye site. [see original submission for full detail]	Amend the PDP to insert new Fonterra Cladeboye Noise Control Boundary Overlay onto the planning maps. The extent of the proposed NCB is shown on the attached map. 

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fonterra Limited	165.6	Planning Maps	Regional Arterial route		Given the role of Kotuku Place, submitter considers that the Regional Arterial status of Kotuku Place should be removed and the Regional Arterial route instead continued on Canal Road to the intersection of Canal Road / Rolleston Road / Milford Clandeboye Road.	1. Delete the Regional Arterial status shown on Kotuku Place; AND 2. Instead, extend the Regional Arterial status along Canal Road to the intersection of Canal Road / Rolleston Road / Milford Clandeboye Road.
Fonterra Limited	165.7	Planning Maps	Port Zone	Height Specific Control Area	As the PORTZ Height Specific Control Area overlay has no associated rules, submitter considers that the control overlay can be deleted.	Delete the Port Zone Height Specific Control Area Overlay from the Planning Maps.
Fonterra Limited	165.8	Planning Maps	General Industrial Zone		Considers the proposed zoning of specific sites in Temuka is appropriate.	Retain the General Industrial zoning of 2, 2a and 6 King Street, Temuka.
Fonterra Limited	165.9	Foreword or Mihi	Foreword or mihi	General	The submitter notes the District Plan is not intended to manage activities 'so they do not affect the environment'. The District Plan should manage adverse effects on the environment.	Amend the Foreword or Mihi as follows: <i>'...It provides a framework that enables expected activities and manages <u>the potential adverse effects of</u> other activities <u>so they do not affect on</u> the environment.</i>
Fonterra Limited	165.10	Description of the District	Settlement Patterns, Growth and Development	General	Supports recognition of the adverse effects (by way of reverse sensitivity effects) that rural lifestyle development has on the rural environment.	Retain as notified.
Fonterra Limited	165.11	Description of the District	Business Zones and Centres	General	Supports recognition of the Clandeboye site in the description of the District's commercial areas.	Retain as notified.
Fonterra Limited	165.12	Description of the District	Rural Areas	General	Considers that strategic rural industry should be highlighted in this section of the Plan. Also, as drafted the Plan suggests that a 'balance' is required between rural lifestyle and rural activities. Submitter does not support this and seeks amendments.	Amend the description of Rural Areas as follows: <i>Rural areas are dominated by agricultural land use, with some areas of horticulture and viticulture. Farming is largely pastoral, with sheep and beef farms dominating in the steeper or higher altitude areas and dairy farms occupying much of the plains, particularly at Rangitata Island. <u>Rural industry, including strategic rural industry, has a functional and operational need to locate in rural areas to support primary production activities.</u></i> <i>[...]</i> <i>New residential land uses may be <u>incompatible with impacted by</u> existing farming activities <u>and rural industry</u> occurring in the working rural environment. <u>Rural lifestyle development should be restricted</u> A balance is needed between these activities to maintain the ability of farming activities and rural industry to continue in a rural environment.</i> <i>Furthermore, the district contains a large proportion of high class productive, or versatile, soils. These are the soils classified as Class 1, to 2 and 3 under the Land Use Capability (LUC) classification system and are highly productive for a range of primary <u>production activities industries</u> [...]</i>
Fonterra Limited	165.13	Definitions	Definitions	Hazardous facility	Submitter does not consider that there is any need for this definition to exist, as the provisions relating to 'hazardous facilities' should be deleted.	Delete the definition of Hazardous Facility (in response to amendments recommended to the chapter).

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fonterra Limited	165.14	Definitions	Definitions	Height	Considers the definition should provide for appropriate exemptions.	Amend the definition of Height as follows: <i>means the vertical distance between a specified reference point and the highest part of any feature, structure or building above that point.</i> <i><u>For the purposes of this definition, the measurement of height shall not include lift towers, stairwells, skylights, antennae, or plant rooms, chimneys, flues, flagpoles, aerials or other such projections which;</u></i> <i><u>a. do not exceed the maximum permitted height by more than 15% of the height limit for the zone,</u></i> <i><u>b. or 2.5m, whichever is the lesser; and</u></i> <i><u>c. do not exceed more than 10% of the area of the footprint of the building, or 50m², whichever is the lesser.</u></i>
Fonterra Limited	165.15	Definitions	Definitions	Light Sensitive Area	Considers it is inappropriate that the Rural Lifestyle Zone is protected by this definition. As a rural zone, it should not be protected from typical rural effects, including light.	Amend the definition of Light Sensitive Area as follows: <i>Includes land in the following areas outside of the Port Zone:</i> <i>a. Wāhi tapu, Wāhi taoka and Wai taoka Overlays</i> <i>b. Significant Natural Areas Overlay</i> <i>c. Outstanding Natural Landscapes Overlay</i> <i>d. Visual Amenity Landscape Overlay; <u>and</u></i> <i><u>e. the Rural Lifestyle Zone; and</u></i> <i><u>ef. the Natural Open Space Zone.</u></i>
Fonterra Limited	165.16	Definitions	Definitions	Noise sensitive activity	Community facilities are also sensitive to noise and likely to give rise to reverse sensitivity effects. Submitter would also be agreeable to the term 'place of assembly' instead of 'community facility' as it is acknowledged that this is already a term defined in the PDP.	Amend definition of Noise sensitive activity as follows: <i>Noise sensitive activity means:</i> <i>[...]</i> <i>d. Healthcare activities; <u>and</u></i> <i>e. Marae (building only); <u>and</u></i> <i><u>f. Community facility.</u></i>
Fonterra Limited	165.17	Definitions	Definitions	Regionally Significant Infrastructure	Regionally Significant Infrastructure: Supports the inclusion of the Port in the definition.	Retain the Port Zone in the Regionally Significant Infrastructure definition.
Fonterra Limited	165.18	Definitions	Definitions	Reverse sensitivity	Reverse sensitivity: Supports the definition of reverse sensitivity proposed.	Retain as notified.
Fonterra Limited	165.19	Definitions	Definitions	Rural industry	Rural industry: Fonterra supports the definition of rural industry proposed.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fonterra Limited	165.20	Definitions	Definitions	Rural residential development	Opposes the definition of rural residential development. The National Planning Standards provide for a Rural Lifestyle Zone (as does the PDP) and considers that the District Plan wording regarding this category of development should be consistent. As such, all references to rural residential should be amended to rural lifestyle.	Amend the definition of Rural Residential Development as follows: Rural residential lifestyle development: [...]
Fonterra Limited	165.21	Definitions	Definitions	Sensitive activity	Opposes the exception in (b), particularly that 'place of assembly' is not considered sensitive in relation to noise. Places of assembly (including community facilities) are sensitive to noise and likely to give rise to reverse sensitivity effects. It is also noted that the numbering is confusing and needs amending	Amend the definition of Sensitive Activity as follows: <i>Sensitive activity means:</i> 1. Residential activities; 2. Education facilities and preschools; 3. Guest & visitor accommodation; 4. Health care facilities which include accommodation for overnight care; 5. Hospitals; 6. Marae (building only); or 7. Place of assembly. <i>except that:</i> <i>a. subclause f-6 and 7 above is not applicable in relation to electronic transmission.</i> <i>b. subclause g. above is not applicable in relation to noise or electronic transmission.</i>
Fonterra Limited	165.22	Definitions	Definitions	New	Considers the PDP should include a definition of strategic rural industry activities.	Add a new definition to the PDP as follows: <u>Strategic rural industry activities means: any activity that is associated with the processing, testing, storage, handling, packaging or distribution of products manufactured at sites in the Special Purpose Zone - Strategic Rural Industry.</u>
Fonterra Limited	165.23	Definitions	Definitions	Wastewater	Supports the definition of wastewater.	Retain as notified.
Fonterra Limited	165.24	National Policy Statements and New Zealand Coastal Policy Statement	General	General	This section should refer to the most recent versions of National Policy Statements. Also, the Plan should be reviewed against the National Policy Statement for Highly Productive Land 2022.	Amend this section as follows: [...] <i>National Policy Statement on Urban Development Capacity 2016 2020</i> [...] <u>National Policy Statement on Highly Productive Land 2022</u>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fonterra Limited	165.25	SD - Strategic Direction	Objectives	SD-O1 Residential Areas and Activities	Submitter generally supports SD-O1 but consider that it is appropriate to recognise reverse sensitivity effects when providing for further rural lifestyle development.	Amend SD-O1 Residential Areas and Activities as follows: [...] <i>ii. limited rural lifestyle development opportunities are provided where they concentrate and are attached to existing urban areas, achieve a coordinated pattern of development, <u>avoid reverse sensitivity effects on existing and permitted rural activities</u> and are capable of efficiently connecting to reticulated sewer and water infrastructure; and</i> [...]
Fonterra Limited	165.26	SD - Strategic Direction	Objectives	SD-O2 The Natural and Historic Environment	Submitter generally supports SD-O2 but considers that reference to 'significant heritage' in point vii is vague and should be amended.	Amend SD-O2 The Natural and Historic Environment as follows: [...] <i>the important contribution of historic heritage to the District's character and identity is recognised, and <u>significant historic heritage</u> and its values are protected from inappropriate subdivision, use, and development.</i>
Fonterra Limited	165.27	SD - Strategic Direction	Objectives	SD-O3 Climate Change	Agrees that the effects of climate change need to be recognised and managed.	Retain as notified.
Fonterra Limited	165.28	SD - Strategic Direction	Objectives	SD-O4 Natural Hazards	Agrees that the effects of natural hazards need to be recognised and managed.	Retain as notified.
Fonterra Limited	165.29	SD - Strategic Direction	Objectives	SD-O5 Mana Whenua	Submitter agrees that the needs of Kāti Huirapa should be provided for within the district. Given the rural location of the Māori Purpose Zones care should be taken to ensure that papakāinga are not located where there may be impacts on human health due to existing or permitted rural, and rural industrial, activities.	Amend SD-O5 Mana Whenua as follows: [...] <i>v. Māori reserve lands are able to be used by Kāti Huirapa for their intended purposes <u>in a manner that maintains the health and safety of their people</u>;</i>
Fonterra Limited	165.30	SD - Strategic Direction	Objectives	SD-O6 Business Areas and Activities	Considers that the wording of this provision should be amended to provide for existing and new businesses.	Amend SD-O6 Business Areas and Activities as follows: <i>Business and economic prosperity in the District is enabled in appropriate locations, including by:</i> <i>i. providing sufficient <u>and appropriately located</u> land for <u>to meet the operational requirements of a range of existing and new</u> business activities and to cater for projected growth;</i> <i>ii. providing opportunities for a range of business activities to establish and prosper, provided that commercial activities outside of commercial areas are limited so they do not detract from the role and function of the City Centre and Town Centre zones; <u>and</u></i> <i>iii. <u>protecting industrial land from inappropriate activities establishing within the zone and protecting the zone interface to avoid reverse sensitivity effects.</u></i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fonterra Limited	165.31	SD - Strategic Direction	Objectives	SD-O8 Infrastructure	Considers that the wording of this provision should be amended to provide for existing and new businesses.	Amend SD-O8 Infrastructure as follows: [...] <i>ii. the provision of new network infrastructure is integrated and co-ordinated with the nature, timing and sequencing of <u>both</u> new development <u>and the growth of existing development</u>;</i> [...]
Fonterra Limited	165.32	SD - Strategic Direction	Objectives	SD-O9 Rural Areas	Considers that the wording of this strategic direction should be amended to better protect rural areas for their intended purposes.	Amend SD-O9 Rural Areas the strategic direction as follows: <i>A range of primarily productive <u>Primary production</u> activities are enabled in the rural environment to enable the ongoing use of land for primary production for present and future generations, while:</i> <i>i. protecting versatile soils for productive uses;</i> <i>ii. managing the adverse effects of intensive activities on sensitive activities;</i> <i>iii. managing the adverse effects of new sensitive activities on primary production <u>and rural industry</u>;</i> <i>iv. avoiding activities that have no functional/ or operational need to locate in the rural area;</i> <i>v. identifying and maintaining the character, qualities and amenity values of rural areas;</i> <i>vi. ensuring Future Development Area <u>provide for rural activities until rezoned for residential purposes</u>. <u>Overlay remains available for future urban or rural lifestyle development.</u></i>
Fonterra Limited	165.33	UFD - Urban Form and Development	Objectives	UFD-O1 Settlement Patterns	Considers that reference to reverse sensitivity effects ensures that the impact of sensitive activities on business is recognised (not just the effects of business, typically industry, on sensitive activities).	Amend UFD-O1 Settlement Patterns as follows: [...] <i>x. controls the location of activities, primarily by zoning, to minimise <u>reverse sensitivity effects and conflicts between incompatible activities and avoid these where there may be significant adverse effects.</u></i>
Fonterra Limited	165.34	EI - Energy and Infrastructure	Objectives	EI-O1 Regionally Significant Infrastructure	It is appropriate that regionally significant infrastructure contributes to the economy, enables people and communities and aligns with development.	Retain as notified.
Fonterra Limited	165.35	EI - Energy and Infrastructure	Policies	EI-P1 Recognising the benefits of Regionally Significant Infrastructure and Lifeline Utilities	It is appropriate that regionally significant infrastructure contributes to the economy, enables people and communities and aligns with development.	Retain as notified.
Fonterra Limited	165.36	SW - Stormwater Management	Introduction	General	Considers that appropriate recognition is included in the Introduction to exclude activities that hold regional consent for the discharge of stormwater.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fonterra Limited	165.37	SW - Stormwater Management	Section B: Activities in the General Industrial Zone, Port Zone and Open Space and Recreation zones	SW-R4 All developments, other than a road, that result in an increase in impervious surfaces of greater than 30m ² , excluding stormwater discharges that are authorised by a resource consent from the Canterbury Regional Council pursuant to the relevant regional plan	Supports the recognition that the rule does not apply to those activities that hold regional consent(s) relating to stormwater. However, a consequential amendment is required to account for the new SPZ-SRI proposed by Fonterra	Amend SW-R4 All developments, other than a road ... as follows: <i>Section B: Activities in the General Industrial Zone, <u>Strategic Rural Industry Zone</u>, Port Zone and Open Space and Recreation zones</i> Add ' <i>Strategic Rural Industry Zone</i> ' to the left column.
Fonterra Limited	165.38	TRAN - Transport	Objectives	TRAN-O1 Safe, efficient, integrated and sustainable land transport infrastructure	It is appropriate that transport infrastructure aligns with growth and encourages sustainable economic development.	Retain as notified.
Fonterra Limited	165.39	TRAN - Transport	Policies	TRAN-P7 High traffic generating activities	Submitter agrees that alternative transport modes should be encouraged (rather than mandated) as this recognises that not all high traffic generators are appropriate for alternative transport modes.	Retain as notified.
Fonterra Limited	165.40	TRAN - Transport	Policies	TRAN-P8 Parking, loading and manoeuvring	Submitter does not support the requirement for landscaping of all parking areas. The policy should recognise that landscaping should be provided, where appropriate and relative to the zoning of the land.	Amend TRAN-P8 Parking, loading and manoeuvring as follows: <i>Require land use activities to provide:</i> [...] 4. <i>where appropriate</i> , landscaping in provided parking areas that visually softens the dominant effect of hard surfaces and positively contributes to amenity values <u>anticipated for the zone</u> .
Fonterra Limited	165.41	TRAN - Transport	Standards	TRAN-S1 Landscaping where five or more at grade car parking spaces are provided for non- Residential activities on a site	Considers that on a site as large and visually complex as those in the SRIZ, it is unreasonable to expect amenity landscaping along a road boundary, where the new additional car parking is not visible from the road.	Amend TRAN-S1 Landscaping as follows: TRAN-S1 All Zones (<u>excluding the Strategic Rural Industry Zone</u>)

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fonterra Limited	165.42	TRAN - Transport	Standards	TRAN-S5 Cycle parking provision	Considers that it is unnecessary to provide for cycle parking in the SRIZ given their isolated locations. In the event that cycle parking is provided, it will meet the requirements of TRAN-S6	Amend TRAN-S5 Cycle parking provision as follows: TRAN-S5 All Zones (<u>excluding the Strategic Rural Industry Zone</u>)
Fonterra Limited	165.43	TRAN - Transport	Standards	TRAN-S7 Minimum loading space requirements	It is not necessary to make specific provision for loading on a site like those in the SRIZ, as suitable loading is inherent to the site's layout and operational requirements. When loading is provided it will comply with the requirements of TRAN-S8.	Amend TRAN-S7 Minimum loading space requirements as follows: TRAN-S7 All Zones (<u>excluding the Strategic Rural Industry Zone</u>)
Fonterra Limited	165.44	TRAN - Transport	Standards	TRAN-S20 High Trip Generating Activities	Traffic generation for development in the SRIZ will be controlled by a new provision for that zone.	Amend TRAN-S20 High Trip Generating Activities as follows: TRAN-S20 All Zones (<u>excluding the Strategic Rural Industry Zone</u>)
Fonterra Limited	165.45	NH - Natural Hazards	Objectives	NH-O1 Areas subject to natural hazards	Considers that the objective should be amended to enable risks to be managed outside of a high-risk area (noting that 'manage' includes 'avoid, remedy or mitigate').	Amend NH-O1 Areas subject to natural hazards as follows: <i>Risk to human life and significant risk to property, from natural hazards is:</i> <i>1. avoided in high hazard areas; and</i> <i>2. avoided or mitigated <u>managed</u> elsewhere to an acceptable level.</i>
Fonterra Limited	165.46	NH - Natural Hazards	Policies	NH-P1 Identification of natural hazards and approach to management within Natural Hazard Areas	Considers a risk-based approach is appropriate (but requests amendments to the rules to appropriately reflect this)	Retain as notified.
Fonterra Limited	165.47	NH - Natural Hazards	Policies	NH-P4 Subdivision, use and development in Flood Assessment Areas, excluding high hazard areas and overland flow paths	Considers it is appropriate to enable use, development and subdivision in a 0.5% AEP flood area where risks are managed.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fonterra Limited	165.48	NH - Natural Hazards	Rules	NH-R1 Earthworks, excluding land disturbance and for natural hazard mitigation works	Supports the risk based approach to this rule, where less risky activities are provided for as permitted activities.	Retain as notified.
Fonterra Limited	165.49	NH - Natural Hazards	Rules	NH-R4 Natural hazard sensitive activities or structures and additions to such activities or structures with a ground floor area of 30m ² or more	Supports the risk-based approach to this rule, where less risky activities are provided for as permitted activities.	Retain as notified.
Fonterra Limited	165.50	NH - Natural Hazards	Rules	NH-R7 Natural Hazard Sensitive Activities and additions, new buildings, and structures with a ground floor area of less than 30m ² (excluding Regionally Significant Infrastructure)	Given that the rule title provides for buildings and structures less than 30m ² , the addition of PER-2 seems contradictory.	Amend NH-R7 Natural Hazard Sensitive Activities ... as follows: Activity status: Permitted Where PER-1 <i>The building or structure or addition is below ground; or</i> PER-2 <i>The new building or structure or addition has a ground floor area of less than 10m²; or</i> PER-3 <i>The new building or structure or addition is located within a road corridor; or</i> PER-3 <i>A Flood Risk Certificate for the site has been issued in accordance with NH-S1 and the certificate states that the activity is not located on land that is within an overland flow path.</i>
Fonterra Limited	165.51	NH - Natural Hazards	Rules	NH-R8 Subdivision	Considers that the activity status for the Liquefaction Awareness Areas should be amended to controlled. Understands that this rule only applies to subdivision within a Liquefaction Awareness Area and is concerned to ensure the rule remains limited to that extent.	Amend NH-R8 Subdivision as follows: [...] 2 Liquefaction Awareness Areas Overlay Activity status: Restricted Discretionary Controlled Matters of discretion control are restricted to: [...]
Fonterra Limited	165.52	NH - Natural Hazards	Standards	NH-S2 Volume of earthworks	Given the isolated nature of the Clandeboye site and the extent of the surrounding flood plain, it is unclear what the PDP is seeking to manage with the 2000m ² threshold.	Amend NH-S2 Volume of earthworks as follows: NH-S2

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
						Flood Assessment Areas Overlay (<u>excluding the Strategic Rural Industry Zone</u>)
Fonterra Limited	165.53	HS - Hazardous Substances	Introduction	General	Opposes the purpose of this chapter to manage 'hazardous facilities'. The use, storage, disposal and transportation of hazardous substances is controlled by other legislation, including in areas subject to natural hazards.	<p>Amend the Introduction to the HS - Hazardous Substances Chapter as follows:</p> <p>[...]</p> <p>Accordingly, the District Plan addresses the following resource management matters concerning hazardous substances:</p> <ol style="list-style-type: none"> 1. potential adverse effects on sensitive activities and sensitive environments; 2. reverse sensitivity effects caused by sensitive activities locating too close to major hazardous facilities; 3. the risks to hazardous facilities from natural hazards and consequential risks to the environment; 4. 3. cumulative effects of major hazard facilities locating too close each other. <p>The adverse effects associated with these resource management issues generally have a low probability of occurring but a high potential impact if they do occur. As such and as the need to comply with the HSNO and HSW Acts significantly reduces most risks associated with hazardous substances, this chapter focuses on higher risk facilities, being hazardous facilities and major hazard facilities. Major Hazard Facilities are identified through the Health and Safety at Work (Major Hazard Facilities) Regulations 2016.</p> <p>Proposals for new Major Hazard Facilities (and additions to Major Hazard Facilities), will require a Quantitative Risk Assessment to be provided which is prepared by a suitably qualified person. This assessment will help quantify the extent and nature of the risk. Unacceptable risks to human health are defined as an individual human fatality not greater than 1 x 10⁻⁶ per year (one in a million). Where a Quantitative Risk Assessment has been prepared, sensitive activities are required to located outside of the (1 x 10⁻⁶ per year) risk area, or if no such assessment exists, at least 250m away from the Major Hazard Facilities.</p>
Fonterra Limited	165.54	HS - Hazardous Substances	Objectives	HS-O1 Hazardous substances, use, storage and disposal	The use, storage, disposal and transportation of hazardous substances is controlled by other legislation. If the intention of the objective is to manage Major Hazard Facilities, the objective should be appropriately worded to reflect this.	Delete HS-O1 Hazardous substances, use, storage and disposal .
Fonterra Limited	165.55	HS - Hazardous Substances	Policies	HS-P4 Hazardous facilities (other than Major Hazard Facilities)	The use, storage, disposal and transportation of hazardous substances is controlled by other legislation.	Delete HS-P4 Hazardous facilities (other than Major Hazard Facilities) .

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fonterra Limited	165.56	HS - Hazardous Substances	Rules	HS-R1 Use and/or storage of hazardous substances in a hazardous facility (excluding Major Hazard Facilities)	The use, storage, disposal and transportation of hazardous substances is controlled by other legislation	Delete HS-R1 Use and/or storage substances.
Fonterra Limited	165.57	HH - Historic Heritage	Objectives	HH-O3 Active use of Historic Heritage Items	Supports the proposed wording of this objective.	Retain as notified.
Fonterra Limited	165.58	HH - Historic Heritage	Policies	HH-P3 Benefits of active protection and use of Historic Heritage Items	Supports the proposed wording of this policy.	Retain as notified.
Fonterra Limited	165.59	HH - Historic Heritage	Policies	HH-P4 Maintenance, repairs and internal alterations to Historic Heritage Items	Consider that the policy should be amended to provide for the management of effects.	Amend HH-P4 Maintenance, repairs and internal alterations to Historic Heritage Items as follows: <i>Enable the maintenance and repair of Historic Heritage Items and internal alterations where that do not <u>adversely affect</u> <u>the heritage values of any scheduled interior elements are managed.</u></i>
Fonterra Limited	165.60	HH - Historic Heritage	Policies	HH-P5 Signs and external alterations and additions to Historic Heritage Items	Submitter generally supports the proposed wording of this policy but considers that the word 'only' should be deleted.	Amend HH-P5 Signs and external alterations and additions to Historic Heritage Items as follows: <i>Only a Allow external alterations and additions to Historic Heritage Items, signs attached to Historic Heritage Items, or internal alterations which affect scheduled interior elements where: [...]</i>
Fonterra Limited	165.61	HH - Historic Heritage	Policies	HH-P6 Relocation of Historic Heritage Items within or beyond their heritage setting	Submitter generally supports the proposed wording of this policy but considers that the word 'only' should be deleted.	Amend HH-P6 as follows: HH-P6 Relocation of Historic Heritage Items within or beyond their heritage setting <i>Only a Allow the relocation of Historic Heritage Items within or beyond their heritage setting where it can be demonstrated that: [...]</i>
Fonterra Limited	165.62	HH - Historic Heritage	Policies	HH-P7 Management of heritage settings	Submitter generally supports the proposed wording of this policy but considers that the word 'only' should be deleted	Amend HH-P7 Management of heritage settings as follows: <i>Only a Allow subdivision, earthworks or new buildings within the settings of Historic Heritage Items where they protect the heritage values of the items, taking into account whether: [...]</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fonterra Limited	165.63	HH - Historic Heritage	Policies	HH-P8 Demolition of Category B Historic Heritage Items	Opposes this policy and considers that it is important that reference is also made to the values of the heritage item and the effect of the loss of these.	Amend HH-P8 Demolition of Category B Historic Heritage Items as follows: Only a <i>Allow demolition of a Category B Historic Heritage Item identified in SCHED3 - Schedule of Historic Heritage Items where it can be demonstrated that:</i> [...] <i>5. the heritage values identified for the item are already degraded or lost.</i>
Fonterra Limited	165.64	HH - Historic Heritage	Rules	HH-R1 Maintenance, repair or internal alterations of a Historic Heritage Item	Supports the proposed wording of this rule as it is appropriate to provide for maintenance, repair and internal alterations.	Retain as notified.
Fonterra Limited	165.65	HH - Historic Heritage	Rules	HH-R2 Temporary buildings and structures within a heritage setting	Supports the proposed wording of this rule as it is appropriate to provide for temporary activities in a heritage setting	Retain as notified.
Fonterra Limited	165.66	HH - Historic Heritage	Rules	New	Submitter considers that a new controlled activity rule should be included to provide for new buildings, structures and signs within a Category B heritage setting.	Insert a new rule into the HH-Historic Heritage Chapter as follows: <i>New buildings, structures and signs (other than official signs) within a Category B heritage setting</i> <i>Activity status: Controlled</i> <i>Matters of control are restricted to:</i> <i><u>1. compatibility of the form, scale, design and materials of the new building, structure or sign with the historic heritage item, its identified values and its setting; and</u></i> <i><u>2. location of the new building, structure or sign with particular regard to whether it obstructs sightlines that are critical to an appreciation of the heritage values of the item(s); and visibility from public spaces; and</u></i> <i><u>3. relationship with other elements with the heritage setting including ancillary structures, plantings and access.</u></i>
Fonterra Limited	165.67	HH - Historic Heritage	Rules	HH-R3 New buildings, structures and signs within a heritage setting	Considers that this rule should be amended to only apply to Category A heritage items.	Amend HH-R3 New buildings, structures and signs as follows: <i>New buildings, structures and signs (other than official signs) within a Category A heritage setting</i> [...]

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fonterra Limited	165.68	HH - Historic Heritage	Rules	New	Consider that a new controlled activity rule should be included to provide for earthworks in a Category B heritage setting.	<p>Insert a new rule into the HH-Historic Heritage Chapter as follows:</p> <p><u>Earthworks within a Category B heritage setting</u></p> <p><u>Activity status: Controlled</u></p> <p><u>Matters of control are restricted to:</u></p> <p><u>1. the values of the heritage item and the impacts of the earthworks on those values and</u></p> <p><u>2. the scale, nature, extent and timing of the earthworks;</u></p> <p><u>3. any measures proposed to mitigate adverse effects associated with the earthworks on the heritage item;</u></p> <p><u>4. the commitment to implementation of an Accidental Discovery Protocol, in accordance with a commitment form contained within APP4 - Form confirming a commitment to adhering to an Accidental Discovery Protocol.</u></p>
Fonterra Limited	165.69	HH - Historic Heritage	Rules	HH-R4 Earthworks within heritage settings	Considers that this rule should be amended to only apply to Category A heritage items.	<p>Amend HH-R4 as follows:</p> <p>Earthworks within <u>a Category A</u> heritage setting</p> <p>[...]</p>
Fonterra Limited	165.70	HH - Historic Heritage	Rules	New	Considers that a new controlled activity rule should be included to provide for external strengthening of a Category B heritage item	<p>Insert a new rule into the HH-Historic Heritage Chapter as follows:</p> <p><u>External strengthening of a Category B Historic Heritage Item</u></p> <p><u>Activity status: Controlled</u></p> <p><u>Matters of control are restricted to:</u></p> <p><u>1. methodologies, design, form and materials used to protect and maintain heritage values of the heritage item, including integration with and connection to other parts of the item during and after strengthening works; and</u></p> <p><u>2. how it is proposed to document changes to the heritage item during the course of works and on completion of the strengthening; and</u></p> <p><u>3. the necessity of the work to achieve seismic resilience and ongoing use.</u></p>
Fonterra Limited	165.71	HH - Historic Heritage	Rules	HH-R5 External strengthening of a Historic Heritage Item	Considers that this rule should be amended to only apply to Category A heritage items.	<p>Amend HH-R5 External strengthening of Historic Heritage Item as follows:</p> <p>External strengthening of <u>a Category A</u> Historic Heritage Item</p> <p>[...]</p>
Fonterra Limited	165.72	HH - Historic Heritage	Rules	General	Considers that a new restricted discretionary activity rule should be included to provide for signs (not including official signs) on Category B heritage items.	<p>Insert a new rule into the HH-Historic Heritage Chapter as follows:</p> <p><u>Signs attached to a Category B Historic Heritage Item, excluding official signs</u></p> <p><u>Activity status: Restricted discretionary</u></p> <p><u>Matters of discretion are restricted to:</u></p> <p><u>1. any impact on heritage values; and</u></p> <p><u>2. any positive effects of the sign.</u></p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fonterra Limited	165.73	HH - Historic Heritage	Rules	HH-R6 Signs attached to a Historic Heritage Item	Considers that 'official signs' attached to heritage items should be permitted activities. Furthermore, considers that this rule should be amended to only apply to Category A heritage items.	Amend HH-R6 Signs attached to a Historic Heritage Item as follows: <i>Signs attached to a <u>Category A</u> Historic Heritage Item, <u>excluding official signs external alterations and additions to a heritage item.</u></i> [...]
Fonterra Limited	165.74	HH - Historic Heritage	Rules	General	Considers that a new rule should provide for external additions and alterations to a Category B heritage item as a restricted discretionary activity.	Insert a new rule into the HH-Historic Heritage Chapter as follows: <u>External alterations and additions to a Category B heritage item (excluding strengthening)</u> <u>Activity status: Restricted Discretionary</u> <u>Matters of discretion are restricted to:</u> <u>1. methodologies, design, form and materials used to protect and maintain heritage values of the heritage item, including integration with and connection to other parts of the item during and after works; and</u> <u>2. how it is proposed to document changes to the heritage item during the course of works and on completion of the works; and</u> <u>3. the necessity of the work to achieve ongoing use.</u>
Fonterra Limited	165.75	HH - Historic Heritage	Rules	HH-R7 External alterations and additions to a Historic Heritage Item	Considers that external alterations and additions to Category B heritage items should be provided for as a restricted discretionary activity (rather than discretionary). Accordingly, amendments are required to R7.	Amend HH-R7 External alterations and additions to a Historic Heritage Item as follows: <i>External alterations and additions to a <u>Category A</u> heritage item (excluding strengthening)</i> [...]
Fonterra Limited	165.76	HH - Historic Heritage	Rules	HH-R8 Relocation of a heritage item within or outside a heritage setting	Supports the activity status and proposed wording of this rule as it is appropriate to provide for relocation.	Retain as notified.
Fonterra Limited	165.77	HH - Historic Heritage	Rules	HH-R9 Demolition of a Category B Historic Heritage Item	Supports the activity status and proposed wording of this rule as it is appropriate to provide for demolition.	Retain as notified.
Fonterra Limited	165.78	HH - Historic Heritage	Rules	HH-R10 Subdivision of land containing a Historic Heritage Item	Considers that subdivision involving a heritage item can be provided for as a restricted discretionary activity.	Amend HH-R10 Subdivision of land containing a Historic Heritage Item as follows: <u>Activity status: Discretionary</u> <u>Activity status: Restricted Discretionary</u> <u>Matters of discretion are restricted to:</u> <u>1. Whether the subdivision maintains the heritage setting;</u> <u>2. Whether the subdivision would result in a disconnect with adjoining sites that assists in heritage interpretation; and</u> <u>3. Whether sufficient area is achieved on the balance site to comply with the zone standards and avoid adversely affecting the heritage item.</u>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fonterra Limited	165.79	SASM - Sites and Areas of Significance to Maori	Rules	SASM-R1 Earthworks not including quarrying and mining	Considers that a specific exemption should be provided for earthworks at the Clandeboye site due to the heavily modified nature of the site.	Amend SASM-R1 Earthworks not including quarrying and mining as follows: SASM-R1 1. <u>Wāhi Tupuna Overlay (excluding the Māori Purpose Zone and the Strategic Rural Industry Zone (Clandeboye in SASM-5))</u>
Fonterra Limited	165.80	VS - Versatile Soil	General	General	Considers that the PDP needs to give effect to the National Policy Statement for Highly Productive Land 2022 (NPSHPL).	Amend the PDP to give effect to the NPSHPL.
Fonterra Limited	165.81	VS - Versatile Soil	Policies	VS-P2 Maintaining availability of versatile soil	Supports the recognition activities that have a functional or operational need to locate on versatile soils.	Retain as notified.
Fonterra Limited	165.82	SUB - Subdivision	Objectives	SUB-O1 General subdivision design	Considers that the objective should be more explicit in relation to reverse sensitivity effects.	Amend SUB-O1 General subdivision design as follows: <i>New subdivisions will:</i> [...] 10. not intentionally prevent, hinder or limit the <u>use or</u> development of adjoining or adjacent land, including by way of reverse sensitivity effects.
Fonterra Limited	165.83	SUB - Subdivision	Objectives	SUB-O3 Rural subdivision	Considers that the objective should be more explicit in relation to reverse sensitivity effects.	Amend SUB-O3 Rural subdivision as follows: <i>Subdivision in the rural zones will:</i> [...] 4. <u>minimise avoid</u> reverse sensitivity effects on <u>intensive</u> primary production <u>and rural industry.</u>
Fonterra Limited	165.84	SUB - Subdivision	Policies	SUB-P3 Disruptive Subdivision	Considers that the policy should be more explicit in relation to reverse sensitivity effects.	Amend SUB-P3 Disruptive Subdivision as follows: <i>Avoid subdivisions that are intended to prevent, hinder or limit the <u>use or</u> development of adjoining or adjacent land, unless it is done to comply with a Council approved Development Area Plan. including by way of reverse sensitivity effects.</i>
Fonterra Limited	165.85	SUB - Subdivision	Policies	SUB-P5 Reverse Sensitivity	Considers that the policy should be more explicit in relation to reverse sensitivity effects.	Amend SUB-P5 Reverse Sensitivity as follows: <i>Only allow subdivision that does not result in reverse sensitivity effects that would compromise the operation of regionally significant infrastructure/facilities, and legally established intensive primary production <u>and rural industry.</u></i>
Fonterra Limited	165.86	SUB - Subdivision	Policies	SUB-P15 Rural Lifestyle Zone	Considers that the objective should be more explicit in relation to reverse sensitivity effects.	Amend SUB-P15 Rural Lifestyle Zone Require as follows: <i>Require subdivision in the Rural Lifestyle Zone to:</i> [...] 5. <u>avoid reverse sensitivity effects on existing or permitted primary production and rural industry activities.</u>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fonterra Limited	165.87	SUB - Subdivision	Standards	SUB-S1 Allotment sizes and dimensions	Considers that a 40ha minimum lot size in the General Rural Zone is appropriate.	Retain SUB1.3 as notified.
Fonterra Limited	165.88	CE - Coastal Environment	Objectives	CE-O6 Existing urban activities	Considers that it is appropriate to provide for existing urban activities.	Retain as notified.
Fonterra Limited	165.89	CE - Coastal Environment	Policies	CE-P9 Anticipated activities	Considers that it is appropriate to provide for appropriately sized and located structures in the coastal environment.	Retain as notified.
Fonterra Limited	165.90	CE - Coastal Environment	Policies	CE-P10 Preserving the natural character of the Coastal Environment	Supports the recognition that some activities have a functional need to locate in areas with coastal environment.	Amend CE-P10 Preserving the natural character as follows: <i>Enable subdivision, use and development outside of areas of coastal high natural character that:</i> [...] <i>1. Avoids, remedies or mitigates any other adverse effects on the qualities that contribute to the natural character of the Coastal Environment; while recognising that:</i> <i>(a) in rural zoned areas, buildings and structures for non-intensive primary production, <u>rural industry</u> and residential activities may be appropriate depending on their size, scale and nature;</i> [...]
Fonterra Limited	165.91	CE - Coastal Environment	Rules	CE-R4 Buildings and structures and extensions (excluding Regionally Significant Infrastructure and fences)	It is appropriate to provide for buildings, structures and extensions in the coastal environment overlay as a permitted activity.	Retain as notified.
Fonterra Limited	165.92	CE - Coastal Environment	Rules	CE-R6 Land disturbance	It is appropriate to provide for land disturbance as a permitted activity.	Retain as notified.
Fonterra Limited	165.93	CE - Coastal Environment	Standards	CE-S1 Height of buildings and structures	Considers that the permitted height of structures is appropriate.	Retain as notified.
Fonterra Limited	165.94	CE - Coastal Environment	Standards	CE-S2 Site coverage	Considers that the permitted site coverage is appropriate	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fonterra Limited	165.95	EW - Earthworks	Standards	EW-S1 Areas	Considers that the scale and isolation of the Clandeboye site means that earthworks at the site should be unrestricted. In the event that significant earthworks are carried out, these will be managed by way of a Regional Council resource consent process.	Amend EW-S1 Areas as follows: 1. General Rural Zone Rural Lifestyle Zone <u>Strategic Rural Industry Zone</u> Areas The area of earthworks must be limited to as follows: 1. for any primary production activity that is a Permitted Activity in the zone, there is no limit; and 2. for any ancillary rural earthworks, there is no limit; and 3. for other activities: 2,000m² in any 12-month period per site; <u>and</u> 4. <u>for any Permitted Activity in the Strategic Rural Industry Zone, there is no limit.</u>
Fonterra Limited	165.96	DWP - Drinking Water Protection	Rules	DWP-R5 Industrial activities including rural industry	Submitter does not consider it appropriate for existing activities, or the expansion of existing activities, which have had no impact on drinking water supply to be classified as a non-complying activity.	Delete DWP-R5 Industrial activities including rural industry. OR Alternatively, if this requested relief sought is not granted, then exclude the proposed SRIZ from the rule.
Fonterra Limited	165.97	LIGHT - Light	Objectives	LIGHT-O1 Artificial outdoor lighting	It is appropriate that lighting is provided that responds to the different zone amenities	Retain as notified.
Fonterra Limited	165.98	LIGHT - Light	Objectives	LIGHT-O2 Benefits of artificial lighting	It is appropriate that the benefits of lighting are recognised.	Retain as notified.
Fonterra Limited	165.99	LIGHT - Light	Policies	LIGHT-P1 Appropriate artificial outdoor lighting	It is appropriate to provide for artificial lighting that ensures safety and supports economic wellbeing.	Retain as notified.
Fonterra Limited	165.100	LIGHT - Light	Policies	LIGHT-P3 Health and safety	Fonterra supports the exemption of lighting to meet the health and safety needs of people.	Retain as notified.
Fonterra Limited	165.101	LIGHT - Light	Rules	LIGHT-R1 Artificial outdoor lighting outside light sensitive areas	Considers a consequential change is needed to reflect the new LIGHT rule proposed to specifically address the SPZ-SRI. Considers that lighting exemptions comparable to the Port Zone provisions (LIGHT [1] R1.2) should also apply to the Fonterra Clandeboye site	Amend LIGHT-R1 Artificial outdoor lighting as follows: LIGHT-R1 1. All zones other than Port Zone <u>and the Strategic Rural Industry Zone</u> outside Light Sensitive Areas

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
						<p>AND</p> <p>Add a new rule as follows:</p> <p><u>LIGHT-R1. 3 Strategic Rural Industry Zone</u></p> <p><u>Activity status: Permitted</u></p> <p><u>Where:</u></p> <p><u>PER-1 All exterior lighting must be oriented so that light is emitted away from any adjoining and adjacent zone; and</u></p> <p><u>PER-2 LIGHT S-2 is complied with; and</u></p> <p><u>PER-3 The horizontal and vertical illuminance levels (above the background level) at the notional boundary of the General Rural Zone between 10pm - 7am do not exceed 5 lux; and</u></p> <p><u>PER-4 The vertical illuminance level at a window of an adjoining property in the General Rural Zone between 10pm and 7am does not exceed 5 lux.</u></p>
Fonterra Limited	165.102	LIGHT - Light	Rules	LIGHT-R2 Outdoor artificial lighting for health and safety	The Port Zone is a 24-hour port operation and in such circumstances, lighting is an important health and safety feature. The rule should be directed at ensuring such lighting is directed away from residential properties rather than properties associated with Industrial or Port Activities within the Port Zone	<p>Amend LIGHT-R2 Outdoor artificial lighting for health as follows:</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1</p> <p><i>All exterior lighting must be oriented so that light is emitted away from any adjoining and adjacent zones properties; and</i></p> <p>[...]</p>
Fonterra Limited	165.103	LIGHT - Light	Standards	LIGHT-S1 General lighting standards	Supports the exemption of the Port Zone from LIGHT-S1 General lighting standards. Considers the exemption should also apply to the SRIZ.	<p>Amend LIGHT-S1 General lighting standards as follows:</p> <p>LIGHT-S1</p> <p><u>All zones (excluding Port Zone and the Strategic Rural Industry Zone).</u></p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fonterra Limited	165.104	LIGHT - Light	Standards	LIGHT-S2 Traffic safety on roads	Considers it is appropriate to add the SRIZ to Table 23.	Amend Table 23 (righthand column) as follows: Town Centre Zone; Local Centre Zone; Large Format Retail Zone; City Centre Zone; Sports and Active Recreation Zone; General Industrial Zone; Port Zone <u>Strategic Rural Industry Zone</u>
Fonterra Limited	165.105	NOISE - Noise	Introduction	General	It is important that key industry and employment generators are recognised as being constrained by reverse sensitivity effects arising from inappropriately located sensitive activities.	Amend the Introduction to the NOISE-Noise Chapter as follows: <i>[...] This is a particular concern for key industry and employment generators, important services and community facilities, including the Airport, Raceway, State Highway, Railway Corridor and the Port, which could be constrained if reverse sensitivity effects arise [...]</i>
Fonterra Limited	165.106	NOISE - Noise	Objectives	NOISE-O1 Activities that generate noise	It is considered appropriate that noise effects are appropriate to the zone.	Retain as notified.
Fonterra Limited	165.107	NOISE - Noise	Objectives	NOISE-O2 Reverse sensitivity	Considers that the SPZ-SRI is explicitly recognised in this objective. Furthermore, it is considered more appropriate for reverse sensitivity effects to be avoided.	Amend NOISE-O2 Reverse sensitivity as follows: <i>The Airport, Raceway, State Highway, railway lines, and the Port, <u>the Strategic Rural Industry Zone</u> and activities located within commercial, mixed use and Industrial zones are <u>protected from not constrained by</u> reverse sensitivity effects arising from noise sensitive activities.</i>
Fonterra Limited	165.108	NOISE - Noise	Policies	NOISE-P1 Maintenance of zone character and qualities	It is considered appropriate that noise effects are appropriate to the zone.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fonterra Limited	165.109	NOISE - Noise	Policies	NOISE-P5 Reverse sensitivity	This policy does not relate to reverse sensitivity, rather it relates to effects on incompatible activities. Accordingly, the policy title should be amended. Supports the reference to the Port Noise Inner Control Boundary Overlay. The new Clandeboye Noise Control Boundary needs including in this policy to ensure that the new noise controls are tied to appropriate policy	Amend NOISE-P5 Reverse sensitivity as follows: Reverse sensitivity Effects on incompatible activities Require noise sensitive activities located in higher noise environments to be located and designed so as to minimise adverse effects on the amenity values and health and safety of occupants and minimise sleep disturbance from noise, while taking into account: ... For the purpose of this Policy, higher noise environments include: [...] 4. that part of the General Rural Zone located within the Clandeboye Noise Control Boundary.
Fonterra Limited	165.110	NOISE - Noise	Policies	NOISE-P7 Noise sensitive activities within noise control boundaries	Supports the reference to the Port Noise Inner Control Boundary Overlay, however it also seeks that the proposed Clandeboye Noise Control Boundary be included in the Policy. It is important that noise sensitive activities do not result in reverse sensitivity effects on operations at the Clandeboye manufacturing site.	Amend NOISE-P7 Noise sensitive activities as follows: Within the Airport Noise Control Boundary Overlay, <u>Clandeboye Noise Control Boundary</u> and Port Noise Inner Control Boundary Overlay [...]
Fonterra Limited	165.111	NOISE - Noise	Rules	New	Submitter has worked closely with its noise consultants to develop a NCB for its manufacturing sites throughout New Zealand. A NCB is an effective way of managing noise (and expectations associated with noise) for a large noise generating activity. Proposed noise management includes restrictions on sensitive activities within the NCB, and noise emission standards appropriate to the operational requirements and the environmental factors of Clandeboye. Submitter is seeking to have the new noise provisions inserted into the Noise chapter of the PDP.	Add a new rule to the NOISE-Noise Chapter as follows: <u>Noise from the Fonterra Clandeboye manufacturing site</u> <u>PER-1</u> <u>On the Clandeboye manufacturing site, noise from operations, including all ancillary equipment, maintenance activities, and operation of all vehicles on site (including those entering and exiting the site), shall not exceed the following limits when measured at or beyond the Noise Control Boundary:</u> <u>Weekdays and Weekends</u> <u>7am - 10pm 55dB LAeq (15 min)</u> <u>10pm - 7am 45 dB LAeq (15 min) and 75 LAFmax</u> <u>Non-compliance with this requirement shall restrict the exercise of its discretion to the operational requirements of the site, and the effect of noise on adjoining sensitive activities within the Noise Control Boundary.</u>
Fonterra Limited	165.112	NOISE - Noise	Rules	NOISE-R8 Noise from activities within the Port Zone	Supports this rule but notes that part of the Port Zone (to the south) is not covered by either of the noise control boundaries and therefore no rule appears to apply. It is considered a further permitted status is required.	Amend NOISE-R8 Noise from activities within the Port as follows: [...] <u>PER-4</u> <u>For any activity within the Port zone but outside of the Port Noise Control Boundaries shown on the planning maps, the following noise limit applies: on any day between 10pm to 7am the following day, noise generated must not exceed 45 dB LAeq (9 hours) when measured at or within any residentially zoned site, provided that any single 15 minute sound measurement level must not exceed 50 dB LAeq and 75 dB LAmx.</u>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fonterra Limited	165.113	NOISE - Noise	Rules	NOISE-R9 Any new building for use by a noise sensitive activity and alterations to existing buildings for use by a noise sensitive activity (not listed in NOISE-R12)	Considers that the Clandeboye NCB should be provided for in R9. Furthermore, that a noncompliance with NOISE-R9 should result in a non-complying status.	Amend NOISE-R9 Any new building as follows: Add ' <i>Clandeboye Noise Control Boundary</i> ' to the left column. Activity status when compliance not achieved with PER-1.1 or PER-2: <u>Non-complying Restricted Discretionary</u> <i>Matters of discretion are restricted to:</i> <i>1. the matters of discretion of any infringed standard.</i> <i>2. for activities in breach PER 2, the matters of discretion of NOISE-S3.</i>
Fonterra Limited	165.114	NOISE - Noise	Standards	NOISE-S3 Acoustic insulation	Given that NOISE-S3 only relates to NOISE-R9, Submitters are seeking that the non-compliance status be amended to non-complying (rather than restricted discretionary), it is not necessary to list the matters of discretion.	Delete the matters of discretion from NOISE-S3 Acoustic insulation.
Fonterra Limited	165.115	NOISE - Noise	Standards	NOISE-S4 Ventilation requirements	Given that NOISE-S4 only relates to NOISE-R9, Submitters are seeking that the non-compliance status be amended to non-complying (rather than restricted discretionary), it is not necessary to list the matters of discretion.	Delete the matters of discretion from NOISE-S4 Ventilation requirements.
Fonterra Limited	165.116	NOISE - Noise	Standards	Table 24 - Noise Performance Standards	Clauses 1b and 2 appear to have missed the fact that the Port Zone extends south to the south where it is opposite but separated from General and Medium Density Residential Zones.	Amend Table 24 , clauses 1b and 2 as follows: <i>1b. Within any part of a site in the General Residential Zone <u>except that this standard shall not apply to noise generated from within the Port Zone.</u></i> <i>2. Within any part of a site in the Medium Density Residential Zone, but, <u>except that this standard shall not apply to where noise is generated from within the Port Zone, excluding those sites located between the Terrace and the Main South Railway Line.</u></i>
Fonterra Limited	165.116A	NOISE - Noise	Standards	Table 24 - Noise Performance Standards	Clause 4 indicates that it is the intention of the Plan to address noise from the Port Zone separately.	Retain clause 4.
Fonterra Limited	165.117	SIGN - Signs	Objectives	SIGN-O1 Signs	It is appropriate to recognise the benefits of signage to the district.	Retain as notified.
Fonterra Limited	165.118	SIGN - Signs	Policies	SIGN-P1 Managing the effects of signs	It is appropriate that signs are generally enabled, but their effects (relative to the zone) are managed.	Retain as notified.
Fonterra Limited	165.119	SIGN - Signs	Rules	SIGN-R1 Official signs	Supports the activity status of official signs.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fonterra Limited	165.120	SIGN - Signs	Rules	SIGN-R4 Any signs not otherwise address in the Rules section of this chapter	Considers the permitted activity status and parameters as appropriate. Submitter considers that the SRIZ should be added to SIGN-R4.3	Amend SIGN-R4 as follows: [...] 3. General industrial one Port Zone <u>Strategic Rural Industry Zone</u>
Fonterra Limited	165.121	SIGN - Signs	Standards	SIGN-S3 Maximum height of signage	The permitted activity status and parameters are considered appropriate. Submitter considers that the SRIZ should be added to SIGN-S3.2.	Amend SIGN-S3 Maximum height of signage as follows: [...] 2. Commercial and Mixed Use zones Open Space and Recreation zones General Industrial Zone Port Zone <u>Strategic Rural Industry Zone</u>
Fonterra Limited	165.122	SIGN - Signs	Standards	SIGN-S4 Maximum area of a sign	The permitted activity status and parameters are considered appropriate. Submitter considers that the SRIZ should be added to SIGN-S4.6.	Amend SIGN-S4 Maximum area of a sign as follows: [...] 6. General Industrial Zone Port Zone <u>Strategic Rural Industry Zone</u>
Fonterra Limited	165.123	SIGN - Signs	Standards	SIGN-S6 Maximum number of signs (not including Official signs and Temporary signs)	The permitted activity status and parameters are considered appropriate. Submitter considers that the SRIZ should be added to SIGN-S6.1	Amend SIGN-S6 Maximum number of signs as follows: 1. Commercial and Mixed Use zones General industrial Zone Port Zone <u>Strategic Rural Industry Zone</u>
Fonterra Limited	165.124	GRUZ - General Rural Zone	Objectives	GRUZ-O1 Purpose of the General Rural Zone	It is appropriate that the General Rural Zone provides for primary production and activities that support primary production, such as rural industry.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fonterra Limited	165.125	GRUZ - General Rural Zone	Objectives	GRUZ-O3 Protecting primary production	It is appropriate to protect primary production from sensitive activities. This protection should also be afforded to rural industry that is located in the general rural zone.	Amend GRUZ-O3 Protecting primary production as follows: <i>The land resource of the General Rural Zone is not diminished by activities with no functional or operational need to locate in the General Rural Zone, and primary production <u>is and rural industry are</u> protected from sensitive activities.</i>
Fonterra Limited	165.126	GRUZ - General Rural Zone	Policies	GRUZ-P7 Industrial activities, rural industries and other activities	Generally supports the proposed wording of this policy but considers that the word 'only' should be deleted.	Amend GRUZ-P7 Industrial activities as follows: Only a Allow rural industries and other activities (not listed in the rules) in the General Rural Zone where: [...]
Fonterra Limited	165.127	GRUZ - General Rural Zone	Policies	New	The Clandeboye site is surrounded by rural land. It is important that subdivision, use and development does not constrain Clandeboye's operations through reverse sensitivity effects.	Add new policy to the GRUZ - General Rural Zone Chapter as follows: <u>GRUZ-PX Reverse sensitivity</u> <i>Subdivision, use and development in rural areas must avoid adverse reverse sensitivity effects on strategic rural industrial activities.</i>
Fonterra Limited	165.128	GRUZ - General Rural Zone	Rules	GRUZ-R21 Rural industry	Consider it is appropriate to provide for rural industry activities as restricted discretionary activities.	Retain as notified.
Fonterra Limited	165.129	GRUZ - General Rural Zone	Standards	GRUZ-S4 Setbacks for sensitive activities	Considers that it is appropriate that sensitive activities are setback 500m from its irrigation farms. Specifically, submitter holds regional resource consents to irrigate process wastewater to land on (Submitter owned) farms near the Clandeboye manufacturing site. This irrigation activity has the potential to give rise to perceived amenity effects at times and an increased building setback from boundaries will ensure that effects on neighbouring properties are acceptable.	Amend GRUZ-S4 Setbacks for sensitive activities as follows: 1. No new sensitive activity may be established within 500m from: [...] <i>d. The boundary of any area used for the discharge of wastewater irrigation.</i>
Fonterra Limited	165.130	GIZ - General Industrial Zone	Introduction	General	The Introduction appropriately summarises the purpose and character of the General Industrial Zone.	Retain as notified.
Fonterra Limited	165.131	GIZ - General Industrial Zone	Objectives	GIZ-O1 The purpose of the General Industrial Zone	It is appropriate to define the purpose of the zone.	Retain as notified.
Fonterra Limited	165.132	GIZ - General Industrial Zone	Objectives	GIZ-O2 Character and qualities of the General Industrial Zone	It is appropriate to define the character and qualities anticipated for the zone and enable activities that have these characters and qualities	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fonterra Limited	165.133	GIZ - General Industrial Zone	Objectives	GIZ-O3 Use and development in the General Industrial Zone	It is appropriate to define the use and development anticipated for the zone, in particular the need to ensure that the zone is not compromised by the establishment of sensitive activities.	Retain as notified.
Fonterra Limited	165.134	GIZ - General Industrial Zone	Policies	GIZ-P1 Industrial activities	It is appropriate to define the types of activities anticipated in the zone	Retain as notified.
Fonterra Limited	165.135	GIZ - General Industrial Zone	Policies	GIZ-P3 Streetscape and amenity values	While Submitter acknowledges that the amenity of the zone should be maintained, it is important that the purpose of the zone is not undermined by maintaining the amenity for adjoining zones.	Amend GIZ-P3 Streetscape and amenity values as follows: <i>Maintain the amenity of the zone, while providing additional controls at the road boundary and zone boundary to manage the zone interface. values of the streetscape, the Residential Zones, and Open Space and Recreation Zones, by requiring:</i> <i>1. storage areas to be screened from road boundaries and Residential Zones; and</i> <i>2. landscaping along road boundaries and boundaries that adjoining the Open Space and Recreation Zones; and</i> <i>3. buildings and structures to be a height and setback that will ensure adjoining Residential zones and Open Space and Recreation Zones:</i> <i>a. have a reasonable standard of sunlight access; and</i> <i>b. are not unreasonably dominated by built form; and</i> <i>c. maintain privacy of adjoining Residential Zones; and</i> <i>4. buildings to be a colour and reflectivity that does not detract from the amenity of Residential Zones.</i>
Fonterra Limited	165.136	GIZ - General Industrial Zone	Policies	GIZ-P6 Other activities	It is appropriate that 'other activities' are tightly controlled so as not to undermine the purpose of the GIZ.	Retain as notified.
Fonterra Limited	165.137	GIZ - General Industrial Zone	Standards	GIZ-S2 Maximum height of buildings and structures	The Clandeboye manufacturing site includes buildings (and may require further buildings in the future) that exceed the permitted height limit. The revision to the S2.2 is based on the current maximum building height on the site.	Amend GIZ-S2 Maximum height of buildings as follows: <i>Buildings and structures must not exceed a maximum height of 35m55m measured from ground level.</i>
Fonterra Limited	165.138	GIZ - General Industrial Zone	Standards	GIZ-S3 Setbacks of buildings and structures excluding fences	Considers a 3m setback in the GIZ is appropriate	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fonterra Limited	165.139	GIZ - General Industrial Zone	Standards	GIZ-S6 Landscaping and bund(s)	Submitter does not consider that a 3m landscape strip is effective to mitigate against the scale of activities existing and anticipated on the site. Furthermore, submitter considers that birds are problematic from a milk processing / sanitation perspective and seek to avoid nesting opportunities on the site.	Amend GIZ-S6 Landscaping and bund(s) as follows: 1. General Industrial Zone <u>(excluding the Height Specific Control Area)</u>
Fonterra Limited	165.140	PORTZ - Port Zone	Objectives	PORTZ-O1 Purpose of the Port Zone	The proposed wording is considered appropriate.	Retain as notified.
Fonterra Limited	165.141	PORTZ - Port Zone	Policies	PORTZ-P1 Compatible activities in the Port Zone	The proposed wording is considered appropriate	Retain as notified.
Fonterra Limited	165.142	PORTZ - Port Zone	Rules	PORTZ-R3 Industrial activity	The proposed wording is considered appropriate.	Retain as notified.
Fonterra Limited	165.143	PORTZ - Port Zone	Standards	PORTZ-S1 Height of buildings and structures	The proposed wording is considered appropriate	Retain as notified.
Fonterra Limited	165.144	HH - Historic Heritage	Objectives	HH-O2 Protection of values	Fonterra supports the proposed wording of this objective.	Retain as notified.
Fonterra Limited	165.145			SUB-P14 Rural allotments	Fonterra supports the policy as proposed.	Retain as notified.
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.1	General	General	General	As specified in particular provisions. The decisions sought in this submission are required to ensure that the proposed Timaru District Plan: Gives effect to New Zealand Coastal Policy Statement 2010, the National Policy Statement for Freshwater Management 2020, and the Canterbury Regional Policy Statement; Recognises and provides for the matters of national importance listed in section 6 of the Act and to has particular regard to the other matters in section 7 of the Act; Promotes the sustainable management of natural and physical resources; and The changes sought are necessary, appropriate and sound resource management practice.	a. That the particular provisions of Proposed Plan that I support, as identified in Attachment 1, are retained; b. That the amendments, additions and deletions to Proposed Plan sought in Attachments 1 are made; and c. Further or alternative relief to like effect to that sought in a. and b. above, including consequential changes or changes required for consistency.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.2	Definitions	Definitions	General	Supports the proposed definitions as providing appropriate clarity and certainty for plan users and aligning with the RMA and higher order documents.	Retain all definitions as notified, except where specific changes are requested in the submission.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.3	Definitions	Definitions	General	The submitter supports the inclusion of the RMA definitions in the plan such as 'biodiversity' and 'coastal water'. This is helpful when using the E-Plan.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.4	Definitions	Definitions	Biodiversity Management Plan	The submitter supports the inclusion of this definition. It is noted that Biodiversity Management Plans are required as a matter of discretion for vegetation clearance within Significant Natural Areas (SNAs). These are encouraged to assist with the protection or enhancement of indigenous vegetation and habitats.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.5	Definitions	Definitions	Clearance of indigenous vegetation	The submitter supports the proposed definition however seeks amendments to make it explicit that this also includes any activity that destroys indigenous vegetation	Amend the definition of Clearance of Indigenous Vegetation as follows: <i>Means <u>any activity that destroys or removes indigenous vegetation</u> means the clearing or removal of 'indigenous vegetation' by any means, including <u>clearing</u>, grazing, cutting, crushing, cultivation, spraying, irrigation, chemical application, artificial drainage, overplanting, over sowing, or burning.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.6	Definitions	Definitions	Department of Conservation Activity	<p>The submitter considers that there should be a wider definition for 'conservation activity' rather than making it specific to the Department of Conservation activities. This is given that there are other stakeholders which may undertake conservation activities such as landowners, Forest and Bird and other community groups. This ensures that conservation activities are provided for within the plan which don't fall under Section 4(3).</p> <p>It is also noted that the description in the introduction of the Natural Open Space Zone provides an explanation of the RMA requirements which exempt activities for land managed under the Conservation Act 1987 so it is not considered necessary to be repeat this in a definition.</p> <p>It is also noted that the term 'Conservation Activity' is used in the Rural Zone provisions but there is no definition of what this includes (see related submission point on the GRUZ chapter).</p>	<p>Delete the definition of Department of Conservation Activity and replace with the new definition as follows:</p> <p><u>Conservation Activity</u> <u>Means the use of land for any activity undertaken for the purposes of management, maintenance and enhancement of ecological values for indigenous vegetation and fauna and their habitats.</u> <u>Examples of component activities of conservation are:</u></p> <ul style="list-style-type: none"> • <u>Restoration planting</u> • <u>Pest and weed control</u> • <u>Track construction and maintenance</u> • <u>Fencing.</u>
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.7	Definitions	Definitions	Indigenous Vegetation	The Submitter supports the definition, which is consistent with the draft NPSIB.	Retain as notified.
Penny Nelson, Director- General of Conservation	166.8	Definitions	Definitions	Light Sensitive Area	<p>Considers the definition should also include the Bat Protection Area overlay as lighting can negatively affect Long-Tailed bat activity and behaviour.</p> <p>[see original submission for full reason]</p>	<p>Amend the definition of Light Sensitive Area as follows:</p> <p><i>Includes land in the following areas outside of the Port Zone:</i></p> <p><i>a. Wāhi tapu, Wāhi taoka and Wai taoka Overlays</i></p>
Tumuaki Ahurei						<p><i>b. Significant Natural Areas Overlay</i></p> <p><i>c. Outstanding Natural Landscapes Overlay</i></p> <p><i>d. Visual Amenity Landscape Overlay</i></p> <p><i>e. the Rural Lifestyle Zone;</i></p> <p><i><u>f. Bat Protection Area Overlay;</u> and</i></p> <p><i><u>fg. the Natural Open Space Zone.</u></i></p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.9	Definitions	Definitions	Riparian Margin	The submitter supports this definition.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.10	Definitions	Definitions	Riparian Zone [in relation to a river or lake]	The submitter supports this definition and notes that it is consistent with the Canterbury Regional Policy Statement.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.11	Definitions	Definitions	Sensitive Environment	The submitter supports the definition as it includes the Coastal Environment, Significant Natural Areas and other overlays of significance. However, the submitter seeks that the definition is amended to include the Bat Protection Overlay. [see original submission for full reason]	Amend the definition of Sensitive Environment as follows: <i>means</i> <i>1. areas within the following overlays identified on the Planning map:</i> <i>a. Coastal Environment; and</i> <i>[...]</i> <i>[...] and</i> <i><u>p. Bat Protection Area Overlay; and</u></i> <i>[...]</i>
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.12	Definitions	Definitions	Significant Natural Area or SNA	The submitter supports the identification of SNA's as set out in SCHED7 and on the planning maps. However, SNA status criteria could also be applied to new areas that have not yet been identified and mapped as an area of significant indigenous vegetation, or significant habitat of indigenous fauna. This would require an assessment of any new areas against the Criteria in Appendix 5 of the plan. The suggested amendment would also make the definition consistent with the draft NPS-IB definition for SNA and Policy 6. Amend the definition to correct the reference from ECO- SCHED 2 to SCHED 7.	Amend the definition of Significant Natural Area as follows: <i>Means</i> <i>a. identified areas of significant indigenous vegetation and significant habitats of indigenous fauna, as set out in <u>ECO-SCHED2-SCHED7</u> and shown on the Planning Maps; or</i> <i><u>b. areas that have been assessed as an area of significant indigenous vegetation or significant habitat of indigenous fauna in accordance with the criteria set out in APP5.</u></i>
					It is noted that the SNA definition may need to be reviewed in accordance with any future nationally developed criteria under the NPS IB.	

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.13	Definitions	Definitions	New	The submitter supports the mapping of the coastal environment, however, seeks the inclusion of a definition of coastal environment consistent with Policy 1 of the New Zealand Coastal Policy Statement (NCPS). The Canterbury Regional Policy Statement (CPRS) defines 'Coastal Environment' as 'The extent and characteristics of the coastal environment is defined by Policy 1 of the New Zealand Coastal Policy Statement (2010)'.	Add a new definition of ' Coastal Environment ' consistent with the definition of 'coastal environment' in the CRPS.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.14	Definitions	Definitions	New	In relation to other submission points made by the Submitter, seeks that the effects management hierarchy is defined in the Plan to ensure that there is an appropriate cascade of effects management approaches, starting with avoidance, and ending with offsetting or compensation of residual adverse effects, to appropriate manage adverse effects on significant values. The draft National Policy Statement for Indigenous Biodiversity (NPS-IB) gives meaning to the effects management hierarchy in Clause 1.5(4).	Add a new definition of ' Effects Management Hierarchy ' which is generally consistent with the draft National Policy Statement for Indigenous Biodiversity (NPS-IB).
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.15	Definitions	Definitions	New	Insert new definition for "compensation", as the term is used within the Ecosystems and Indigenous Biodiversity chapter, it is considered necessary to define the term so it's meaning is clear. The draft National Policy Statement for Indigenous Biodiversity (NPS-IB) contains a definition for 'Biodiversity Compensation' which is recommended.	Add a new definition for ' Compensation ' as follows (or words to similar effect): <u>Compensation</u> <u>Means any positive actions (excluding biodiversity offsets) to compensate for residual adverse biodiversity effects arising from activities after all appropriate avoidance, remediation, mitigation and biodiversity offset measures have been sequentially applied.</u>
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.16	Definitions	Definitions	New	New Definition - 'Biodiversity Offset': Insert new definition of 'Biodiversity Offset'. Providing for the use of biodiversity offset (where the effects management hierarchy has been applied), enables Councils and applicants to address any residual adverse effects, that cannot otherwise be demonstrably avoided, minimised, or remedied as a result of the proposed activity. This aligns with Section 104(1)(b) of the RMA and the draft National Policy Statement for Indigenous Biodiversity (NPS-IB) which includes offsetting to address residual effects via the effects management hierarchy. The definition recommended for 'Biodiversity Offset' has been copied from the NPS-IB.	Add a new definition for ' biodiversity offset ' as follows (or words to similar effect): <u>Biodiversity offset</u> <u>means a measurable conservation outcome that results from actions that:</u> <u>a. redress any more than minor residual adverse effects on indigenous biodiversity after all appropriate avoidance, minimisation, and remediation measures have been sequentially applied;</u> <u>and</u> <u>b. achieves a measurable net gain compared to that lost.</u>
Penny Nelson, Director- General of Conservation	166.17	Definitions	Definitions	New	Insert new definition of 'risk' as this is a term used in the Plan when considering natural hazards.	Add a new definition for ' risk ' consistent with the definition of risk in the New Zealand Coastal Policy Statement (NZCPS).

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Tumuaki Ahurei						
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.18	SD - Strategic Direction	Objectives	SD-O2 The Natural and Historic Environment	<p>The Submitter supports the intent of the strategic directions for the natural environment but considers that an overarching requirement to promote the increase of indigenous vegetation cover in the district is needed. This is consistent with the draft NPS-IB (Policy 14).</p> <p>The strategic direction should also set out the maintenance and enhancement of indigenous biodiversity outside of SNAs as required by the RMA (Part 2 (7) & Section 31) and Policy 4, 5, 8 & 13 of the draft NPS-IB which seeks to recognise the importance of maintaining and providing for indigenous biodiversity outside SNAs as well as ensuring that biodiversity is resilient to the effects of climate change and managed in an integrated way. This is also consistent with the Canterbury Regional Policy Statement.</p> <p>It is recommended that for SNAs and indigenous biodiversity outside of SNAs, the wording 'restored' is added to (v) and (vi) in line with the Canterbury Regional Policy Statement (Objective 9.2.2) and the draft NPS[1]IB (Clause 3.21) which requires Local Authorities to promote the restoration of indigenous biodiversity.</p>	<p>Amend SD-O2 as follows:</p> <p><i>SD-O2 The Natural and Historic Environment</i></p> <p><i>The District's natural and historic environment is managed so that:</i></p> <p><i>i. the health and wellbeing of the community are recognised as being linked to the natural environment;</i></p> <p><i>ii. [...];</i></p> <p><i>iii. [...];</i></p> <p><i>iv. [...];</i></p> <p><i><u>x. there is an overall net gain in the quality and quantity of indigenous ecosystems and habitat, and indigenous biodiversity;</u></i></p> <p><i>v. significant indigenous vegetation and significant habitats of indigenous fauna are identified, and their values recognised, protected, and where appropriate, enhanced, <u>and, where the ecological integrity is degraded, restored;</u></i></p> <p><i><u>y. indigenous biodiversity is maintained and enhanced; with all indigenous biodiversity having improved connectivity and improved resilience.</u></i></p> <p><i>vi.-the life-supporting capacity of ecosystems and resources is safeguarded for future generations;</i></p> <p><i>vii.-[...].</i></p>
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.19	SD - Strategic Direction	Objectives	SD-O5 Mana Whenua	The submitter supports the strategic direction to recognise and provide for Kāti Huirapa and recognise their historic and contemporary relationship with the District's land, water bodies, wetlands, coastal environment and indigenous species.	Retain as notified.
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.20	EI - Energy and Infrastructure	Objectives	EI-O2 Adverse effects of Regionally Significant Infrastructure	The submitter supports avoidance of adverse effects in sensitive environments but seeks amendments to align with the draft NPS-IB in applying the effects management hierarchy for infrastructure where effects cannot be avoided due to the functional need and where there are no practicable alternative locations.	<p>Amend EI-O2 as follows:</p> <p><i>EI-O2 Adverse effects of Regionally Significant Infrastructure</i></p> <p><i>The adverse effects of Regionally Significant Infrastructure and Lifeline Utilities:</i></p> <p><i>1. are avoided in sensitive environments unless there is a functional need for the infrastructure to be in that location <u>and there are no practicable alternative locations,</u> in which case they must be <u>managed by applying the effects management hierarchy remedied or mitigated; and[...]</u></i></p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.21	EI - Energy and Infrastructure	Objectives	EI-O3 Adverse effects of other infrastructure	The Submitter supports the inclusion of this policy which seeks to avoid, remedy and mitigate adverse effects of 'other infrastructure' on sensitive environments.	Retain as notified.
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.22	EI - Energy and Infrastructure	Policies	EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure	The submitter supports the inclusion of this policy and managing adverse effects on the identified values and qualities of the natural environment and specific overlays listed. However, it is considered relevant to include consideration of the effects management hierarchy as included in the draft NPS-IB in accordance with Clause 3.10(3) and (4) for specific infrastructure that provides significant national or regional public benefit, has a functional or operation need to be in that particular location and where there are no practicable alternative locations for the new use or development.	Amend EI-P2 as follows: <i>EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure</i> <i>1. Provide for Regionally Significant Infrastructure and other infrastructure where any adverse effects are appropriately managed by:</i> <i>a. seeking to avoid adverse effects on the identified values and qualities of Outstanding Natural Landscapes and Outstanding Natural Features, Visual Amenity Landscapes, the Coastal Environment, Significant Natural Areas, High Naturalness Waterbodies Areas, Sites of Significance to Māori, historic heritage, cultural, and archaeological areas, riparian margins and notable trees <u>and applying the effects mitigation hierarchy where adverse effects cannot be avoided</u>; and</i> <i>[...].</i>
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.23	EI - Energy and Infrastructure	Rules	Note	The submitter supports the cross reference to the matters in Part 2 of the proposed Plan. It is recommended that there is a hyperlink to this chapter.	Amend the Note which precedes the Rules section, by including a hyperlink to the chapters in Part 2 - District Wide Matters.
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.24	TRAN - Transport	Objectives	TRAN-O2 Transport related effects	The submitter supports the intent of the proposed objective, policies and rules that give effect to Objective 5.2.3 and Policies 5.3.7 & 5.3.8 of the CRPS.	Retain as notified.
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.25	TRAN - Transport	Policies	TRAN-P4 New land transport infrastructure	The submitter supports the intent of the proposed objective, policies and rules that give effect to Objective 5.2.3 and Policies 5.3.7 & 5.3.8 of the CRPS.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.26	TRAN - Transport	Rules	Note	The submitter supports the note relating to other rules in the plan that are relevant to transport however it is suggested that hyperlinks are included in the note to specifically reference the relevant sections as has been done under the Energy and Infrastructure Chapter. This provides clarity to the user of the plan.	Amend the Note which precedes the Rules section, by including a hyperlink to the chapters in Part 2 - District Wide Matters.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.27	SCHED3-4 - Schedules of Historic Heritage Chapter	SCHED3 - Schedule of Historic Heritage Items	HHI-208 former musters' hut / Richmond Hut	The submitter supports the inclusion of the Richmond Hut within the schedule.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.28	SASM - Sites and Areas of Significance to Māori	General	General	The submitter supports the provisions provided in the plan to recognise and protect sites and areas of significance to Māori as well as ensure the sustainability of ecosystems that support toaka and mahika kai.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.29	ECO - Ecosystems and Indigenous Biodiversity	General	General	<p>The submitter generally opposes ECO chapter in its entirety. Considers the provisions do not provide certainty that indigenous biodiversity will be protected, maintained, enhanced, and restored for the following reasons:</p> <ol style="list-style-type: none"> 1. <i>considers the existing SNA survey is incomplete with many areas yet to be surveyed, and existing served areas may need to be re-surveyed against current criteria in the draft NPS-IB;</i> 2. <i>there are many other areas of indigenous biodiversity not identified in this chapter that are required to be maintained and enhanced;</i> 3. <i>considers it needs to be made clear in the provisions of the PDP that new subdivision, use and development within a SNA should avoid certain effects as set out in the draft NPS-IB in accordance with the effects management hierarchy, and as well as for areas outside of mapped SNAs, as set out in Clause 1.5(4) and the principles applied for biodiversity offset and compensation in Appendix 3 and 4 of the draft NPS-IB</i> 4. <i>Encourage Council to align its provisions with the exposure draft as much as possible i.e. definitions, provisions, and criteria. This recognises that the exposure draft represents the current national best-practice on managing indigenous biodiversity in the RMA context</i> 	Specific relief as outlined in the submission points.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
					[see original submission for full reasons]	
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.30	ECO - Ecosystems and Indigenous Biodiversity	Introduction	General	Considers it should be made clear within the introduction that there are unmapped areas of remnant indigenous vegetation within Timaru (both non-mapped SNAs and indigenous biodiversity that isn't covered under SNAs) that Council is also required to protect in line with the RMA (Part 2, 6(c)), the CRPS (Policy 9.3.1) and the draft NPS-IB (Policy 7 and subpart 2, Clause 3.8(5)).	Amend the Introduction to the ECO - Ecosystems and Indigenous Biodiversity Chapter as follows: <i>The District contains a diverse range of habitats that support indigenous plants and animals. Many of these are endemic, comprising forests, shrubland, herbfields, <u>drylands</u>, tussock grasslands, and waterbody margins. The Council has a responsibility to maintain 'indigenous biodiversity' generally [...].</i> <i>In addition, there are likely to be a range of other areas <u>including remnant, recovering or restored biodiversity</u> not yet assessed, but containing <u>significant</u> indigenous biodiversity values <u>that council is also required to protect, maintain and enhance</u>.</i>
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.31	ECO - Ecosystems and Indigenous Biodiversity	Objectives	ECO-O1 Protection of significant indigenous biodiversity	Whilst the submitter acknowledges that this objective is consistent with the RMA Part 2, (section 6c) it is recommended that it is replaced with an objective that sets an overall target for the District to increase indigenous biodiversity within the district and that the objective describes how this will be achieved by the Plan provisions. This aligns better with the CRPS (Objective 9.2.1, 9.2.2 and 9.2.3). The CRPS notes that there is a need for action to restore fragmented, degraded or scarce natural habitat, to restore essential ecosystem functions, ecosystems and indigenous biodiversity in particular and to extend the area of particular habitat types. Restoration is also needed to provide connections between currently isolated fragments of natural ecosystems. This submission point also links to submitters comments on SD-O2.	Delete ECO-O1 and replace with the following new objective (or similar): <u>ECO-O1 Protection of significant indigenous biodiversity</u> <u>Overall, there is an increase in indigenous biodiversity throughout the District, comprising:</u> <u>1. protected and restored SNAs; and</u> <u>2. other areas of indigenous biodiversity that are maintained and enhanced, and</u> <u>3. the restoration and enhancement of areas of indigenous biodiversity is encouraged and supported.</u>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.32	ECO - Ecosystems and Indigenous Biodiversity	Objectives	ECO-O2 Maintenance and enhancement of indigenous biodiversity	See 'Reason' provided by the submitter for submission on ECO-O1.	Delete ECO-O2 and replace with the new objective outlined in relief sought on ECO-O1.
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.33	ECO - Ecosystems and Indigenous Biodiversity	Policies	ECO-P1 Assessment and identification of significant indigenous biodiversity	<p>The submitter supports the intent of this policy but seeks to make it clear that there is a process provided in the Plan for identifying new areas of significant vegetation and habitats of indigenous fauna - this is likely to be through the resource consent process.</p> <p>This is anticipated by the provisions in the Plan as, for example, matters of discretion for the clearance of vegetation (ECO-R1-2) within sensitive areas includes identifying whether the indigenous vegetation is significant (when assessed against the criteria in APP5).</p> <p>The CRPS requires that District Councils continue to work with landowners to identify the location of significant indigenous vegetation and significant habitats of indigenous fauna for inclusion in the district plan (Policy 9.3).</p>	<p>Amend ECO-P1 as follows:</p> <p>ECO-P1 Assessment and identification of significant indigenous biodiversity</p> <p>Identify Significant Natural Areas by:</p> <ol style="list-style-type: none"> 1. assessing <i>and continuing to identify new</i> areas of indigenous vegetation and habitats of indigenous fauna according to the criteria set out in APP5-Criteria for Identifying Significant Natural Areas; and 2. [...].
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.34	ECO - Ecosystems and Indigenous Biodiversity	Policies	ECO-P2 Appropriate indigenous vegetation clearance in significant natural areas	<p>It is acknowledged that this policy provides for vegetation clearance for a limited number of activities within SNAs, however activities that have a functional need to be located within SNAs are already provided for in other chapters of the Plan (e.g. Infrastructure) and points 4 and 5 are a repeat of the reasons set out in point 2.</p> <p>There is no definition for 'unwanted organisms' and therefore this should be removed from the policy, or a definition provided of what this would include for the Timaru District to provide clarity to the user of the plan.</p>	<p>Amend ECO-P2 as follows:</p> <p>ECO-P2 Appropriate indigenous vegetation clearance in significant natural areas</p> <p>Provide for the clearance of indigenous vegetation in Significant Natural Areas where it is appropriate for health and wellbeing or customary reasons by enabling clearance:</p> <ol style="list-style-type: none"> 1. for mahika kai and other customary uses, where this is undertaken in accordance with tikaka protocols; or 2. where it is causing imminent danger to human life, structures, or utilities; or 3. where necessary to manage plant or animal pests or unwanted organisms; or 4. for flood protection works by appropriate authorities where those works are required to protect people and communities from the effects of flooding; or 5. for the operation, maintenance or repair of the National Grid and public roads. <p>OR with words to similar effect.</p>
Penny Nelson, Director-General of Conservation	166.35	ECO - Ecosystems and	Policies	ECO-P3 Protection of indigenous biodiversity in sensitive areas	The submitter considers it necessary to expand on ECO-P3 to highlight the provisions in the plan that maintain and enhance areas of indigenous vegetation and habitats of indigenous fauna that do not meet the significance criteria in SCHED 7.	<p>Delete ECO-P3 Protection of indigenous biodiversity;</p> <p>AND</p> <p>Replace with a new policy which addresses the maintenance and enhancement of indigenous vegetation and habitats of indigenous fauna that do not meet the significance criteria.</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Tumuaki Ahurei		Indigenous Biodiversity			The preferred matters to be addressed in such a policy could be such as included in the Proposed Waimakariri District Plan. [see original submission for full reasons and the example from the Waimakariri District Plan]	Matters that should be set out in the policy are: - the ongoing assessment of the current state of indigenous biodiversity within the District; - not only limiting vegetation clearance within sensitive areas but also within areas of indigenous vegetation that contain threatened, at risk or reach their national or regional distribution limits in the District or are naturally uncommon ecosystems; and - providing support and enabling the use of non-regulatory mechanisms to maintain and enhance indigenous biodiversity.
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.36	ECO - Ecosystems and Indigenous Biodiversity	Policies	ECO-P4 Protection for long-tailed bats	The submitter supports the protection provided in the plan for long-tailed bats including ECO-Policy 4. Long-tailed bats have the highest threat ranking of Nationally Critical (the same ranking as the Kākāpō and Takahē). South Canterbury supports the only known long-tailed bat population on the east coast of the South Island. The proposed overlay identifies areas of important bat habitat and provides for a level of protection from disturbance of habitat by limiting tree removal. [see original submission for full reasons]	Retain as notified.
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.37	Planning Maps	Bat Protection Area Overlay		The submitter requests that the Bat Protection Area overlay is extended to cover the areas identified on the Canterbury maps bat habitat map at Canterbury Maps Viewer.	Amend the Planning Maps to extend the Bat Protection Area Overlay to match the Canterbury maps bat habitat area.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.38	ECO - Ecosystems and Indigenous Biodiversity	Policies	ECO-P5 Protection of Significant Natural Areas	<p>Considers that the policy needs to align with the draft NPS-IB and set out the specific adverse effects on SNAs that must be avoided (NPS-IB, Clause 3.10) which applies to all SNAs.</p> <p>Also considers that it is necessary to include a policy setting out the need to protect and <u>restore</u> SNAs and other areas of significant indigenous biodiversity in line with the RMA (Part 2, Section 6(c)), CRPS (Policy 9.3.1). The draft NPS-IB (Clause 3.21) also requires Local Authorities to promote the restoration of indigenous biodiversity.</p> <p>The policy should set out the measures in the plan which seek to protect and restore SNAs which also gives effect to the suggested amendments to the objective ECO-01 and ECO-02.</p>	<p>Delete ECO-P5 and replace with the following new policy (or similar):</p> <p><u>Protect and restore SNAs and those other areas that meet the criteria set out in APP5 by:</u></p> <p><u>1. avoiding adverse effects on SNAs including:</u></p> <p><u>a. loss of ecosystem representation and extent;</u></p> <p><u>b. disruption to sequences, mosaics, or ecosystems within an SNA;</u></p> <p><u>c. fragmentation of SNAs or the loss of buffers or connection to other important habitats or ecosystems;</u></p> <p><u>d. a reduction in the function of the SNA as a buffer or connection to other important habitats or ecosystems;</u></p> <p><u>e. a reduction in the population size or occupancy of Threatened, At Risk (Declining) species that use an SNA for any part of their life cycle.</u></p> <p><u>2. avoiding the clearance of indigenous vegetation and earthworks within SNAs unless these activities:</u></p> <p><u>a. can be undertaken in a way that protects identified ecological values; and</u></p> <p><u>b. are for regionally significant infrastructure and it can be demonstrated that adverse effects are managed in accordance with EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure in accordance with the effects management hierarchy</u></p> <p><u>3. promoting the restoration and enhancement of significant indigenous vegetation and habitats; and</u></p> <p><u>4. supporting and promoting the use of covenants, reserves, management plans and community initiatives.</u></p> <p>AND</p> <p>Reorder policies within the ECO Chapter to have this proposed policy after ECO-P1.</p>
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.39	ECO - Ecosystems and Indigenous Biodiversity	Policies	ECO-P6 Avoidance of risk species	This is consistent with the CRPS which identifies the spread of plant pests being one of the principal threats to ecosystems and indigenous biodiversity in Canterbury.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.40	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R1 Clearance of indigenous vegetation (except as provided for in ECO-R2 for flood protection works or ECO-R3 for National Grid activities)	<p>Considers ECO-R1-1 provides no certainty that values within an SNA will be protected. The submitter understands small scale clearance may be required however has concerns regarding the absence of any thresholds. In line with the draft NPS-IB, the permitted activities within an SNA should occur within a much tighter threshold than outside of an SNA.</p> <p>Considers ECO-R1.1 PER-4: should define what 'unwanted organisms' could include for the Timaru District</p> <p>Considers ECO-R1-1 PER-5: should be more specific in terms of what pest plants and pest animals' removal would be permitted.</p> <p>Supports the non-complying activity status where compliance is not achieved under ECO-R1-1.</p>	<p>Amend ECO-R1.1 with the following changes:</p> <p>ECO-R1.1 Clearance of indigenous vegetation within Significant Natural Areas Overlay</p> <p>1. Include within the 'permitted activity' conditions to cover the following matters:</p> <ol style="list-style-type: none"> appropriate area thresholds applying to all permitted works in SNAs. exclusions applying to a threatened species list; and excluding clearance within sensitive ecosystems (these could be listed within a schedule or determined by using a suitably qualified ecologist) <p>AND</p> <p>2. Clarify the term 'unwanted organisms' as used in PER-4;</p> <p>AND</p> <p>3. Within PER-5 make the rule specific to what is an allowable vegetation clearance within an SNA relating to the removal of pests;</p> <p>AND</p> <p>4. Retain the non-complying activity status where compliance is not achieved;</p>
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.41	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R1 Clearance of indigenous vegetation (except as provided for in ECO-R2 for flood protection works or ECO-R3 for National Grid activities)	<p>The Submitter supports the inclusion of rules that apply to indigenous vegetation clearance in areas next to waterbodies, in the coastal environment, on steep slopes, or at an altitude of 900m or higher. However, it is considered that the rule has missed the opportunity to provide protection for the indigenous vegetation remaining on:</p> <ol style="list-style-type: none"> threatened land environments. naturally rare ecosystems; and threatened ecosystems. <p>For example, these could be found within uncultivated dryland soils, tussock grasslands, shrublands, short and tall forest remnants, herbfields and any coastal or dune environments.</p> <p>ECO-R1-2 PER-5: This could be more specific in terms of what pest plants and pest animals' removal would be permitted.</p>	<p>Amend ECO-R1.2 with the following changes:</p> <p>ECO-R1.2 Clearance of indigenous vegetation within 50m of any wetland, in the coastal environment[...]</p> <p>1. Include new rules to be consistent with the amended ECO-P3 (amendments above) to maintain and enhance indigenous biodiversity inside any ecosystems or land environments considered to be rare or threatened.</p> <p>AND</p> <p>2. List the threatened species and ecosystems for Timaru District in an attached Appendix.</p> <p>AND</p> <p>3. Amend to provide some exclusions for permitted vegetation clearance rules applying to a threatened species and ecosystem list; and excluding clearance within sensitive ecosystems (these could be listed within a schedule or determined by using a suitably qualified ecologist).</p> <p>AND</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
					<p>ECO-R1-2 Activity status where compliance not achieved: The Submitter supports the restricted discretionary status for activities that do not comply with these rules and matters of discretion however, application of the effects management hierarchy should be included in line with the draft NPS-IB (Clause 3.16). The principles for biodiversity offsetting and compensation provided within Appendix 3 and 4 of the draft NPS-IB could be referenced here to direct the user to these.</p> <p>It should also be clarified that if an area outside an already-mapped SNA is assessed as significant indigenous vegetation and significant habitat of indigenous fauna in accordance with the relevant SNA assessment criteria the adverse effects on indigenous biodiversity should be managed as if the area were an SNA.</p>	<p>4. Amend PER-5 to make the rule more specific to what is an allowable vegetation clearance within an SNA relating to the removal of pests.</p> <p>AND</p> <p>5. Amend the matters of discretion as follows:</p> <p>Matters of discretion are restricted to:</p> <p>1. whether the indigenous vegetation is significant (when assessed against the APP5 - Criteria for Identifying Significant Natural Areas) and the ability to retain any significant vegetation then the adverse effects on the indigenous biodiversity in the area shall be assessed as if the area is an SNA ; and</p> <p>x. the extent to which any adverse effect can be avoided, remedied or mitigated by applying the effects management hierarchy</p> <p>2. [...].</p> <p>[...].and</p> <p>8. any potential for mitigation or biodiversity offsetting or compensation of more than minor residual adverse effects on biodiversity values in accordance with the principles set out in Appendix 3 & 4 of the NPS-IB; and</p> <p>9. [...].</p>
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.42	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R2 Clearance of indigenous vegetation for natural hazard mitigation works	The submitter considers that this rule can be removed as it is already covered under Rule ECO-R1-2.	Delete Rule ECO-R2.
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.43	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R3 Clearance of indigenous vegetation associated with the National Grid	<p>Considers that it should be clarified that this rule only applies to the maintenance or repair of the existing National Grid and not for an extension.</p> <p>The matters of discretion should include the application of the effects management hierarchy when assessing the effects in line with the draft NPS guidance</p>	<p>Amend the rule ECO-R3 as follows:</p> <p>ECO-R3 Clearance of indigenous vegetation associated with the National Grid</p> <p>Activity status: Permitted</p> <p>Where</p> <p>PER-1</p> <p>The vegetation clearance is to provide for the operation, maintenance or repair of the National Grid (but not extension), including maintenance of existing access to National Grid support structures; and[...]</p> <p>Matters of discretion are restricted to:</p> <p>1. any adverse effects on indigenous vegetation and habitats of indigenous fauna and proposed mitigation measures and the extent to which any adverse effect can be avoided, remedied or mitigated by applying the effects management hierarchy.</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director- General of	166.44	ECO - Ecosystems and	Rules	ECO-R4 Clearance of trees in the Long-Tailed Bat Protection Area	The submitter supports ECO-R4, ECO R4 PER-1, PER-2 and Matters of Discretion the rules relating to the clearance of trees in the Long-Tailed Bat Protection Area.	None specified in relation to ECO-R4. (Note related submission on the Planning Maps (in relation to amending the Long-Tailed Bat Protection Area Overlay to align with the ECAN bat habitat map).
Conservation Tumuaki Ahurei		Indigenous Biodiversity				
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.45	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R5 Earthworks in a Significant Natural Area	The submitter supports the rules relating to earthworks in a SNA and restricted discretionary status. However, it is recommended that it is clarified that the rule does not apply to any new extension of the existing structures listed and the matters of discretion are extended to be more consistent with the draft NPS-IB and CRPS. The Activity status for where compliance is not achieved should be amended to Discretionary status.	Amend ECO-R5 as follows: ECO-R5 Earthworks in a Significant Natural Area Activity status: Restricted discretionary Where: RDIS-1 <i>The earthworks are within 2m, and for the purpose, of the maintenance, repair or replacement (but not extension) of existing lawfully established vehicle tracks, roads, walkways, firebreaks, drains, ponds, dams, waterlines, waterway crossings, or utilities.</i> Matters of discretion are restricted to: 1. any adverse effects on indigenous vegetation and habitats of indigenous fauna and the extent to which any adverse effect can be avoided, remedied or mitigated by applying the effects management hierarchy and 2. the necessity for the earthworks and any alternate options that have been considered 3. the mitigation measures proposed to ensure that the values of the SNA are maintained; and 4. any adverse effects on the mauri of the site, mahika kai, wāhi tāpu or wāhi taoka; and 5. opportunities for enhancement and restoration , of indigenous vegetation or habitats of indigenous species; and 6. [...]. [...]. Activity status where compliance not achieved: Restricted Discretionary DIS-1 [...]
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.46	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R6 Subdivision of land containing a Significant Natural Area	The submitter supports the discretionary status of the subdivision of land containing a SNA.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.47	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R7 Planting of potential pest species	<p>The submitter generally supports the proposed plant list of pest species, but considers that there are other species which should also be included given their potential for wilding spread.</p> <p>The Canterbury Regional Pest Management Plan identifies any wilding conifer as:</p> <p>Wilding conifers are any introduced conifer tree, including (but not limited to) any of the species listed in Table 3, established</p>	<p>Amend the list of pest species under ECO-R7 Planting of potential pest species to include:</p> <p><i>ECO-R7 Planting of potential pest species</i></p> <p><u><i>Wilding conifers including (but not limited to): Bishops pine, Contorta (lodgepole) pine, Corsican pine, Douglas Fir, Larch, Maritime pine, Mountain pine and dwarf mountain pine, Ponderosa Pine, Radiata Pine, Scots Pine.</i></u></p> <p>AND</p>
					by natural means, unless it is located within a forest plantation, and does not create any greater risk of wilding conifer spread to adjacent or nearby land, other than the forest plantation that it is a part of.	Include a definition for wilding conifers in line with the Canterbury Regional Pest Management Plan, which clarifies the difference between planting by natural means and use for forest plantation.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.48	APP5 - Criteria for Identifying Significant Natural Areas	General	General	The submitter supports the inclusion of criteria for identifying significant natural areas which is consistent with the CRPS. However, it is suggested that the criteria are aligned with the NPS-IB draft criteria as they are likely to become the nationally consistent criteria.	Amend the criteria included in APP5 to align with the draft NPS-IB criteria (Appendix 1).
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.49	SCHED7 - Schedule of Significant Natural Areas	SCHED7 - Schedule of Significant Natural Areas	General	The submitter supports all of the SNAs listed within SCHED7.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.50	NATC - Natural Character	General	General	For the avoidance of doubt, the NATC provisions which are not specifically addressed in the below submission points are supported for the reasons given in the s32 report.	Retain the provisions of the NATC Chapter as notified, except where specific changes are requested.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.51	NATC - Natural Character	Objectives	NATC-O1 Protection of natural character	The submitter supports the proposed objective as it is consistent with the RMA, Part 2, Section 6.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.52	NATC - Natural Character	Policies	General	The submitter supports the policies NATC-P1 to NATC-P5 in relation to recognising the riparian and aquatic ecology and biodiversity of riparian margins and encouraging the restoration of indigenous biodiversity within the riparian margins of a river. [NATC-P6 has not been specifically supported]	Retain as notified.
Penny Nelson, Director- General of Conservation	166.53	NATC - Natural Character	Rules	Note	The submitter considers that there should be a note included here that highlights to the user that there are indigenous vegetation clearance rules that also apply within riparian margins	Amend the Note to the Rules section of the NATC Chapter as follows: <i>Activities not listed in the rules of this chapter are classified as a permitted under this chapter. For certain activities, consent may be required by rules in more than one chapter in the Plan. <u>For example, rules for indigenous vegetation clearance within the river margin are found in the Ecosystems and Indigenous Biodiversity chapter (insert hyperlink)</u>, Unless expressly stated otherwise by a rule, consent is required under each of those rules. The steps plan users should take</i>
Tumuaki Ahurei						<i>to determine what rules apply to any activity, and the status of that activity, are provided in Part 1, HPW - How the Plan Works - General Approach.</i>
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.54	NATC - Natural Character	Rules	NATC-R2 Vegetation planting	The submitter supports the proposed rule which encourages indigenous vegetation planting and to restore the ecological values of the riparian margin.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.55	NATC - Natural Character	Rules	NATC-R3 Earthworks	The submitter considers that PER-2 is too lenient and should contain a limit to what can be allowed for earthworks to construct a new fence. The current rule is not consistent with point 5 of Policy NATC-P5 as the policy refers to ' <u>limited</u> new fencing and tracks'	Amend NATC-R3 Earthworks, PER-2 to include some limits for earthworks associated with new fencing along a river margin[...]
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.56	NFL - Natural Features and Landscapes	Introduction	General	The introduction provides a clear description of Outstanding Natural Landscapes and Outstanding Natural Features.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.57	NFL Natural Features and Landscapes	- Objectives	NFL-O1 Outstanding Natural Features and Outstanding Natural Landscapes	The proposed objective gives effect to Objective 12.2.1 and 12.3.2 of the CRPS.	Retain as notified.
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.58	NFL Natural Features and Landscapes	- Policies	NFL-P1 Identification of Outstanding Natural Features, Outstanding Natural Landscapes and Visual Amenity Landscapes	The proposed objective gives effect to Objective 12.2.1 and 12.3.1 of the CRPS.	Retain as notified.
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.59	NFL Natural Features and Landscapes	- Policies	NFL-P2 Enabling appropriate use and development	The proposed objective gives effect to Objective 12.2.1 and 12.3.2 of the CRPS	Retain as notified.
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.60	NFL Natural Features and Landscapes	- Policies	NFL-P4 Protecting Outstanding Natural Features and Outstanding Natural Landscapes	The proposed objective gives effect to Objective 12.2.1 and 12.3.2 of the CRPS. Make a correction to the first line of the policy.	Amend Policy NFL-P4 Protecting Outstanding Natural Features and Outstanding Natural Landscapes as follows: <i>Avoid subdivision, use and development within outstanding natural features and outstanding natural landscapes that are not provided in NFL-P2, unless it:</i> 1[...]
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.61	NFL Natural Features and Landscapes	- Rules	NFL-R1 Buildings, structures (other than fences) and irrigators and associated earthworks	The submitter supports the proposed rule framework NFL-R1.1 for earthworks in outstanding natural features. The thresholds are appropriate to manage effects and protect values.	Retain as notified.
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.62	NFL Natural Features and Landscapes	- Rules	NFL-R2 Earthworks not listed in NFL-R1, NFL-R3 or NFL-R4	The submitter supports the proposed rule framework NFL-R2.1 for earthworks in outstanding natural features. The thresholds are appropriate to manage effects and protect values.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.63	NFL Natural Features and Landscapes	- Rules	NFL-R3 Network utilities including associated earthworks	The submitter supports the proposed rule framework for earthworks in outstanding natural features. The thresholds are appropriate to manage effects and protect values.	Retain as notified.
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.64	NFL Natural Features and Landscapes	- Rules	NFL-R4 Construction of fences, including earthworks	The submitter supports the proposed rule framework for earthworks in outstanding natural features. The thresholds are appropriate to manage effects and protect values.	Retain as notified.
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.65	NFL Natural Features and Landscapes	- Rules	NFL-R5 Tree planting, other than plantation forestry	The submitter supports the proposed rule framework for earthworks in outstanding natural features. The thresholds are appropriate to manage effects and protect values.	Retain as notified.
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.66	NFL Natural Features and Landscapes	- Rules	NFL-R6 Primary production not listed in the Rules	The submitter supports the proposed rule framework for earthworks in outstanding natural features. The thresholds are appropriate to manage effects and protect values.	Retain as notified.
General of Conservation Tumuaki Ahurei				section of this chapter		
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.67	NFL Natural Features and Landscapes	- Rules	NFL-R7 Afforestation	The submitter supports the proposed rule framework for earthworks in outstanding natural features. The thresholds are appropriate to manage effects and protect values.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.68	NFL Natural Features and Landscapes	- Rules	NFL-R8 New roads, farm tracks and walking and cycling tracks	The submitter supports the proposed rule framework for earthworks in outstanding natural features. The thresholds are appropriate to manage effects and protect values.	Retain as notified.
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.69	NFL Natural Features and Landscapes	- Rules	NFL-R9 Subdivision	The submitter supports the proposed rule framework for earthworks in outstanding natural features. The thresholds are appropriate to manage effects and protect values.	Retain as notified.
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.70	NFL Natural Features and Landscapes	- Rules	NFL-R10 Mining and quarrying	The submitter supports the proposed rule framework for earthworks in outstanding natural features. The thresholds are appropriate to manage effects and protect values.	Retain as notified.
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.71	SCHED8 - Schedule of Outstanding Natural Landscapes	SCHED8 - Schedule of Outstanding Natural Landscapes	General	The proposed schedules are consistent with Policy 12.3.1 of the CRPS.	Retain as notified.
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.72	SCHED9 - Schedule of Outstanding Natural Features	SCHED9 - Schedule of Outstanding Natural Features	General	The proposed schedules are consistent with Policy 12.3.1 of the CRPS.	Retain as notified.
Tumuaki Ahurei						
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.73	Planning Maps	ONL overlay	ONL-1	Notes that a small area off Dr Sinclairs in Upper Rangitata has been missed on the planning maps (ONL-1).	Amend the Planning Maps to correct the Outstanding Natural Landscape map extent of ONL-1 to include the small area off Dr Sinclairs.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.74	PA - Public Access	Introduction	General	The proposed introduction is consistent with the RMA requirements (Part 2, Section 6(d)) and New Zealand Coastal Policy Statement (NZPS).	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.75	PA - Public Access	Objectives	PA-O1 Public access	This objective gives effect to Objective 4 and Policy 18 & 19 of the NZCPS and Policy 8.1.5 of the CRPS.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.76	PA - Public Access	Policies	PA-P1 Benefits of public access	This policy gives effect to Objective 4 and Policy 18 & 19 of the NZCPS and Policy 8.1.5 of the CRPS.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.77	PA - Public Access	Policies	PA-P2 Requirements for public access	This policy gives effect to Objective 4 and Policy 18 & 19 of the NZCPS and Policy 8.1.5 of the CRPS.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.78	PA - Public Access	Policies	PA-P4 Limiting public access	The Submitter supports the policy but recommends an additional reason for limiting public access which is consistent with the NZCPS Policy 19.	Amend PA-P4 as follows: PA-P4 Limiting public access <i>Only allow an exemption for the requirement to provide public access or limiting an existing public access, on a temporary or permanent basis, for one or more of the following reasons:</i> <i>1. in order to protect:</i> <i>a. sensitive indigenous species and their habitats; or</i>
						<i>x. dunes and estuaries and other sensitive natural areas</i> <i>b. sites and activities of cultural value to mana whenua; or</i> <i>c. [...].</i> <i>[...].</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.79	SCHED11 - Schedule of Public Access Provisions	General	General	This objective gives effect to Objective 4 and Policy 18 & 19 of the NZCPS and Policy 8.1.5 of the CRPS.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.80	SUB - Subdivision	Objectives	SUB-O1 General subdivision design	The policy should also set out the maintenance and enhancement of indigenous biodiversity outside of SNAs as required by the RMA (Part 2 (7) & Section 31) and Policy 4, 5, 8 & 13 of the draft NPS-IB which seeks to recognise the importance of maintaining and providing for indigenous biodiversity outside SNAs.	Amend SUB-O1 as follows: SUB-O1 General subdivision design <i>New subdivisions will:</i> 1. accord with the purpose, character and qualities of the zone; and 2. respond positively to the physical characteristics of the site and its context; and 3. maintain and enhances amenity values and the quality of the environment <u>including indigenous biodiversity values</u> ; 4. [...]. [...].
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.81	SUB - Subdivision	Objectives	SUB-O5 Public access and esplanade reserves and Esplanade strips	Considers this Objective gives effect to Objective 4 and Policy 18 & 19 of the NZCPS and Policy 8.1.5 of the CRPS	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.82	SUB - Subdivision	Policies	SUB-P2 Subdivision of land within sensitive environments	The submitter considers this policy is consistent with the requirements of the RMA and CRPS.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.83	SUB - Subdivision	Policies	SUB-P7 Esplanade reserves and strips	SUB-P7 and SCHED 12: This policy is consistent with the requirements of the CRPS and NZCPS Policy 18.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.84	SCHED12 - Schedule of Esplanade Provisions	General	General	SUB-P7 and SCHED 12: This policy is consistent with the requirements of the CRPS and NZCPS Policy 18.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.85	ASW - Activities on the Surface of Water	Objectives	ASW-O1 Protecting the values of the District's rivers	The submitter supports the objective which seeks to protect the values of the districts rivers, avoid adverse effects of motorised craft and manage the effects of surface water activities on fish spawning areas, habitat of breeding birds and on flora and fauna within riparian margins. The objective is consistent with the RMA Part 2, Section 6c and Section 31(1)(e).	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.86	ASW - Activities on the Surface of Water	Policies	General	The submitter supports the policies which seek to protect the values of the districts rivers, avoid adverse effects of motorised craft and manage the effects of surface water activities on fish spawning areas, habitat of breeding birds and on flora and fauna within riparian margins. The policy is consistent with the RMA Part 2, Section 6c and Section 31(1)(e).	Retain the policies of the ASW - Activities on the Surface of Water Chapter as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.87	ASW - Activities on the Surface of Water	Rules	ASW-R2 The use of motorised craft for specific environmental management or search and rescue purposes	The submitter supports the permitted activity status for the use of motorised craft for specific environmental management including the management of indigenous fish and any other flora and fauna required under the Conservation Act 1987, the Wildlife Act 1953 and the Fisheries Act 1983.	Retail ASW-R2 PER 7as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.88	ASW - Activities on the Surface of Water	Rules	ASW-R3 The recreational use of motorised craft on the Rangitata River	The submitter supports the provisions that limit the recreational use of motorised craft on specified rivers and ecosystem values at appropriate times of the year. Reference to the SCHED-Schedule of Fishing Spawning Area needs to be amended to reflect the correct schedule number.	Amend ASW-R3 as follows: ASW-R3 The recreational use of motorised craft on the Rangitata River [...] PER 3 <i>The use is not within any of the fish spawning areas identified in SCHED1413- Schedule of Fish Spawning area.</i>
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.89	ASW - Activities on the Surface of Water	Rules	ASW-R4 The recreational use of motorised craft on the Ōrāri River	The submitter supports the provisions that limit the recreational use of motorised craft on specified rivers and ecosystem values at appropriate times of the year.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.90	ASW - Activities on the Surface of Water	Rules	ASW-R5 The recreational use of motorised craft on the Ōpihi River	The submitter supports the provisions that limit the recreational use of motorised craft on specified rivers and ecosystem values at appropriate times of the year.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.91	ASW - Activities on the Surface of Water	Rules	ASW-R6 The recreational use of motorised craft on the Pureora/Pareora River	The submitter supports the provisions that limit the recreational use of motorised craft on specified rivers and ecosystem values at appropriate times of the year.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.92	ASW - Activities on the Surface of Water	Rules	ASW-R7 Other commercial activities on the surface of the District's rivers	The submitter supports the approach to make other commercial activities on the surface of the District's rivers and structures on the surface of the District's rivers Discretionary, with non-complying status for all other activities.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.93	ASW - Activities on the Surface of Water	Rules	ASW-R8 Structures on the surface of the District's rivers	The submitter supports the approach to make other commercial activities on the surface of the District's rivers and structures on the surface of the District's rivers Discretionary, with non-complying status for all other activities.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.94	ASW - Activities on the Surface of Water	Rules	ASW-R9 All other activities on the surface of the District's rivers	The submitter supports the approach to make other commercial activities on the surface of the District's rivers and structures on the surface of the District's rivers Discretionary, with non-complying status for all other activities.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.95	ASW - Activities on the Surface of Water	Rules	ASW-R10 Use of motorised craft within the fish spawning areas	The submitter supports the prohibited activity status for the use of motorised craft within the fish spawning areas.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director-	166.96	SCHED13 - Schedule of	General	General	The submitter supports the identification of areas of fish spawning for Upland Longjaw galaxias habitat (Schedule reference FSA-5-FSA-9) however it is considered necessary to	Amend SCHED13 -Schedule of Fish Spawning Areas to:
General of Conservation Tumuaki Ahurei		Fish Spawning Areas			include a larger extent within the Rangitata River. Upland Long jaw are now understood to be a highly mobile habitat seeker and extend up into the Upper Rangitata River. Additional areas are recommended to be included within the Fish Spawning areas such as estuarine habitat to preserve inanga (At Risk - declining) and Stokells smelt (At Risk-naturally uncommon) spawning, which are also important as they support riverine birdlife.	- include an extended Fish Spawning Area including the Upper Rangitata River as Upland Longjaw galaxias habitat; - consider other native fish within the Timaru District where the associated rules for surface water activities should also apply.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.97				Submission point deleted due to duplication, refer submission point 166.96.	Refer submission point 166.96.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.98	SCHED17 - Schedule of River Protection Areas	SCHED17 - Schedule of River Protection Areas	General	The submitter supports the identification of river protection areas as it relates the surface water activity rules.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.99	CE - Coastal Environment	General	General	For the avoidance of doubt, provisions which are not specifically addressed in the submission points below are supported as they align with higher order documents.	Retain as notified, except where specific changes are requested in the submission points below.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.100	CE - Coastal Environment	Objectives	CE-O3 Kāti Huirapa values	The submitter supports Objective CE-O3 and provisions as they give effect to Objective 3 and Policy 2 of the NZCPS.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director- General of Conservation	166.101	CE - Coastal Environment	Objectives	CE-O4 Coastal hazards	The Submitter supports this objective as it gives effect to Objective 5 and Policy 25 of the NZCPS to avoid increasing the risk of social, environmental and economic harm from coastal hazards.	Amend CE-O4 as follows: CE-O4 Coastal hazards <i>People, buildings and structures are protected from unacceptable risks arising from coastal hazards <u>and the effects of climate change.</u></i>
Tumuaki Ahurei					However, it is considered necessary to amend the objective to take into account the effects of climate change as required by Objective 5 of the NZCPS.	
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.102	CE - Coastal Environment	Objectives	CE-O5 Natural features and buffers	The submitter supports the intent of this objective but considers it necessary to amend the wording to make it clearer and to give effect to Objective 5 and Policy 25 & 26 of the NZCPS, in particular the discouragement of hard protection structures and the promotion of alternatives such as natural defences.	Amend CE-O5 as follows: CE-O5 Natural Features Natural Defences and buffers <i>Natural features-<u>Natural defences</u> and buffers are retained and used for coastal hazard management, in preference to natural hazard mitigation works-<u>hard engineering natural hazard mitigation</u>, wherever appropriate.</i>
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.103	CE - Coastal Environment	Policies	CE-P1 Identifying the Coastal Environment	The submitter supports this policy as it gives effect to Policy 1 of the NZCPS.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.104	Plannin g Maps	Coastal Environment Area overlay		The submitter supports the mapping of the Coastal Environment on the planning maps as it gives effect to Policy 1 of the NZCPS.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.105	CE - Coastal Environment	Policies	CE-P2 Identifying areas of high coastal natural character	The submitter supports the policy. This is consistent with Policy 13 of the NZCPS.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.106	Planning Maps	Coastal High Natural Character Areas overlay		The submitter supports the identification of areas of High Coastal Natural Character on the planning maps. This is consistent with Policy 13 of the NZCPS.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.107	SCHED14 - Schedule of attributes - qualities of coastal high natural	SCHED14 - Schedule of attributes - qualities of coastal high natural character areas	General	The submitter supports the identification of the values within SCHED 14. This is consistent with Policy 13 of the NZCPS.	Retain as notified.
		character areas				
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.108	CE - Coastal Environment	Policies	CE-P3 Identifying coastal hazards	The submitter supports this policy and the identification of coastal hazards. However, the policy needs to take into account the effects of climate change in line with the NZCPS Objective 5 and Policy 24 and the RMA Part 2, Section 7.	Amend CE-P3 as follows: CE-P3 Identifying coastal hazards <i>Identify Coastal Hazard Areas on the planning maps, and take a risk-based approach <u>taking account of climate change</u>, to the management of subdivision, use and development based on the following:[...].</i>
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.109	CE - Coastal Environment	Policies	CE-P4 Role of natural features and vegetation	The submitter supports this policy as it is consistent with the NZCPS Policy 26. However, it is considered that an amendment is needed to clarify that the wording relates to natural defences. The submitter also considers that 'protect and maintain' would also include the management of natural defences to be able to retreat due to the effects of climate change.	Amend CE-P4 as follows: CE-P4 Role of natural features and vegetation <i>Protect and maintain <u>natural defences including</u> natural topographic features and vegetation, that assist in avoiding or mitigating the risk to human life and property from coastal hazards, and where practicable restore such features and vegetation.</i>
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.110	CE - Coastal Environment	Policies	CE-P5 Coastal natural character matters	The submitter supports the policy and the identification of these areas on the planning maps and within SCHED 14 as it gives effect to Policy 13 of the NZCPS.	Retain as notified.

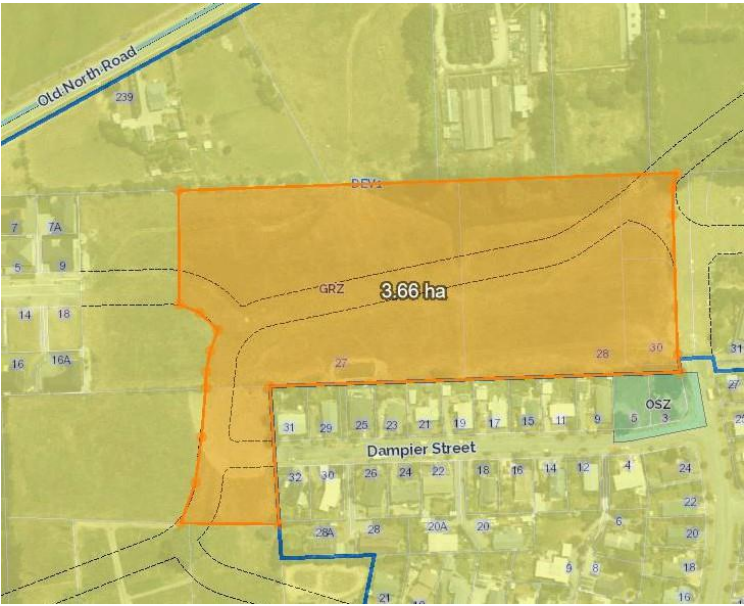
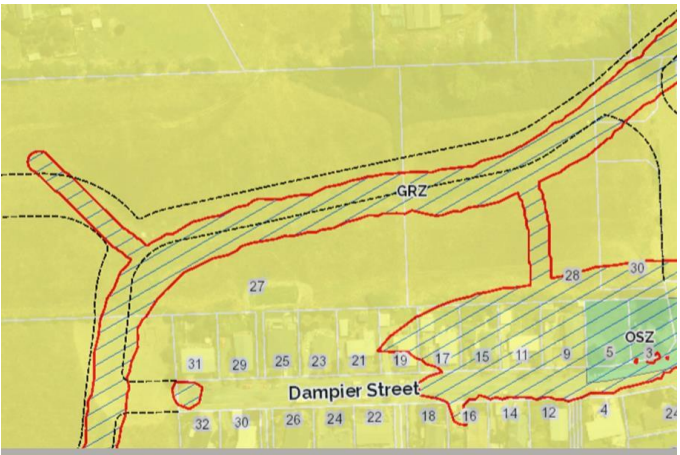
Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.111	CE - Coastal Environment	Policies	CE-P6 Kāti Huirapa values	The submitter supports Objective CE-O3 and provisions as they give effect to Objective 3 and Policy 2 of the NZCPS.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.112	CE - Coastal Environment	Policies	CE-P7 Restoration or rehabilitation of natural character	This policy gives effect to Policy 14 of the NZCPS.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.113	CE - Coastal Environment	Policies	CE-P10 Preserving the natural character of the Coastal Environment	This policy gives effect to Policy 13 of the NZCPS.	Retain as notified (except NOSZ-R2 and NOSZ-R7)
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.114	CE - Coastal Environment	Policies	CE-P11 Preserve the natural character qualities of areas with Coastal High Natural Character	The submitter supports the intent of this policy but seeks amendments to ensure that all adverse effects of activities on natural character in areas of the coastal environment with outstanding natural character are avoided. This gives effect to Policy 13 of the NZCPS and Policy 8.3.4 of the CRPS.	Amend CE-P11 as follows: <i>CE-P11 Preserve the natural character qualities of areas with Coastal High Natural Character</i> <i>Only allow subdivision, use and development in areas of Coastal High Natural Character where:</i> <i>1. for infrastructure, the development is in accordance with EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure; and</i> <i>2. for other activities:</i> <i>a. avoids significant adverse effects; and</i> <i>b. avoids, remedies or mitigates all other adverse effects on the identified natural character qualities; and</i> <i>c. <u>b.</u> demonstrates that it is appropriate by ensuring that the area of Coastal High Natural Character continues to:</i> <i>d recognise and provide for the on-going natural physical processes that have created the Coastal Environment; and</i> <i>[...].</i>


Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.115	CE - Coastal Environment	Policies	CE-P12 Coastal Hazard Areas (excluding Regional Significant Infrastructure)	The submitter supports this policy as it is consistent with the NZCPS.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.116	CE - Coastal Environment	Policies	CE-P13 Regionally Significant Infrastructure in Coastal Hazard Areas	The submitter supports this policy as it is consistent with the NZCPS but requests that it is amended to clarify that the activity does not create or exacerbate natural hazards.	Amend Policy CE-P13 as follows: CE-P13 Regionally Significant Infrastructure in Coastal Hazard Areas <i>Only allow Regionally Significant Infrastructure, including the Port of Timaru, in areas subject to coastal hazards where:</i> 1. [...]. 2. It will not create more than minor adverse <u>or exacerbate adverse</u> coastal hazard effects on adjoining or surrounding land.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.117	CE - Coastal Environment	Policies	CE-P14 Hard engineering natural hazard mitigation within the Coastal Environment	The coast is dynamic - it fluctuates about an equilibrium state over time, retreating and advancing depending on factors such as sediment supply, climate and ocean conditions. Hard protection structures are discouraged by the NZCPS because of the potential adverse effects on coastal processes. The submitter understands that hard protection structures may be the only option in some cases and CE-P4 and CE-P14 provide the appropriate policy direction to give effect to Policy 25, 26 & 27 of the NZCPS.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.118	CE - Coastal Environment	Rules	General	Thes submitter supports the provisions that are consistent with the NZCPS and CRPS and limits to manage adverse effects of activities within the Coastal Environment and Coastal High Natural Character Area Overlay.	Retain all of the rules of the CE - Coastal Environment Chapter as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.119	LIGHT - Light	Introduction	General	The submitter supports the intention to control outdoor lighting which could potentially disturb wildlife.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.120	LIGHT - Light	Objectives	LIGHT-O1 Artificial outdoor lighting	<p>The submitter supports the inclusion of the policies which seek to provide lighting that protects the identified values and qualities of light sensitive areas and to avoid adverse effects on existing light sensitive areas.</p> <p>As noted in an earlier submission (submission point 166.6 - the definition of Light Sensitive Area), it is considered that the Bat Protection Overlay should be included in the definition of light sensitive areas so that controls are included for artificial outdoor lighting within areas of bat habitat.</p>	<p>As outlined in submission on the definition of Light Sensitive Areas to Include the Long Tail Bat Protection Area Overlay;</p> <p>AND</p> <p>Any consequential amendments to LIGHT-O1.</p>
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.121	LIGHT - Light	Policies	LIGHT-P1 Appropriate artificial outdoor lighting	<p>The submitter supports the inclusion of the policies which seek to provide lighting that protects the identified values and qualities of light sensitive areas and to avoid adverse effects on existing light sensitive areas.</p> <p>As noted in an earlier submission (submission point 166.6 - the definition of Light Sensitive Area), it is considered that the Bat Protection Overlay should be included in the definition of light sensitive areas so that controls are included for artificial outdoor lighting within areas of bat habitat.</p>	<p>As outlined in submission on the definition of Light Sensitive Areas to Include the Long Tail Bat Protection Area Overlay;</p> <p>AND</p> <p>Any consequential amendments to LIGHT-P1.</p>
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.122	LIGHT - Light	Policies	LIGHT-P2 Intensity, location and direction of artificial outdoor lighting	<p>The Submitter supports the inclusion of the policies which seek to provide lighting that protects the identified values and qualities of light sensitive areas and to avoid adverse effects on existing light sensitive areas.</p> <p>As noted in an earlier submission (submission point 166.6 - the definition of Light Sensitive Area), it is considered that the Bat Protection Overlay should be included in the definition of light sensitive areas so that controls are included for artificial outdoor lighting within areas of bat habitat.</p>	<p>As outlined in submission on the definition of Light Sensitive Areas to Include the Long Tail Bat Protection Area Overlay;</p> <p>AND</p> <p>Any consequential amendments to LIGHT-P2.</p>
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.123	LIGHT - Light	Rules	General	<p>The submitter has requested the Long-Tailed Bat Protection area be included as a 'Light Sensitive Area'. As such, the rules would require amendment to mitigate adverse effects of artificial outdoor lighting on Long Tailed Bats and their habitat.</p>	<p>Amend the provisions to take into account appropriate controls to avoid adverse effects on Long Tailed Bats and their habitat (with the Long-Tailed Bat Protection Area overlay becoming listed as a 'Light Sensitive Area').</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.124	LIGHT - Light	Rules	LIGHT-R3 Outdoor artificial lighting within Light Sensitive Areas not listed in LIGHT-R2	The submitter supports R3. PER-2 and the requirement to have outdoor artificial lighting fully shielded is fully supported. However, a new rule or the current rule for sensitive light areas should be amended to consider controls for outdoor artificial lighting where there are bats present. It is recommended that the lux level controls are reviewed with an ecologist and lighting expert for areas within the Long-Tailed Bat Protection Area. Artificial lighting can adversely affect the behaviour of Long Tailed Bats reducing the area available to bats for foraging and commuting. [refer to original submission for full reasons].	Amend LIGHT-R3 or include a new rule that includes appropriate controls for artificial outdoor lighting within the Bat Protection Area addressing: <ol style="list-style-type: none"> 1. Minimising lighting: lighting only the object or area intended, lights point down (emit zero direct upward light), fully shielded and are close to the ground. 2. Using the lowest intensity lighting appropriate (i.e lux levels should be minimised as much as possible based on ecologist guidance) - Lux levels and threshold increment specified in Table 22 & 23 should be reviewed. 3. Use of lights with reduced or filtered blue, violet and UV wavelength (lights should emit little in the wavelengths below 540nm and their 'colour temperature' is a maximum of 2700K (warm white).
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.125	LIGHT - Light	Standards	LIGHT-S1 General lighting standards	The Submitter supports this rule however, as submitted above the Long-Tailed Bat Protection area should be included as a 'Light Sensitive Area'. The rules would require amendment to mitigate adverse effects of artificial outdoor lighting on Long Tailed Bats and their habitat. However, a new rule or the current rule for sensitive light areas should be amended to consider controls for outdoor artificial lighting where there are bats present. It is recommended that the lux level controls are reviewed with an ecologist and lighting expert for areas within the Long-Tailed Bat Protection Area. Artificial lighting can adversely affect the behaviour of Long Tailed Bats reducing the area available to bats for foraging and commuting. [refer to original submission for full reasons].	Amend LIGHT-S1 General lighting standards to take into account appropriate controls to avoid adverse effects on Long Tailed Bats and their habitat (with the Long-Tailed Bat Protection Area overlay becoming listed as a 'Light Sensitive Area').
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.126	GRUZ - General Rural Zone	Objectives	GRUZ-O6 Conservation activities	The submitter supports the inclusion of this objective as it provides a permitted activity for conservation activities in the general rural zone. As submitted in submission points above, it is considered necessary to include a definition of 'conservation activity'.	Retain GRUZ-O6 Conservation activities as notified; AND Include a new definition for 'conservation activity' (see submission on Definitions).
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.127	GRUZ - General Rural Zone	Policies	GRUZ-P10 Conservation activities	The Submitter supports the inclusion of this policy as it provides a permitted activity for conservation activities in the general rural zone. As submitted above, it is considered necessary to include a definition of 'conservation activity'.	Retain GRUZ-P10 Conservation activities as notified; AND Include a new definition for 'conservation activity' (see submission point on Definitions).

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Penny Nelson, Director- General of Conservation	166.128	GRUZ - General Rural Zone	Rules	GRUZ-R10 Conservation activities	The submitter supports the inclusion of this rule as it provides a permitted activity for conservation activities in the general rural zone. As submitted above, it is considered necessary to include a definition of 'conservation activity'.	Retain GRUZ-R10 Conservation activities as notified; AND Include a new definition for 'conservation activity' (see submission point on Definitions).
Tumuaki Ahurei						
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.129	GRUZ - General Rural Zone	Policies	GRUZ-P6 Mining and quarrying activities	The submitter supports the management of mining and quarrying activities and rural industries to ensure that adverse effects on sensitive environments are avoided or considered under the effects management hierarchy.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.130	GRUZ - General Rural Zone	Policies	GRUZ-P7 Industrial activities, rural industries and other activities	The submitter supports the management of mining and quarrying activities and rural industries to ensure that adverse effects on sensitive environments are avoided or considered under the effects management hierarchy.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.131	NOSZ - Natural Open Space Zone	General	General	Supports the inclusion of these objectives, policies and rules. [NOSZ-R7 has not been specifically supported].	Retain the Introduction, Objectives, Policies and Rules (except NOSZ-R7) of the NOZ-Natural Open Space Zone as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.132	PORTZ - Port Zone	Objectives	PREC7-O1 Purpose of the Port Operational Area	The submitter supports the inclusion of this objective which seek to mitigate adverse effects on sensitive environments and the coastal environment.	Retain as notified.
Penny Nelson, Director- General of Conservation Tumuaki Ahurei	166.133	PORTZ - Port Zone	Policies	PORTZ-P2 Effects of Port activities	The submitter supports the inclusion of this policy which seek to mitigate adverse effects on sensitive environments and the coastal environment.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Broughs Gully Development Limited	167.1	General	General	General	General supports the PDP as it relates to the submitter's site at 27 Dampier Street and 28 and 30 Tasman Street, Broughs Gully, Timaru. The primary relief sought is to rezone the central area of the site from GRZ to MRZ.	Rezone the central area of site from GRZ to MRZ and make any necessary consequential amendments.
Broughs Gully Development Limited	167.2	Planning Maps	Rezone		Considers the submitter's land is located close to the Showgrounds commercial centre and the MDZ provides for a sustainable urban form and greater housing choice. On this basis, request requests the rezoning of the central area of the submitters Broughs Gully site from GRZ to MRZ.	Rezone the submitters' land from GRZ to MDZ as indicated below. 
Broughs Gully Development Limited	167.3	Planning Maps	Flood Assessment Area Overlay		Considers this the Flood Assessment Overlay appears to follow the alignment of the stream in the gully which only flows intermittently. Considers stormwater management is a fundamental part of the roading design and it is considered that the overlay may give rise to unnecessary consent burden once the site is developed. Hence request the removal of the Flood Assessment Overlay over Road 1 and Road 2 on Development Plan for DEV1.	Remove Flood Assessment Area overlay from Road 1 and Road 2 of DEV1 as shown below. 
Broughs Gully Development Limited	167.4	DEV1 - Broughs Gully Residential Development Area	Plans	Figure 21 - Broughs Gully Development Area Plan	Requests the removal of the stormwater management area to the west of Road 1 on DEV-1 as the engineering design and Council has confirmed that it's not necessary.	Remove the Stormwater Management Area to the west of Road 1 on Broughs Gully Development Area Plan as indicated below.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
						<p>DEV1 - BROUGHS GULLY DEVELOPMENT AREA PLAN</p> 
Broughs Gully Development Limited	167.5	DEV1 - Broughs Gully Residential Development Area	General	General	This chapter refers to the 'Broughs Gully Residential Development Area' and the 'Broughs Gully Development Area'. The submitter requests that a single reference should be adopted.	Amend DEV1 - Broughs Gully Residential Development Area chapter to adopt a single name for the Development Area.
Broughs Gully Development Limited	167.6	DEV1 - Broughs Gully Residential Development Area	Introduction	General	<p>Requests amendments to the introduction to:</p> <ul style="list-style-type: none"> - Refer to the MRZ to reflect the rezoning request. - To refer to 'urban development' rather 'new growth area' to be consistent with the definition of the PDP. - To ensure that development not in accordance with DEV1 doesn't necessarily have to be better to achieve the outcomes of the DEV1. 	<p>Amend DEV1 as follows:</p> <p>DEV1 - Broughs Gully Residential Development Area</p> <p><i>The Broughs Gully Development Area comprises 27ha of land situated in north Timaru bordered by Jellicoe Street, Old North Road and Mahoneys Hill Road. The land within the Development Area is zoned General Residential Zone <u>and Medium Density Residential Zone</u>. The Broughs Gully Development Area Plan guides the general pattern of <u>urban</u> development for new growth in the area. It provides for the integration of future suburban development with roads, sewer and water infrastructure, stormwater basins and linkages to the surrounding area. It also restricts <u>vehicle</u> access area onto to Old North Road.</i></p> <p><i>It is anticipated that <u>urban</u> development will be in general accordance with the Broughs Gully Development Area Plan. However, it is <u>also</u> recognised that through the detailed preparation of a subdivision consent application(s) or infrastructure <u>asset</u> design, there is the potential for alternative solutions <u>may to</u> be developed that <u>also better</u> achieve <u>the objective of the Broughs Gully Development Area</u>. specific outcomes sought than the land use pattern shown on the Broughs Gully Development Area Plan.</i></p> <p><i>When assessing aAny resource consent applications for development that is not in <u>general</u> accordance with the Broughs Gully Development Area Plan, it is anticipated that such applications will only be granted where they are able to shall demonstrate that the proposed <u>urban</u> development <u>better</u> achieves the objectives identified in this chapter and specific outcomes sought in of the Broughs Gully Development Area Plan. This will be easier to demonstrate if the proposed development encompasses the entire development area so that the implications of the changes can be fully understood. Conversely, Where the proposed <u>urban</u> development is only for a portion</i></p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
						<p>of the <u>Broughs Gully</u> Development Area, the <u>application</u> will need to demonstrate that the outcomes sought for the entire <u>Broughs Gully</u> Development Area will not be compromised or constrained.</p> <p><u>Any resource consent application that is not in in general accordance with the Broughs Gully Development Area Plan, Any new design will need to shall align with the design qualities principles of the New Zealand Urban Design Protocol, or its successor.</u></p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Broughs Gully Development Limited	167.7	DEV1 - Broughs Gully Residential Development Area	Objectives	DEV1-O1 Key Outcomes for the Development Area	As a consequential change to the rezone request, request amendments to DEV1-O1 to incorporate the reference to MRZ, and to streamline the wording and ensure the reference to 'urban development' is used to align with the definition in the PDP.	Amend DEV1-O1 as follows: DEV1-O1 Key Outcomes for the Development <u>Urban</u> development occurs in the Broughs Gully Development Area in a comprehensive manner that ensures: 1. efficient provision of suburban residential <u>urban</u> development that provides a range of allotment sizes; and 2. residential <u>urban</u> development is integrated and coordinated with infrastructure; and 3. infrastructure is provided in an effective and efficient manner; and 4. road and pedestrian network is efficient, connected and safe; and 5. the character and qualities of the General Residential Zone <u>and Medium Density Residential Zone</u> are met; and 6. the design integrates with the areas topography and natural drainage channels; and 7. adverse effects of natural hazards are avoided or mitigated; and 8. the ability to develop any remaining area is not compromised or constrained by new <u>urban</u> development; and 9. new <u>urban</u> development integrates well with <u>surrounding urban environment adjoining urban land uses</u> ; and 10. stormwater has a minimal effect on Waitarakao (Washdyke lagoon); and 11. there is minimal adverse effect on the national grid.
Broughs Gully Development Limited	167.8	DEV1 - Broughs Gully Residential Development Area	Policies	DEV1-P1 Anticipated Activities	Requests replacing 'complies' in DEV-P1 with 'in general accordance with' given the plan is at such a course level and that compliance may be difficult to determine. Amendments are also sought to delete 'associated requirements' as its unclear, and to insert 'urban' before 'development' to align with the definition in the PDP.	Amend DEV1-P1 as follows: DEV1-P1 Anticipated Activities Enable <u>urban</u> development that is <u>in general accordance</u> complies with the Broughs Gully Development Area Plan and any associated requirements .
Broughs Gully Development Limited	167.9	DEV1 - Broughs Gully Residential Development Area	Policies	DEV1-P2 Unanticipated Activities Only	Requests replacing 'complies' in DEV-P2 with 'in general accordance with' given the plan is at such a course level and that compliance may be difficult to determine. Amendments are also sought to insert 'urban' before 'development' to align with the definition in the PDP.	Amend DEV1-P2 as follows: DEV1-P2 Unanticipated Activities Only Only Allow <u>urban development that is not in general accordance activities that do not comply</u> with Broughs Gully Development Area Plan and associated requirements if an alternative design provides a better solution to meeting if it achieves the outcomes in Objective <u>DEV1-O1</u> .

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Brouchs Gully Development Limited	167.10	DEV1 - Brouchs Gully Residential Development Area	Rules	DEV1-R1 Land use, subdivision and development	Requests replacing 'complies' in DEV-R1.PER1 with 'in general accordance with' given the plan is at such a course level and that compliance may be difficult to determine.	Amend DEV1-R1 as follows: DEV1-R1 Land use, subdivision and development Activity status: Permitted Where: PER-1 It is in general accordance complies with Brouchs Gully Development Area Plan; and [...]
Brouchs Gully Development Limited	167.11	DEV1 - Brouchs Gully Residential Development Area	Standards	DEV1-S1 Roading	Considers that roading design can be undertaken by a suitably qualified professional engineer. This person does not necessarily need to be chartered.	Amend DEV1-S1 as follows: DEV1-S1 Roading [...] Note: 1. The Council will require specific designs for roads in accordance with Council's infrastructure Standards. This is to be completed by a suitably qualified chartered professional engineer and these engineering plans and specifications will require Timaru District Council approval prior to the commencement of any work. 2. Quality control during construction shall also be documented to check compliance with the relevant engineering design.
Brouchs Gully Development Limited	167.12	DEV1 - Brouchs Gully Residential Development Area	Standards	DEV1-S2 Stormwater, water and sewerage infrastructure	Considers that infrastructure design can be undertaken by a suitably qualified professional engineer. This person does not necessarily need to be chartered.	Amend DEV1-S2 as follows: DEV1-S2 Stormwater, water and sewerage Note: 1. The Council will require specific designs for roads in accordance with Council's infrastructure Standards. This is to be completed by a suitably qualified chartered professional engineer and these engineering plans and specifications will require Timaru District Council approval prior to the commencement of any work. 2. Quality control during construction shall also be documented to check compliance with the relevant engineering design.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Broughs Gully Development Limited	167.13	DEV1 - Broughs Gully Residential Development Area	Standards	DEV1-S3 Walkway/cycleways	Considers the development of walk/cycleways in DEV1-S1 should be limited to within 'their land'.	Amend DEV1-S3 as follows: DEV1-S3 Walkway/cycleways <i>At the time of land use, subdivision or development and prior to any new buildings being occupied, the developer shall design and construct all walkway/cycleways <u>on their land</u> indicated on the Broughs Gully Development Area Plan to include:</i> <i>1. a minimum reserve width of 6 metres;</i> <i>2. a minimum formed width of 2.5 metres;</i> <i>3. planting and mulching of the remaining 3.5 metres;</i> <i>4. for the formed width, 200mm (depth) of compacted AP65 must be provided, after vegetation and topsoil is removed. A 100mm layer of compacted AP20 is then to be applied and topped with 25mm of crusher dust.</i>
						<i>5. for the unformed width, a planting plan incorporating appropriate native plants and 100mm depth of bark mulch is to be submitted to Council for approval prior to planting.</i>
Broughs Gully Development Limited	167.14	DEV1 - Broughs Gully Residential Development Area	Standards	DEV1-S4 Parks	Supports DEV-S4 but notes that DEV1 does not indicate the location of parks, but it is understood that these may be incorporated in stormwater management areas in the future.	Retain as notified.
Broughs Gully Development Limited	167.15	DEV1 - Broughs Gully Residential Development Area	Standards	DEV1-S5 Vesting of infrastructure and assets	Requests the replacement of 'public utility' with 'network utility' to align with the definition in the PDP.	Amend DEV1-S5 as follows: DEV1-S5 Vesting of infrastructure and assets <i>At the time of land use, subdivision or development and prior to any new buildings being occupied, all required roads, <u>network utility</u> public utility services, parks, walkway/cycleways and stormwater swales indicated on the Broughs Gully Development Area Plan and within the site shall be vested into Timaru District Council's ownership.</i> <i>Note:</i> <i>1. The actual cost of road, <u>network</u> utility services and walkway/cycleway construction will be apportioned between the developer and Council, with that apportionment to be determined on the basis of the percentage of public versus private benefit.</i>
Broughs Gully Development Limited	167.16	SUB - Subdivision	Policies	SUB-P13 Development Area Plans	Requests replacing 'complies' in SUB-P3 with 'in general accordance with' given the plan is at such a course level and that compliance may be difficult to determine. A design, that is not in general accordance with a Development Area Plan, shall achieve the outcomes listed in Objectives for that Development Area – it doesn't necessarily need to 'better achieve' these.	Amend SUB-P13 Development Area Plans as follows: SUB-P13 Development Area Plans <i>Require subdivisions to be <u>in general accordance</u> comply with the relevant Development Area Plan, unless it can be demonstrated that an alternative proposal can better achieve the objectives of the Development Area Plan.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Broughs Gully Development Limited	167.17	SUB - Subdivision	Standards	SUB-S1 Allotment sizes and dimensions	Considers the minimum lot size exemption provided SUB-S1.2.4 should also be extended to maximum allotment size, to provide, for example, multi-unit developments. Also considers that there may be instances where a proposed dwelling does not require a land use consent, however this scenario is not exempt under exemption b.	Amend SUB-S1 as follows: SUB-S1 Allotment sizes and dimensions [...] 2 Medium Density Residential Zone 1. Allotments must have a minimum net site area of 300m ² in area; and 2. no more than one allotment that is more than 500m ² in net site area; and 3. allotments must have a dimensions that can accommodate a circle with a minimum 13m diameter, clear of any vehicle access, surface water body or boundary setback. Except that 4. no minimum <u>or maximum</u> net site area or dimension applies to allotments created: a. around existing residential unit; or b. a proposed residential unit is part of a combined land use and subdivision consent application, <u>or does not require a land use consent.</u> 3. General Rural Zone [...]
Broughs Gully Development Limited	167.18	GRZ - General Residential Zone	Objectives	GRZ-O1 The purpose of the General Residential Zone	Considers GRZ-O1 is appropriate.	Retain as notified.
Broughs Gully Development Limited	167.19	GRZ - General Residential Zone	Objectives	GRZ-O2 Character and qualities of the General Residential Zone	Considers GRZ-O2 is appropriate.	Retain as notified.
Broughs Gully Development Limited	167.20	GRZ - General Residential Zone	Policies	GRZ-P1 Residential activities	Supports GRZ-P1 but notes clause 2(a) refers to “assessable” which is presumed to be “accessible” and therefore requests an amendment.	Amend GRZ-P1 as follows: GRZ-P1 Residential activities Enable residential activities and a wide range of residential unit types and sizes where: 1. they are compatible with the character and qualities of the General Residential Zone; and 2. outdoor living areas: a. are directly <u>accessible assessable</u> from the residential unit and have access to sunlight; and [...]


Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Broughs Gully Development Limited	167.21	GRZ - General Residential Zone	Rules	GRZ-R1 Residential activity (not including buildings and not otherwise listed in this chapter)	Considers GRZ-R1 is appropriate.	Retain as notified.
Broughs Gully Development Limited	167.22	GRZ - General Residential Zone	Rules	GRZ-R2 Residential unit	Considers GRZ-R2 is appropriate.	Retain as notified.
Broughs Gully Development Limited	167.23	GRZ - General Residential Zone	Rules	GRZ-R9 Buildings and structures	Considers GRZ-R9 is appropriate.	Retain as notified.
Broughs Gully Development Limited	167.24	GRZ - General Residential Zone	Standards	GRZ-S1 Height of buildings and structures	Considers GRZ-S1 is appropriate.	Retain as notified.
Broughs Gully Development Limited	167.25	GRZ - General Residential Zone	Standards	GRZ-S2 Height in relation to boundary	Considers GRZ-S2 is appropriate.	Retain as notified.
Broughs Gully Development Limited	167.26	GRZ - General Residential Zone	Standards	GRZ-S3 Road setback	Considers GRZ-S3 is appropriate.	Retain as notified.
Broughs Gully Development Limited	167.27	GRZ - General Residential Zone	Standards	GRZ-S4 Façade length General Residential Zone	Considers GRZ-S4 is appropriate.	Retain as notified.
Broughs Gully Development Limited	167.28	GRZ - General Residential Zone	Standards	GRZ-S5 Coverage	Considers GRZ-S5 is appropriate.	Retain as notified.
Broughs Gully Development Limited	167.29	GRZ - General Residential Zone	Standards	GRZ-S6 Gross floor area	Considers GRZ-S6 is appropriate.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Brouchs Gully Development Limited	167.30	GRZ - General Residential Zone	Standards	GRZ-S8 Outdoor living space	Considers GRZ-S8 is appropriate.	Retain as notified.
Brouchs Gully Development Limited	167.31	GRZ - General Residential Zone	Standards	GRZ-S9 Landscaping	Considers GRZ-S9 is appropriate.	Retain as notified.
Brouchs Gully Development Limited	167.32	MRZ - Medium Density Residential Zone	Objectives	MRZ-O1 Purpose of the Medium Density Residential Zone	Considers MRZ-O1 is appropriate.	Retain as notified.
Brouchs Gully Development Limited	167.33	MRZ - Medium Density Residential Zone	Objectives	MRZ-O2 Character and qualities of the Medium Density Residential Zone	Considers MRZ-O2 is appropriate.	Retain as notified.
Brouchs Gully Development Limited	167.34	MRZ - Medium Density Residential Zone	Policies	MRZ-P1 Medium density residential development	Considers MRZ-P1 is appropriate.	Retain as notified.
Brouchs Gully Development Limited	167.35	MRZ - Medium Density Residential Zone	Policies	MRZ-P2 Streetscapes	Considers MRZ-P2 is appropriate.	Retain as notified.
		Residential Zone				
Brouchs Gully Development Limited	167.36	MRZ - Medium Density Residential Zone	Policies	MRZ-P3 Innovative approaches	Considers MRZ-P3 is appropriate.	Retain as notified
Brouchs Gully Development Limited	167.37	MRZ - Medium Density Residential Zone	Policies	MRZ-P6 Other non-residential activities	Notes MRZ-P6 refers to the GRZ, when it is presumed to reference should be to MRZ.	Amend MRZ-P6 by changing reference from GRZ to MRZ .

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Brouchs Gully Development Limited	167.38	MRZ - Medium Density Residential Zone	Policies	MRZ-P7 Industrial and large format retail	Policy MRZ-P7 refers to the GRZ, when it is presumed the reference should be to MRZ.	Amend MRZ-P7 by changing reference from GRZ to MRZ .
Brouchs Gully Development Limited	167.39	MRZ - Medium Density Residential Zone	Rules	MRZ-R1 Residential activity (not otherwise listed in this chapter)	Considers Rule MRZ-R1 is appropriate.	Retain as notified.
Brouchs Gully Development Limited	167.40	MRZ - Medium Density Residential Zone	Rules	MRZ-R2 Residential units	Considers MRZ-R2 is appropriate.	Retain as notified.
Brouchs Gully Development Limited	167.41	MRZ - Medium Density Residential Zone	Rules	MRZ-R9 Buildings and structures (excluding fences)	Considers MRZ-R9 is appropriate.	Retain as notified.
Brouchs Gully Development Limited	167.42	MRZ - Medium Density Residential Zone	Standards	MRZ-S1 Height of buildings and structures	Considers MRZ-S1 is appropriate.	Retain as notified.
Brouchs Gully Development Limited	167.43	MRZ - Medium Density Residential Zone	Standards	MRZ-S2 Height in relation to boundary	Considers MRZ-S2 is appropriate.	Retain as notified.
Brouchs Gully Development Limited	167.44	MRZ - Medium Density Residential Zone	Standards	MRZ-S3 Outdoor living space	Considers MRZ-S3 is appropriate.	Retain as notified.
Brouchs Gully Development Limited	167.45	MRZ - Medium Density Residential Zone	Standards	MRZ-S4 Service and storage spaces	Considers MRZ-S4 is appropriate.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Brouchs Gully Development Limited	167.46	MRZ - Medium Density Residential Zone	Standards	MRZ-S5 Building coverage Medium Density Residential Zone	Considers MRZ-S5 is appropriate.	Retain as notified.
Brouchs Gully Development Limited	167.47	MRZ - Medium Density Residential Zone	Standards	MRZ-R9 Buildings and structures (excluding fences)	Considers MRZ-S6 is appropriate.	Retain as notified.
Brouchs Gully Development Limited	167.48	SASM - Sites and Areas of Significance to Māori	Rules	SASM-R1 Earthworks not including quarrying and mining	The submitter's land is covered by in SASM3 (Wahi Tupuna Overlay). Considers that SASM-R1.1.PER-2 appropriately provides for accidental discoveries and therefore PER-1 can be deleted. If PER-1 is retained, the reference to 'utilities' in Matter of Discretion 10 be replaced with a reference to 'network utility' to align with definition in the PDP.	<p>Amend SASM-R1 by either:</p> <p>1. Deleting PER1 in its entirety as follows:</p> <p>SASM-R1 Earthworks not including quarrying and mining</p> <p>1. Wahi Tupuna Overlay</p> <p><i>Note: for earthworks associated with quarrying and mining, see SASM-R5</i></p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1</p> <p><i>The activity is either:</i></p> <p><i>1. earthworks, including those associated with and under new buildings/structures and those necessary for the installation of infrastructure / utilities, do not exceed a maximum area of 750m²; or</i></p> <p><i>2. earthworks for the purpose of maintaining existing roads, tracks, or natural hazard mitigation works, and are within the footprint or modified ground comprised by the existing road, track or natural hazard mitigation works; and</i></p> <p>PER-2PER-1</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
						<p>The Accidental Discovery Protocol commitment form, contained within APP4 - Form confirming a commitment to adhering to an Accidental Discovery Protocol, has been completed and submitted to Council, at least 2 weeks prior to the commencement of any earthworks.</p> <p>[...]</p> <p>OR</p> <p>2. If PER-1 is retained, amend Matter of Discretion as follows:</p> <p>Activity status when compliance not achieved: Restricted Discretionary</p> <p>Matters of discretion are restricted to:</p> <p>1. whether Te Rūnanga o Arowhenua has been consulted, the outcome of that consultation, and the extent to which the proposal responds to, or incorporates the outcomes of that consultation; and</p> <p>[...]</p> <p>10 in respect of a <u>network utility utilities</u>, the extent to which the <u>network utility proposed utility</u> has functional needs for its location.</p>
Broughs Gully Development Limited	167.49	SCHED1 - Schedule of Roading Hierarchy	Collector Roads	Lancewood Terrace, Timaru Full length	SCHED1 identifies Lancewood Terrace as a 'collector road'. It is unclear whether 'Road 1', which is essentially an extension to Lancewood Terrace will also be a 'collector road' - if so SCHED1 should be updated to reflect this. The submitter requests an amendment.	Clarify if Road 1 will be classified as a collector road.
Hilton Haulage Limited Partnership	168.1	SD - Strategic Direction	Objectives	SD-O6 Business Areas and Activities	Considers that SD-O6 is appropriate.	Retain as notified.
Hilton Haulage Limited Partnership	168.2	Planning Maps	Major Hazard Facilities overlay	SHF-16	Requests to amend SHF-16 so it only covers the 1.56ha Southern Proteins site recently created through a subdivision instead of the whole existing 12 ha parent site. SHF-16 relates to Southern Proteins Limited which recently gained land use consent (102.2022.249.1) to operate a facility on a 1.56ha site at the western end of 6 Milward Street.	Amend Major Hazard Facilities SHF-16 to ensure it only covers the Southern Proteins site as per following image.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
						
Hilton Haulage Limited Partnership	168.3	SASM - Sites and Areas of Significance to Māori	Rules	SASM-R1 Earthworks not including quarrying and mining	Opposes SASM-R1 PER-1 on the basis that considers PER-2 addresses the accidental discovery of archaeology.	Delete SASM-R1.PER-1 .
Hilton Haulage Limited Partnership	168.4	RELO - Relocated Buildings and Shipping Containers	Policies	RELO-P1 Relocated buildings and shipping containers in General Industrial Zone	Considers RELO-P1 is appropriate.	Retain as notified.
Hilton Haulage Limited Partnership	168.5	RELO - Relocated Buildings and Shipping Containers	Rules	RELO-R1 Placement of a relocated building	Considers RELO-R1 is appropriate.	Retain as notified.
Hilton Haulage Limited Partnership	168.6	RELO - Relocated Buildings and Shipping Containers	Rules	RELO-R2 Placement of a shipping container	Consider RELO-R2 is appropriate.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary									
Hilton Haulage Limited Partnership	168.7	CE - Coastal Environment	Policies	CE-P12 Coastal Hazard Areas (excluding Regional Significant Infrastructure)	Requests to amend CE-P12 as the use of “avoid” in Clause 2 sets a high threshold and the term “increase” is not quantified. Potentially, no new buildings could establish in the Sea Inundation Overlay in accordance with this policy.	Amend CE-P12 as follows. CE-P12 Coastal Hazard Areas (excluding Regional Significant Infrastructure) 1. In non-urban areas, avoid subdivision, use and development within the Coastal Erosion Overlay and Sea Water Inundation Overlay where there is a new or increased risk of loss of life, or significant damage to structures or property; 2. Within existing urban areas, manage avoid-increasing the risk of social, economic, or environmental harm from coastal natural hazards.									
Hilton Haulage Limited Partnership	168.8	CE - Coastal Environment	Rules	CE-R4 Buildings and structures and extensions (excluding Regionally Significant Infrastructure and fences)	Considers in the context of the Washdyke industrial area, it is appropriate that buildings are provided for in the Sea Water Inundation Overlay (CE-R4.4).	Retain CE-R4.4 as notified.									
Hilton Haulage Limited Partnership	168.9	NOISE - Noise	Standards	Table 24 - Noise Performance Standards	Considers the GIZ should be for the noisiest activities and noise limits are only appropriate along the zone boundary, hence request reference to GIZ be removed from the table.	Amend reference to the General Industrial Zone within Table 24.3 as follows: <table border="1"> <thead> <tr> <th>Receiving zone and assessment location</th> <th>Receiving zone and assessment location</th> <th>Receiving zone and assessment location</th> </tr> </thead> <tbody> <tr> <td>3.</td> <td>7.00am - 10.00pm</td> <td>65 dB L_{Aeq} (15 min)</td> </tr> <tr> <td>Within any part of a site in the following zones: a. Large Format Retail Zone b. Town Centre Zone c. City Centre Zone d. General Industrial Zone, excluding those sites located to the east of the Main South Railway Line and forming part of, or adjoining the Port of Timaru.</td> <td>10.00pm - 7.00am</td> <td>65 dB L_{Aeq} (15 min) 75 dB L_{AFmax}</td> </tr> </tbody> </table>	Receiving zone and assessment location	Receiving zone and assessment location	Receiving zone and assessment location	3.	7.00am - 10.00pm	65 dB L _{Aeq} (15 min)	Within any part of a site in the following zones: a. Large Format Retail Zone b. Town Centre Zone c. City Centre Zone d. General Industrial Zone, excluding those sites located to the east of the Main South Railway Line and forming part of, or adjoining the Port of Timaru.	10.00pm - 7.00am	65 dB L _{Aeq} (15 min) 75 dB L _{AFmax}
Receiving zone and assessment location	Receiving zone and assessment location	Receiving zone and assessment location													
3.	7.00am - 10.00pm	65 dB L _{Aeq} (15 min)													
Within any part of a site in the following zones: a. Large Format Retail Zone b. Town Centre Zone c. City Centre Zone d. General Industrial Zone, excluding those sites located to the east of the Main South Railway Line and forming part of, or adjoining the Port of Timaru.	10.00pm - 7.00am	65 dB L _{Aeq} (15 min) 75 dB L _{AFmax}													
Hilton Haulage Limited Partnership	168.10	GIZ - General Industrial Zone	Objectives	GIZ-O1 The purpose of the General Industrial Zone	Considers GIZ-O1 is appropriate.	Retain as notified.									

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Hilton Haulage Limited Partnership	168.11	GIZ - General Industrial Zone	Objectives	GIZ-O2 Character and qualities of the General Industrial Zone	Requests to amend GIZ-O2(7) that seeks buildings and activities 'do not compromise' the amenity of adjoining Residential and Open Space and Recreation Zones. This is considered an onerous threshold for the GIZ. It is suggested that the term 'maintain', is more appropriate. This would align with GIZ-O4(3).	Amend GIZ-O2 as follows: <i>GIZ-O2 Character and qualities of the General Industrial Zone</i> <i>The character and qualities of the General Industrial Zone comprise:</i> [...] <i>7. buildings and activities that do not compromise maintain the amenity of adjoining Residential and Open Space and Recreation Zones; and</i> [...]
Hilton Haulage Limited Partnership	168.12	GIZ - General Industrial Zone	Objectives	GIZ-O3 Use and development in the General Industrial Zone	Considers GIZ-O3 is appropriate.	Retain as notified.
Hilton Haulage Limited Partnership	168.13	GIZ - General Industrial Zone	Objectives	PREC3-O1 Washdyke industrial expansion precinct	Considers PREC3-O1 is appropriate.	Retain as notified
Hilton Haulage Limited Partnership	168.14	GIZ - General Industrial Zone	Policies	GIZ-P1 Industrial activities	Considers GIZ-P1 is appropriate.	Retain as notified.
Hilton Haulage Limited Partnership	168.15	GIZ - General Industrial Zone	Policies	GIZ-P3 Streetscape and amenity values	Considers GIZ-P3 is appropriate.	Retain as notified.
Hilton Haulage Limited Partnership	168.16	GIZ - General Industrial Zone	Policies	GIZ-P4 Industrial and trade waste connections	Considers GIZ-P4 is appropriate.	Retain as notified.
Hilton Haulage Limited Partnership	168.17	GIZ - General Industrial Zone	Policies	GIZ-P6 Other activities	Considers GIZ-P6 is appropriate.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Hilton Haulage Limited Partnership	168.18	GIZ - General Industrial Zone	Rules	GIZ-R1 Industrial activity Trade supplier Laboratories Service stations Motor garage Emergency services facilities Veterinary clinics Excluding any industrial ancillary activity and offensive trades	Requests to amend GIZ-R1 to delete the exclusion of industrial ancillary activity as its at odds with the definition of "Industrial Activity" that includes any ancillary activity. It is also proposed to combine GIZ-R1 with GIZ-R2, to streamline the rule framework. It is suggested that PER-2 should target those activities that require a new trade waste connection and should not apply to sites that already have an existing connection.	Amend GIZ-R1 as follows: GIZ-R1 - Industrial activity, Trade supplier, Laboratories, Service stations, Motor garage, Emergency services facilities, Veterinary clinics, excluding any industrial ancillary activity and offensive trades. Note: Industrial ancillary activity is provided in GIZ-R2 Offensive trades are provided in GIZ-R4 Activity status: Permitted Where: PER-1 -The activity and its buildings and structures (excluding fences) are located more than 50 metres from any Residential Zones or Rural Lifestyle Zone; and PER-2 - <u>If the activity does not requires a new industrial and trade waste connection, and a trade waste connection is available;</u> and PER-3 -The activity and its buildings and structures, complies with all the Standards of this chapter-; <u>and</u> PER-4 - <u>Any ancillary activity does not include a residential activity; and</u> PER-5 - <u>Any ancillary activity(s):</u> <u>1. are located on the same site of the primary industrial activity; and</u> <u>2. has a maximum combined gross floor area of 15% of the primary industrial buildings on the site.</u>
Hilton Haulage Limited Partnership	168.19	GIZ - General Industrial Zone	Rules	GIZ-R2 Industrial ancillary activities	Submitter proposes to combine GIZ-R1 with GIZ-R2, to streamline the rule framework for the reasons outlined in 168.18.	Delete GIZ-R2 and amend GIZ-R1 as requested above.
Hilton Haulage Limited Partnership	168.20	GIZ - General Industrial Zone	Standards	GIZ-S1 Height in relation to boundary	Considers GIZ-S1 is appropriate.	Retain as notified.
Hilton Haulage Limited Partnership	168.21	GIZ - General Industrial Zone	Standards	GIZ-S2 Maximum height of buildings and structures	Considers GIZ-S2 is appropriate, in particular the 35m height limit in the Height Control Area.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Hilton Haulage Limited Partnership	168.22	GIZ - General Industrial Zone	Standards	GIZ-S3 Setbacks of buildings and structures excluding fences	Requests to amend GIZ-S3 to reduce the building/structure setback to 3m to be consistent with GIZ-S6. Considers that 3m will provide the screening and amenity anticipated.	Amend GIZ-S3 as follows: GIZ-S3 Setbacks of buildings and structures 1. General Industrial 1. Any building or structure must be setback a minimum of 5 3 m from any road boundary; and 2. Any building or structures must be setback a minimum of 3m from any boundary with a Residential Zone, Rural Zone or Open Space and Recreation Zone. [...]
Hilton Haulage Limited Partnership	168.23	GIZ - General Industrial Zone	Standards	GIZ-S6 Landscaping and bund(s)	Supports GIZ-S6 but requests to amend clause 4 to allow planting to occur in the following planting season.	Amend GIZ-S6 as follows: GIZ-S6 Landscaping and bund(s) 1. General Industrial Zone [...] 4. The landscaping strip must be permanently maintained and if any plants die or become diseased, the must be replaced in the next planting season immediately . [...]
Hilton Haulage Limited Partnership	168.24	EI - Energy and Infrastructure	Rules Section G - Flight Paths Protection for Richard Pearse Airport (Timaru Airport)	EI-R39 Buildings, structures or trees with the Aerodrome Flight Paths Protection Area Overlay	Supports the safe operation of aircraft. Requests clarity as to whether the height limit in the Aerodrome Flight Protection Path applies to the land within the horizontal and conical surfaces (or just the runway approaches).	1. Amend EI-R39 by inserting detail of the certification process at PER-1, potentially via a note. AND 2. Clarify if the height limits noted for the Aerodrome Flight Protection Path apply to land within the horizontal and conical surfaces.
Hilton Haulage Limited Partnership	168.25	NH - Natural Hazards	Rules	NH-R4 Natural hazard sensitive activities or structures and additions to such activities or structures with a ground floor area of 30M ² or more	Supports the rule as it provides a pathway to permit natural hazard sensitive activities that are subject to flooding, including by way of minimum finished floor level requirements.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Hilton Haulage Limited Partnership	168.26	NH - Natural Hazards	Standards	NH-S2 Volume of earthworks	Considers it is unclear if the limits apply per site, project or zone and to exclude earthworks to achieve the required minimum floor levels.	Amend NH-S2 as follows: NH-S2 Volume of earthworks 1. Flood Assessment Areas Overlay The earthworks do not exceed: <ul style="list-style-type: none"> • 2,000m² in area in any calendar year in a Rural zone <u>site</u>; and • 250m² in area in any calendar year in any <u>site within any</u> other zone. <p><u>Except for earthworks necessary to achieve minimum floor levels specified in a Flood Risk Certificate in Rule NH-S1.</u></p> <p>[...]</p>
Hilton Haulage Limited Partnership	168.27	DEV3 - Washdyke Industrial Development Area	General	General	Considers the inconsistent references to the name of the Washdyke Industrial Development Area are addressed by referring only to the “Washdyke Industrial Development Area”.	Amend the DEV3 chapter to ensure all references to the chapter name are correct.
Hilton Haulage Limited Partnership	168.28	DEV3 - Washdyke Industrial Development Area	Plans	Figure 23 - Washdyke Industrial Development Area Plan	Considers there are public health and safety concerns, as well as security concerns about the export food safety, associated with the use of a walkway and cycleway along and through 6 Milward Street. Hence requests to amend the walk/cycleway so that it extends within the current and future road corridor along Milward Street and Road 4 to Washdyke Lagoon, rather than along and through 6 Milward Street.	Amend Figure 23 - Washdyke Industrial Development Area Plan walkway/cycleway as follows: <ul style="list-style-type: none"> - delete the section running west/east from Meadows Road to the Washdyke Lagoon along the southern boundary of 6 Milward Street (Seaward Drain); - delete the section running south from Road 4 through the 6 Milward Street site; and - extend the section running west/east from Meadows Road to Washdyke Lagoon along Milward Street and Road 4.
Hilton Haulage Limited Partnership	168.29	DEV3 - Washdyke Industrial Development Area	Objectives	DEV3-O1 Key Outcomes for the Development Area	Considers DEV3-O1 is appropriate.	Retain as notified.
Hilton Haulage Limited Partnership	168.30	DEV3 - Washdyke Industrial Development Area	Policies	DEV3-P1 Anticipated Activities	Considers DEV3-P1 is appropriate, however the reference to “development” should include a reference to “land use and subdivision”. Further, it is not clear what the “associated requirements” are.	Amend DEV3-P1 as follows: DEV3-P1 Anticipated Activities Enable <u>land use, subdivision</u> and development that complies with the Washdyke Industrial Development Area and any associated requirements .
Hilton Haulage Limited Partnership	168.31	DEV3 - Washdyke Industrial Development Area	Rules	DEV3-R1 Land use, subdivision and development	Considers DEV-R1 is appropriate.	Retain as notified.
Hilton Haulage	168.32	DEV3 - Washdyke	Standards	DEV3-S1 Rooding	Considers DEV3-S1 is appropriate.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
		Industrial				
Limited Partnership		Development Area				
Hilton Haulage Limited Partnership	168.33	DEV3 - Washdyke Industrial Development Area	Standards	DEV3-S2 Stormwater, water and sewerage infrastructure	Considers DEV3-S2 is appropriate.	Retain as notified.
Hilton Haulage Limited Partnership	168.34	DEV3 - Washdyke Industrial Development Area	Standards	DEV3-S3 Walkway/cycleways	Requests to amend DEV3-S3 to refer to the design and construction of walkways / cycleways on “their land”, rather than the whole area.	Amend DEV3-S3 as follows: DEV3-S3 Walkway/cycleways DEV3 - Washdyke Industrial Development Area <i>At the time of land use, subdivision or development and prior to any new buildings being occupied, the developer shall design and construct at walkway/cycleways <u>on their land</u> indicated on the Washdyke Industrial Development Area to include:</i> <i>1. a minimum reserve width of 6 metres;</i> <i>2. a minimum formed width of 2.5 metres;</i> <i>3. planting and mulching of the remaining 3.5 metres;</i> <i>4. for the formed width, 200mm (depth) of compacted AP65 must be provided, after vegetation and topsoil is removed. A 100mm layer of compacted AP20 is then to be applied and topped with 25mm of crusher dust.</i> <i>5. for the unformed width, a planting plan incorporating appropriate native plants and 100mm depth of bark mulch is to be submitted to Council for approval prior to planting.</i>
Hilton Haulage Limited Partnership	168.35	DEV3 - Washdyke Industrial Development Area	Standards	DEV3-S4 Parks	Supports DEV3-S4 on the basis that while it does not indicate the location of parks, it is understood that these may be incorporated in future.	Retain as notified.
Hilton Haulage Limited Partnership	168.36	DEV3 - Washdyke Industrial Development Area	Standards	DEV3-S5 Vesting of roads services and infrastructure	Considers DEV3-S5 is appropriate.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Hilton Haulage Limited Partnership	168.37	EW - Earthworks	Rules	EW-R1 Earthworks, excluding earthworks [...]	Requests to amend EW-R1 to provide an additional exclusion for earthworks required to achieve minimum flood floor levels.	Amend the rule heading of EW-R1 as follows: <i>EW-R1 Earthworks, excluding earthworks:</i> <i>[...]</i> <i>h. within the building footprint, or within 2m of the outer edge of, a building that has building consent and that complies with EW-S3. This exemption does not apply to earthworks associated with retaining walls/structures which are not required for the structural support of the principal building on the site or adjoining site; <u>and</u></i> <i>i. necessary to achieve minimum floor levels specified in a Flood Risk Certificate in Rule NH-S1.</i>
Hilton Haulage Limited Partnership	168.38	CE - Coastal Environment	Rules	Rule CE-R4(4) Seawater Inundation	Supports the rule provides a pathway to permit natural hazard sensitive activities that are subject to flooding, including by way of minimum finished floor level requirements.	Retain rule as notified.
Road Metals Company Limited	169.1	Definitions	Definitions	Bank	Opposes the definition of bank, as it relates to areas that are defined by the RMA as 'bed', additionally the PDP figure for riparian area, refers to the bank edge but not the bank. This makes it unclear how to interpret these terms, as it overlaps the area already understood to be the "bed" of the river. None of the rules which use this term appear to require it to be distinguished from the "bed".	Delete the Definition of Bank .
Road Metals Company Limited	169.2	Definitions	Definitions	Cleanfill material	Supports the definition of cleanfill, but concerned it only extends to depositing 'virgin material' which limits the ability to rehabilitate quarry areas due to the lack of availability of such material at any reasonable cost. The PDP requires consent for rehabilitation involving any material not meeting this narrow definition of cleanfill as the rules only make reference to quarrying activities, not the deposition of inert material within the excavated area associated with, for example, rehabilitation. The definition also does not specifically include resource recovery unless it is simply recycling aggregate. Given the current direction to minimise waste and the implications of the waste levy, recovering material at a quarry site has advantages that the current plan does not realise.	1. Retain definition of Cleanfill material as notified; AND 2. Amend Rules to allow for quarry rehabilitation without a separate consent (the rehabilitation can be addressed / assessed in the land use consent) and to allow for recycling of resource (concrete, etc).

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Road Metals Company Limited	169.3	Definitions	Definitions	Quarry	Supports the definition of 'quarry' as it is consistent with National Planning Standards.	Retain the definition of Quarry as notified.
Road Metals Company Limited	169.4	Definitions	Definitions	Quarrying Activities	Supports the definition of 'quarrying activities' in so far as it encompasses the range of activities associated with quarrying, however, as per submission point 169.2, the definition of cleanfill does limit the ability of quarry operators to rehabilitate quarries and will not aid in waste minimisation.	1. Retain the definition of Quarrying Activities as notified; AND 2. amend Rules surrounding quarrying to create a more integrated and efficient rule framework. Refer to the submitter's comments on GRUZ-R16.
Road Metals Company Limited	169.5	Definitions	Definitions	Sensitive Environment	This definition is broad and has been used for two different rules, being rules in relation to hazardous substance use, and quarries. These activities potentially affect different sensitive areas, with some activities listed in the definition being relevant to one or the other, but not both. This creates complexity and confusion. Further, new quarries in the GRUZ are already discretionary activities so assessment against all relevant matters is required despite the definition.	Delete the definition of Sensitive Environment .
Road Metals Company Limited	169.6	Definitions	Definitions	Rural Industry	Conditionally supports the definition of 'rural industry' as taken from the NPS. However, it is assumed that the storage of vehicles and machinery associated with quarrying activities are included within the definition.	1. Retain definition of Rural Industry , on the basis that the definition encompasses the storage of vehicles and machinery associated with quarrying. OR 2. If the storage of vehicles and machinery is not included as above, the PDP should be amended to recognise these activities, which support and service primary production activities, are appropriate in the GRUZ.
Road Metals Company Limited	169.7	Planning Maps	SASM Overlay		Opposes the SASM map overlay as these differ from areas of significance to Tangata Whenua maps in the Regional Plans. The district and regional plans should use the same SASM maps.	Amend the Sites and Areas of Significance of Māori (SASM) map overlay to align with areas of significance used by Environment Canterbury's planning documents.
Road Metals Company Limited	169.8	SD - Strategic Direction	Objectives	SD-O8 Infrastructure	Opposes SDO-O8 as it does not include consideration of activities that provide an important part of the supply chain for critical infrastructure, such as quarries. Amend SD-O8 to include recognition of the value and necessity of materials to support the construction, repair, maintenance and upgrade of infrastructure, including critical and lifeline infrastructure.	Amend SD-O8 Infrastructure as follows: <i>i. [...]</i> <i>v. <u>infrastructure is supported through a readily available, local supply of the physical construction materials requirements of infrastructure.</u></i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Road Metals Company Limited	169.9	SD - Strategic Direction	Objectives	SD-09 Rural Areas	Supports SD-09 as quarrying activities are included in the definition of primary productions, and the recognition that reverse sensitivity effects on primary production need to be avoided.	Retain as notified.
Road Metals Company Limited	169.10	EI - Energy and Infrastructure	Rules Section G - Flight Paths Protection for Richard Pearse Airport (Timaru Airport)	EI-R38 Creation of a new stormwater basin or water body (including wastewater oxidation pond) which exceeds 500m in area)	There are many waterbodies (e.g. quarry wash water ponds) where stormwater management experience is not needed. Stormwater management does not appear to be relevant to the standards listed in PER-3. Request the rule explicitly states that replacement ponds do not require consent.	Amend EI-R38 Creation of a new stormwater basin or water body (including wastewater oxidation pond) which exceeds 500m in area as follows: <i>EI-R38 Creation of a new stormwater basin or water body (including wastewater oxidation pond but excluding a replacement of an existing pond) which exceeds 500m² in area</i> Activity status: Permitted Where: [...] PER-3 <i>Any water body has been designed by a suitably qualified person, with experience in stormwater management systems, to the following standards:</i> [...]
Road Metals Company Limited	169.11	EI - Energy and Infrastructure	Rules Section G - Flight Paths Protection for Richard Pearse Airport (Timaru Airport)	EI-R40 New landfills, excluding clean fills, within the Bird strike Management Overlay	The narrow definition of cleanfill means that many other types of fill (e.g. construction and demolition waste) cannot be used. That type of material does not attract birds and is not a bird strike risk. It is presently deposited in quarries at levels and close to Christchurch airport. Using this narrow definition limits the ability to rehabilitate quarries. Managed and controlled fills that do not include putrescible waste and do not attract birds should be excluded.	Amend EI-R40 as follows: <i>EI-R40 New landfills, excluding clean fills, managed or controlled fills within the Bird strike Management Overlay</i>
Road Metals Company Limited	169.12	CL - Contaminated Land	Objectives	CL-O1 Management of contaminated land	Opposes CL-O1 as the wording is unclear and should be amended to provide clarity and assist implementation.	Amend CL-O1 Management of contaminated land as follows: <i>Contaminated land is made safe for human health and its intended use before any change of use, land disturbance, development or subdivision so that human health of users and residents of the site is protected.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Road Metals Company Limited	169.13	CL - Contaminated Land	Policies	CL-P1 Investigation of contaminated and potentially contaminated land	There are instances where investigation is not feasible or efficient prior to soil disturbance, therefore a more flexible policy is sought. E.g. small scale roading projects which require disturbance of asphalt.	Amend CL-P1 Investigation of contaminated and potentially contaminated land as follows: <i>Require the investigation of contaminated land or potentially contaminated land prior to any change of use, land disturbance, development or subdivision of land that could result in an increase in the risk to human health resulting from any contamination of the land, <u>except in instances where it is not safe or not practicable to undertake investigation prior to the project commencing, or if disturbance is required to ascertain contaminants.</u></i>
Road Metals Company Limited	169.14	CL - Contaminated Land	Policies	CL-P3 Remediation and management works	Opposes CL-P3 as the wording is confusing and it should be amended for clarity and ease of implementation.	Amend CL-P3 Remediation and management works as follows: <i>Ensure that the risks to human health from any remediation of, or any management works undertaken on, contaminated land, do not increase the <u>risks to human health from the contamination that is present</u>, and, where possible encourage the reduction of those risks.</i>
Road Metals Company Limited	169.15	NH - Natural Hazards	Rules	NH-R4 Natural hazard sensitive activities or structures and additions to such activities or structures with a ground floor area of 30M ² or more	It is unclear if the rule applies to all structures or just those that are sensitive to natural hazards. It is also unclear if 'ground floor area' applies to all structures.	Amend the title of NH-R4 as follows: <i>NH- R4 Natural hazard sensitive activities or structures and additions to such activities or structures with a ground floor area of 30m² or more</i>
Road Metals Company Limited	169.16	HS - Hazardous Substances	Rules	HS-R1 Use and/or storage of hazardous substances in a hazardous facility (excluding Major Hazard Facilities)	Opposes HS-R1 as it refers to 'sensitive environment' which has a broad definition, meaning hazardous substances will require consent under almost every overlay in the PDP, some of which are not relevant (e.g. visual amenity landscapes).	Amend HS-R1 R1 Use and/or storage of hazardous substances in a Oppose hazardous facility (excluding Major Hazard Facilities) to be specific regarding the definition of "sensitive environment" and restrict the matters to those relevant to effects from hazardous substances. OR Alternatively list the relevant matters in this rule and remove the definition.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Road Metals Company Limited	169.17	SASM - Sites and Areas of Significance to Māori	Rules	SASM-R5 Mining and quarrying	Supports protecting cultural heritage and supports PER-1 but requests amendments as 'quarrying' is not defined which could create confusion. Requests PER-2 is deleted to avoid duplication as this matter is addressed in ECan consents.	<p>Retain this activity as a permitted activity but amend SASM- R5 as follows:</p> <p>SASM-R5.2 Mining and Quarrying</p> <p>2. Wai Taoka Overlay</p> <p>PER-1 <i>The quarrying is from <u>in</u> the bed of a river, and is authorised under the Canterbury Land and Water Regional Plan (either as a permitted activity, or through a resource consent having been obtained);</i> and</p> <p>PER-2 <i>Excavated materials are removed from the bed the bed of the within 10 days.</i></p>
Road Metals Company Limited	169.18	SASM - Sites and Areas of Significance to Māori	Rules	SASM-R5 Mining and quarrying	Supports protecting cultural heritage but requests amendments to avoid duplication of matters addressed in ECan consents.	<p>Amend SASM-R5 as follows:</p> <p>SASM-R5 Mining and quarrying</p> <p>1. Wāhi tūpuna Overlay</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1 <i>The mining and/or quarrying do not exceed a maximum area of 750m2; and</i></p> <p>PER-2 <i>...; <u>or</u></i></p> <p>PER-3 <i><u>The quarry is in the bed of a river and is authorised under the Canterbury Land and Water Regional Plan (either as a permitted activity, or through a resource consent having been obtained).</u></i></p>
Road Metals Company Limited	169.19	ECO - Ecosystems and Indigenous Biodiversity	Policies	ECO-P5 Protection of Significant Natural Areas	Opposes ECO-P5 as it does not provide for quarrying activities in SNAs consistent with the exposure draft of the National Policy Statement for Indigenous Biodiversity. This recognises that quarrying activities must be undertaken where the aggregate resources exist and provides for these activities in certain circumstances.	<p>Amend ECO-P5 Protection of Significant Natural Areas as follows:</p> <p><i>Avoid the clearance of indigenous vegetation and earthworks within SNAs, unless these activities:</i></p> <p>1. can be undertaken in a way that protects the identified ecological values; and</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
						<p>2. are for regionally significant infrastructure and it can be demonstrated that adverse effects are managed in accordance with EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure; <u>or</u></p> <p>3. <u>are for a quarry that provides significant national or regional public benefit that could not otherwise be achieved domestically.</u></p>
Road Metals Company Limited	169.20	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R1 Clearance of indigenous vegetation (except as provided for in ECO-R2 for flood protection works or ECO-R3 for National Grid activities)	Requests amendments to provide for key activities relating to maintaining public safety and existing infrastructure. For clarity, we suggest making it clear that agents of the Road Requiring Authority are also able to work under this rule.	<p>Amend ECO-R1 as follows:</p> <p>ECO-R1 - Clearance of indigenous vegetation (except as provided for in ECO-R2 for flood protection works or ECO-R3 for National Grid activities)</p> <p>Activity status: Permitted</p> <p>Where</p> <p>PER-1 The vegetation to be cleared is causing an imminent danger to human life, <u>or is affecting the safe operation of</u> structures, or utilities, and the clearance is undertaken in accordance with advice from a suitably qualified arborist; or</p> <p>PER-2 The clearance is carried out by the relevant Road Requiring Authority <u>or their agent</u>:</p> <p>1. to install, <u>repair, maintain or upgrade</u> road safety assets for the purpose of reducing traffic risk within the road corridor, and the clearance is less than 5m² within a single SNA; or</p> <p>2. to maintain existing roadside drainage; or</p> <p>[...]</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Road Metals Company Limited	169.21	ECO - Ecosystems and Indigenous Biodiversity	Rules	New	Considers a new rule be added to the plan to recognise the policy direction provided by the exposure draft of the National Policy Statement for Indigenous Biodiversity and to provide for quarrying activities.	<p>Add a new rule as follows:</p> <p><u>ECO-RX Clearance of indigenous vegetation for quarrying activities</u></p> <p><u>Activity status: Restricted discretionary</u></p> <p><u>The matters of discretion are:</u></p> <p><u>1. The effects that the vegetation alteration or removal will have on ecological values, including on threatened systems and ecosystems.</u></p> <p><u>2. The effects that vegetation removal will have on soil conservation, water quality and hydrological function of the catchment</u></p> <p><u>3. Methods to offset and compensate for the adverse effects of vegetation alteration and removal.</u></p> <p><u>4. Methods to contain and control plant pathogens and diseases, and pest plants.</u></p>
Road Metals Company Limited	169.22	NATC - Natural Character	Policies	NATC-P5 Anticipated activities in riparian margins	Opposes NATC-P5 as it does not provide for activities such as extraction of aggregate which is necessary to support the construction and maintenance of housing and infrastructure, from riverbeds. This would be consistent with the exposure draft of the NPS for indigenous biodiversity and the NPS for Freshwater.	<p>Amend NATC-P5 Anticipated activities in riparian margins as follows:</p> <p><i>Provide for activities in riparian margins which are appropriate for safety, enhancement, wellbeing or customary reasons, by enabling:</i></p> <p><u>1 [...]</u></p> <p><u>[...]</u></p> <p><u>5. earthworks that are for the purpose of maintenance and repair of existing fences, tracks, roads or for limited new fencing and tracks; and</u></p> <p><u>6. quarrying activities, which must be located where aggregate is located and support the construction and maintenance of homes and infrastructure.</u></p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Road Metals Company Limited	169.23	NATC - Natural Character	Rules	NATC-R1 Vegetation clearance	Opposes NATC-R1 as it provides only for a very narrow range of activities in riparian margins and constrains day-to-day activities which provide for activities necessary to support the operation and maintenance of existing infrastructure. Supports NATC-R1 matters of discretion no. 6 as it recognises that some activities have a functional need to be located in proximity to rivers.	<p>Amend NATC- R1 Vegetation clearance Riparian margins of a river that is not an HNWB as follows:</p> <p>Activity status: Permitted</p> <p>PER-1 [...]</p> <p>PER-4 The vegetation clearance is for the maintenance, repair, or upgrade in seal cover, of existing roads, including their associated bridges, stormwater infrastructure and signage; or</p> <p>[...]</p> <p>AND</p> <p>Retain NATC-R1 Vegetation Clearance, Activity status when compliance not achieved with PER-2, PER-3. PER-5, PER-6 or CON-1: Restricted Discretionary, Matter of discretion (6).</p>
Road Metals Company Limited	169.24	NATC - Natural Character	Rules	NATC-R3 Earthworks	Opposes NATC-R3 as there are other activities that should be provided for. Expanding the activities covered by the rule, would reduce the consenting burden but have similar effects.	<p>Amend NATC-R3 Earthworks as follows:</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1 The earthworks are required for the maintenance, <u>upgrade</u>, and/or repair of existing fences, tracks, roads, <u>bridges, pipelines, drainage or sewerage and other critical infrastructure</u>, or natural hazard mitigation works; or</p> <p>[...]</p>
Road Metals Company Limited	169.25				Submission point deleted due to duplication, refer submission point 169.23.	Refer submission point 169.23.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Road Metals Company Limited	169.26	NFL - Natural Features and Landscapes	Policies	NFL-P2 Enabling appropriate use and development	Supports NFL-P2 as it recognises and provides for the continuation of existing primary production activities, provided the recognised values are maintained.	Retain as notified.
Road Metals Company Limited	169.27	PA - Public Access	Objectives	PA-O1 Public access	Opposes PA-O1 as should clearly state when public access is restricted. Use of the terms 'desirable' is considered subjective and should be substituted for a different term.	Amend PA-O1 Public access as follows: <i>Public access to and along the coastal marine area and the margins of identified wetlands and rivers is maintained and enhanced, and only restricted where desirable necessary to <u>avoid adverse effects on natural character, landscape, indigenous biodiversity, cultural or recreational values, health and safety, or the rights of private property owners.</u></i>
Road Metals Company Limited	169.28	PA - Public Access	Policies	PA-P4 Limiting public access	Supports PA-P4 as it supports public health and safety.	Retain as notified.
Road Metals Company Limited	169.29	VS - Versatile Soil	Policies	VS-P2 Maintaining availability of versatile soils	Opposes VS-P2 as it does not recognise that quarries need to be located where the aggregate is located. The NPS for Highly Productive Land provides policies and consenting pathways for quarries to be located in areas of versatile soils. Such an approach should be provided for. Additionally, rehabilitation can provide for productive soils to be returned to areas that have formerly been quarried.	Amend VS-P2 Maintaining availability of versatile soils as follows: <i>Maintain the availability of versatile soils for non-intensive primary production within the Versatile Soils Overlay by:</i> 1... [...] 5. <i>only allowing activities that foreclose the ability to use versatile soils for non-intensive primary production where:</i> <i>a) the activity is necessary to support non-intensive primary production; or</i> <i>b) there are significant wider public benefits from the activity and there is a functional, technical or operational need to be located in overlay; or</i> <i>c) it is provided for by VS-P3; <u>or</u></i> <i><u>d) the activity is a quarry that provides significant national or regional public benefit that could not otherwise be readily achieved using resources within New Zealand.</u></i>
Road Metals Company Limited	169.30	SUB - Subdivision	Objectives	SUB-O3 Rural subdivision	Supports SUB-O3 as it rightly recognises that reverse sensitivity effects can arise from subdivision in rural areas. However, it is unclear why the protection from reverse sensitivity is applied only to intensive primary production.	Amend SUB-O3 Rural subdivision as follows: <i>Subdivision in the rural zones will:[...]</i> 4. <i>minimise reverse sensitivity effects on <u>intensive</u> primary production.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Road Metals Company Limited	169.31	SUB - Subdivision	Policies	SUB-P5 Reverse sensitivity	Supports SUB-P5 As it rightly recognises that reverse sensitivity effects can arise from subdivision in rural areas. However, it is unclear why the protection from reverse sensitivity is applied only to intensive primary production. It should be applied to primary production activities.	Amend SUB- P5 Reverse sensitivity as follows: SUB-P5 Reverse sensitivity <i>Only allow subdivision that does not result in reverse sensitivity effects that would compromise the operation of regionally significant infrastructure/facilities and <u>legally-lawfully</u> established intensive primary production.</i>
Road Metals Company Limited	169.32	CE - Coastal Environment	Rules	CE-R14 Quarrying/Mining Activity (excluding for natural hazard mitigation works or reclamation within or adjacent the Port Zone)	Opposes CE-R14 as the non-complying status of this activity does not suitably recognise the importance of aggregate resources and the way they are spatially located. The term 'quarrying' is not defined but 'quarrying activity' is.	Amend CE-R14 as follows: CE-R14 <u>Quarrying/Mining/Quarrying</u> Activity (excluding for natural hazard mitigation works or reclamation within or adjacent the Port Zone) Activity status: <u>Non-complying Restricted Discretionary</u> Matters of discretion are restricted to: <u>1. the extent to which the proposal results in an increased risk of economic, social or environmental harm;</u> <u>2. whether the proposal includes hazard mitigation;</u> <u>3. measures to avoid, remedy or mitigate adverse effects on areas of Coastal High Natural Character</u> <u>4. the functional need for the mine/quarry to be in this location;</u> <u>5. the extent of any positive benefits that will result from the proposal; and 6. the extent to which the proposal creates natural hazard risks on adjacent properties; and</u> <u>6. the extent to which the proposal creates natural hazard risks on adjacent properties.</u>
Road Metals Company Limited	169.33	EW - Earthworks	Rules	EW-R1 Earthworks, excluding earthworks [...]	Opposes having quarrying activities in both the Zone rules and the earthworks provisions as this creates unnecessary duplication and an inconsistent approach through the different provisions. This creates unnecessary duplication and an inconsistent approach through the different provisions.	Retain EW-R1 Earthworks and the explanatory note as notified.
Road Metals Company Limited	169.34	NOISE - Noise	Objectives	NOISE-O2 Reverse sensitivity	Requests NOISE-O2 is amended to address lawfully established activities.	Amend NOISE-O2 Reverse sensitivity as follows: <i>The Airport, Raceway, State Highway, railway lines and the Port and activities located within commercial, mixed use, <u>rural</u> and Industrial zones, <u>and other lawfully established activities</u> are not constrained by reverse sensitivity effects arising from noise sensitive activities.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Road Metals Company Limited	169.35	NOISE - Noise	Rules	NOISE-R12 New noise sensitive activities, alterations to existing buildings for use by a noise sensitive activity or subdivision to accommodate a noise sensitive activity	Considers a new rule is necessary to address new sensitive activities in proximity to lawfully established quarries to be added to the PDP.	<p>Amend NOISE-R12 New noise sensitive activities, alterations to existing buildings for use by a noise sensitive activity or subdivision to accommodate a noise sensitive activity as follows:</p> <p>[...]</p> <p>3.</p> <p><u>Within</u></p> <p><u>a. 200m of any lawfully established excavation area</u></p> <p><u>b. 500m of any lawfully established processing area</u></p> <p><u>c. 500m of any activity that involves blasting.</u></p> <p><u>Activity status when compliance not achieved: Discretionary</u></p>
Road Metals Company Limited	169.36	RELO - Relocated Buildings and Shipping containers	Rules	RELO-R1 Placement of a relocated building	If companies have licensed building practitioners in house they may be able to undertake the work as envisaged by this rule, but without entering into a contract.	<p>Amend RELO-R1 Placement of a relocated building as follows:</p> <p>1. All zones except the General Industrial Zone and Port Zone</p> <p>Activity status: Controlled</p> <p>Where:</p> <p>CON-1</p> <p>The applicant has entered into a contract with a Licensed Building Practitioner that confirms that within twelve months of the building being located on the site:</p> <p>1. the building will be permanently sited on foundations; and</p> <p>2. any damage to the exterior of the relocated building will be repaired to a tradesman's like manner.</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary						
Road Metals Company Limited	169.37	RELO - Relocated Buildings and Shipping containers	Rules	RELO-R2 Placement of a shipping container	Opposes this rule that requires a resource consent even where the shipping container is not visible from the road. Managing the effects even where these are not visible does not seem to give effect to policy RELO-P2.	<p>Amend RELO-R2 Placement of a shipping container as follows:</p> <p>[...]</p> <p>2.All zones except the General industrial Zone and the Port Zone</p> <p>Activity Status: Controlled Permitted</p> <p>Where:</p> <p>CON PER-1</p> <p>The shipping container is either:</p> <ol style="list-style-type: none"> located more than 20m from a road boundary; or is not visible from the road; and <p>CON PER --2</p> <p>The maximum total area of all shipping containers on the site does not exceed:</p>						
						<table> <tr> <td>Site Area</td> <td>Total Area of Shipping Container</td> </tr> <tr> <td><10ha</td> <td>20m²</td> </tr> <tr> <td>>10ha</td> <td>20m²per 10ha of site</td> </tr> </table> <p>and</p> <p>CON PER -3</p> <p>There is no stacking of shipping containers.</p> <p>Activity status where compliance is not achieved: Restricted discretionary Controlled</p> <p>The matters of discretion control are restricted to:</p> <ol style="list-style-type: none"> location on the site; and visibly of the shipping container beyond the boundary of the site; and the exterior appearance of the shipping container; and landscaping and screening; and the number of shipping containers on the site and cumulative effects on visual amenity and the character of the area. 	Site Area	Total Area of Shipping Container	<10ha	20m ²	>10ha	20m ² per 10ha of site
Site Area	Total Area of Shipping Container											
<10ha	20m ²											
>10ha	20m ² per 10ha of site											
Road Metals Company Limited	169.38	GRUZ - General Rural Zone	Objectives	GRUZ-O1 Purpose of the General Rural Zone	Supports GRUZ-O1 as it recognises the role of primary production in the rural landscape.	Not specified.						
Road Metals Company Limited	169.39	GRUZ - General Rural Zone	Objectives	GRUZ-O2 Character and qualities of the General Rural Zone	Supports GRUZ-O2 as it recognises that primary production activities, which are appropriate in the rural environment, may generate noise, odour, light and traffic	Not specified.						
Road Metals Company Limited	169.40	GRUZ - General Rural Zone	Objectives	GRUZ-O3 Protecting primary production	Supports GRUZ-O3 as it recognises that sensitive activities can affect the effectiveness of primary productive activities in the rural zone.	Not specified.						

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Road Metals Company Limited	169.41	GRUZ - General Rural Zone	Objectives	GRUZ-O4 Protecting sensitive activities and sensitive zones	<p>Considers that GRUZ-O4 should acknowledge that quarrying activities, which are anticipated in the rural zones, should not be held to a higher standard than other activities in the zone.</p> <p>Given that quarrying activities are a primary production activity that is anticipated in the rural zone.</p>	<p>Amend GRUZ -O4 Protecting sensitive activities and sensitive zones as follows:</p> <p><i>Effects from Intensive primary production, mining, quarrying and other intensive activities generates no or minimal adverse effects on:</i></p> <ol style="list-style-type: none"> <i>sensitive activities; and</i> <i>land close to Residential, Rural settlement, Māori Purpose and Open space zones <u>avoid, remedy or mitigate adverse effects.</u></i>
Road Metals Company Limited	169.42	GRUZ - General Rural Zone	Objectives	GRUZ-O5 Mining and quarrying	<p>This objective holds quarrying to a higher standard than other activities that are appropriate for the zone.</p> <p>Quarrying is an appropriate and anticipated activity within the rural zone, and these activities must be located where the resource exists.</p>	<p>Amend GRUZ-O5 Mining and quarrying as follows:</p> <p><i>Mining and quarrying occurs in the General Rural Zone where the resource exists and where it will have no or minimal adverse effects on the sensitive environments and sensitive activities <u>are avoided, remedied or mitigated.</u></i></p>
Road Metals Company Limited	169.43	GRUZ - General Rural Zone	Policies	GRUZ-P6 Mining and quarrying activities	<p>The wording of this policy could be better structured to give effect to recognise mining and quarrying are appropriate in the rural zone.</p>	<p>Amend GRUZ-P6 Mining and quarrying activities as follows:</p> <ol style="list-style-type: none"> <i>Enable small scale quarry activities (up to 2,000m²), subject to requirements to protect the environment and sensitive activities;</i> <i>Only allow <u>Provide for</u> mining and other quarry activities in the General rural zone where:</i> <ol style="list-style-type: none"> <i>[...]</i>
Road Metals Company Limited	169.44	GRUZ - General Rural Zone	Rules	GRUZ-R16 Quarries and quarrying activities [...]	<p>Opposes GRUZ-R16 as it represents further duplication of rules in instances where consent has already been obtained from Environment Canterbury. Inert fill that does not fall within the definition of cleanfill should also be allowed for to avoid unnecessarily limiting the rehabilitation of a quarry. The distance from a sensitive receptor at 500 metres is not common to the rest of Canterbury.</p>	<p>Amend GRUZ -R16 as follows:</p> <p><i>GRUZ-R16 Quarries and quarrying activities <u>including backfilling with managed fill:</u></i></p> <p><i>[...]</i></p> <p><i>PER-2</i></p> <p><i>The quarry is not within 50m of a rock art site; and PER-3 The quarry is not located within 500 <u>250m</u> of an existing sensitive activity located on another site or the boundary of any of the Residential zones, Rural lifestyle zone, Rural settlement zone, Māori Purpose zone or Open Space and recreation zones; and</i></p> <p><i>[...]</i></p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Road Metals Company Limited	169.45	GRUZ - General Rural Zone	Rules	GRUZ-R23 Expansion of existing consented quarries	Opposes GRUZ-R23 as it does not provide for lawfully established, un-consented quarries. Considers the term “quarry operation” should be replaced with a defined term and that there is a difference in potential effects between extraction activities and processing, the rule should make this distinction.	<p>Amend GRUZ- R23 as follows:</p> <p>GRUZ-R23 Expansion of existing <u>lawfully established consented</u> quarries.</p> <p>Activity status: Restricted Discretionary</p> <p>RDIS-1 The entirety of the existing quarrying activity operation <u>activity operation</u> has an existing land use consent from Timaru District Council <u>or is otherwise lawfully established</u>; and</p> <p>RDIS-2 The expansion of the existing quarry does not increase: a) the rate of production beyond existing <u>lawfully established consented</u> levels, and b) the hours of operation; and</p> <p>RDIS-3 The expansion does not occur within:</p> <p>a) <u>i. 500m for processing activities; and</u> <u>ii. 200m for any excavation activity;</u> of an existing sensitive activity located on another site, or the boundary of a Residential, Rural Lifestyle, Rural Settlement, Māori Purpose or Open Space zone; or b) 20m of a site boundary [...]</p>
Road Metals Company Limited	169.46	GRUZ - General Rural Zone	Standards	GRUZ-S4 Setbacks for sensitive activities	Supports GRUZ-S4 as this standard sets out requirements for where sensitive activities can establish to avoid reverse sensitivity effects.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Road Metals Company Limited	169.47	GIZ - General Industrial Zone	Rules	GIZ-R1 Industrial activity Trade supplier Laboratories Service stations Motor garage Emergency services facilities Veterinary clinics Excluding any industrial ancillary activity and offensive trades	Opposes GIZ-R1 as it appears to exclude some activities such as the submitters yard where maintenance and servicing of machinery and plant are conducted.	Amend heading of GIZ-R1 as follows: <i>GIZ-R1 Industrial activity Trade supplier Laboratories Service stations Motor garage Emergency services facilities Veterinary clinics, <u>transport, storage, maintenance, cleaning or repair of goods and vehicles and the hire of commercial and industrial equipment and machinery.</u> Excluding any industrial ancillary activity and offensive trades.</i>
Road Metals Company Limited	169.48	APP5 - Criteria for Identifying Significant Natural Areas	General	General	Opposes Appendix 5 as it is not consistent with the National Policy Statement for Indigenous Biodiversity (NPSIB) framework for assessing Significant Natural Areas.	Amend APP5 - Criteria for Identifying Significant Natural Areas to be consistent to the National Policy Statement for Indigenous Biodiversity.
Fulton Hogan Limited	170.1	Definitions	Definitions	Bank	Opposes the definition of bank, as it relates to areas that are defined by the RMA as 'bed', additionally the PDP figure for riparian area, refers to the bank edge but not the bank. This makes it unclear how to interpret these terms, as it overlaps the area already understood to be the "bed" of the river. None of the rules which use this term appear to require it to be distinguished from the "bed".	Delete the definition of ' Bank '.
Fulton Hogan Limited	170.2	Definitions	Definitions	Cleanfill material	Supports the definition of cleanfill, but concerned it only extends to depositing 'virgin material' which limits the ability to rehabilitate quarry areas due to the lack of availability of such material at any reasonable cost. The PDP requires consent for rehabilitation involving any material not meeting this narrow definition of cleanfill as the rules only make	1. Retain definition of Cleanfill material as notified; AND

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
					<p>reference to quarrying activities, not the deposition of inert material within the excavated area associated with, for example, rehabilitation.</p> <p>The definition also does not specifically include resource recovery unless it is simply recycling aggregate. Given the current direction to minimise waste and the implications of the waste levy, recovering material at a quarry site has advantages that the current plan does not realise.</p>	2. amend Rules surrounding quarrying to create a more integrated and efficient rule framework. Refer to the submitter's comments on GRUZ-R16.
Fulton Hogan Limited	170.3	Definitions	Definitions	Quarry	Supports the definition of quarry as it is consistent with National Planning Standards.	Retain as notified.
Fulton Hogan Limited	170.4	Definitions	Definitions	Quarrying activities	Supports the definition of quarrying activities in so far as it encompasses the range of activities associated with quarrying, however, as per other submission point 170.2, the definition of cleanfill does limit the ability of quarry operators to rehabilitate quarries and will not aid in waste minimisation.	<p>1. Retain the definition of Quarrying Activities as notified;</p> <p>AND</p> <p>2. amend Rules surrounding quarrying to create a more integrated and efficient rule framework. Refer to the submitter's comments on GRUZ-R16.</p>
Fulton Hogan Limited	170.5	Definitions	Definitions	Sensitive Environment	This definition is broad and has been used for two different rules, being hazardous substance use, and quarries. These activities potentially affect different sensitive areas, with some activities listed in the definition being relevant to one or the other, but not both. This creates complexity and confusion. Further, new quarries in the GRUZ are already discretionary activities so assessment against all relevant matters is required despite the definition.	<p>1. Delete the definition of Sensitive Environment;</p> <p>AND</p> <p>2. Include overlays/activities which trigger additional assessment in the relevant plan rule.</p>
Fulton Hogan Limited	170.6	Definitions	Definitions	Rural Industry	Conditionally supports the definition of rural industry as taken from the NPS. However, it is assumed that the storage of vehicles and machinery associated with quarrying activities are included within the definition.	<p>1. Retain definition of Rural Industry, on the basis that the definition encompasses the storage of vehicles and machinery associated with quarrying.</p> <p>OR</p> <p>2. If the storage of vehicles and machinery is not included as above, the PDP should be amended to recognise these activities, which support and service primary production activities, are appropriate in the GRUZ.</p>
Fulton Hogan Limited	170.7	Planning Maps	Drinking Water Protection Area Overlay		The bore as mapped, is not used for drinking water purposes.	Delete from the Planning Maps the Drinking Water Protection Overlay from 470 Pleasant Point Highway.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fulton Hogan Limited	170.8	Planning Maps	SASM Overlay		Opposes the SASM map overlay as these differ from areas of significance to Tangata Whenua maps in the Regional Plans. The district and regional plans should use the same SASM maps.	Amend the Sites and Areas of Significance of Māori (SASM) map overlay to align with areas of significance used by Environment Canterbury's planning documents.
Fulton Hogan Limited	170.9	SD - Strategic Direction	Objectives	SD-08 Infrastructure	Opposes SDO-08 as it does not include consideration of activities that provide an important part of the supply chain for critical infrastructure, such as quarries.	Amend SD-08 Infrastructure as follows: <i>i. [...]</i> <u><i>v. infrastructure is supported through a readily available, local supply of the physical construction materials requirements of infrastructure.</i></u>
Fulton Hogan Limited	170.10	SD - Strategic Direction	Objectives	SD-09 Rural Areas	Supports SD-09 as quarrying activities are included in the definition of primary production, and the recognition that reverse sensitivity effects on primary production need to be avoided.	Retain as notified.
Fulton Hogan Limited	170.11	EI - Energy and Infrastructure	Rules Section G - Flight Paths Protection for Richard Pearse Airport (Timaru Airport)	EI-R38 Creation of a new stormwater basin or water body (including wastewater oxidation pond) which exceeds 500m in area)	There are many waterbodies (e.g. quarry wash water ponds) where stormwater management experience is not needed. Stormwater management does not appear to be relevant to the standards listed in PER-3. Request the rule explicitly states that replacement ponds do not require consent.	Amend EI-R38 Creation of a new stormwater basin or water body (including wastewater oxidation pond but excluding a replacement of an existing pond) which exceeds 500m² in area as follows: Activity status: Permitted Where: [...] PER-3 <i>Any water body has been designed by a suitably qualified person, with experience in stormwater management systems, to the following standards:</i> [...]
Fulton Hogan Limited	170.12	EI - Energy and Infrastructure	Rules Section G - Flight Paths Protection for Richard Pearse Airport (Timaru Airport)	EI-R40 New landfills, excluding clean fills, within the Bird strike Management Overlay	The narrow definition of cleanfill means that many other types of fill (e.g. construction and demolition waste) cannot be used. That type of material does not attract birds and is not a bird strike risk. It is presently deposited in quarries at levels and close to Christchurch airport. Using this narrow definition limits the ability to rehabilitate quarries. Managed and controlled fills that do not include putrescible waste and do not attract birds should be excluded.	Amend EI-R40 New landfills, excluding clean fills, within the Bird strike Management Overlay as follows: EI-R40 New landfills, excluding clean fills, <u>managed or controlled fills</u> within the Bird strike Management Overlay [...]

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fulton Hogan Limited	170.13	CL - Contaminated Land	Objectives	CL-O1 Management of contaminated land	Opposes CL-O1 as the wording is unclear and should be amended to provide clarity and assist implementation.	<p>Amend CL-O1 Management of contaminated land as follows:</p> <p><i>Contaminated land is made safe for human health and its intended use before any change of use, land disturbance, development or subdivision <u>so that human health of users and residents of the site is protected.</u></i></p>
Fulton Hogan Limited	170.14	CL - Contaminated Land	Policies	CL-P1 Investigation of contaminated and potentially contaminated land	There are instances where investigation is not feasible or efficient prior to soil disturbance, therefore a more flexible policy is sought. E.g. small scale roading projects which require disturbance of asphalt.	<p>Amend CL-P1 Investigation of contaminated and potentially contaminated land to provide flexibility for instances where investigation is not practicable, as follows:</p> <p><i>Require the investigation of contaminated land or potentially contaminated land prior to any change of use, land disturbance, development or subdivision of land that could result in an increase in the risk to human health resulting from any contamination of the land, <u>except in instances where it is not safe or not practicable to undertake investigation prior to the project commencing.</u></i></p>
Fulton Hogan Limited	170.15	CL - Contaminated Land	Policies	CL-P3 Remediation and management works	The submitter considers the wording is confusing and it should be amended for clarity and ease of implementation.	<p>Amend CL-P3 Remediation and management works as follows:</p> <p><i>Ensure that the risks to human health from any remediation of, or any management works undertaken on, contaminated land, do not increase the <u>risks to human health from the contamination that is present</u>, and, where possible encourage the reduction of those risks.</i></p>
Fulton Hogan Limited	170.16	NH - Natural Hazards	Rules	NH-R4 Natural hazard sensitive activities or structures and additions to such activities or structures with a ground floor area of 30M ² or more	<p>It is unclear if the rule applies to all structures or just those that are sensitive to natural hazards.</p> <p>It is also unclear if 'ground floor area' applies to all structures.</p>	<p>Amend the title of NH-R4 as follows:</p> <p><i>NH- R4 Natural hazard sensitive activities or structures and additions to such activities or structures with a ground floor area of 30m² or more</i></p>
Fulton Hogan Limited	170.17	HS - Hazardous Substances	Rules	HS-R1 Use and/or storage of hazardous substances in a hazardous facility (excluding Major Hazard Facilities)	Opposes HS-R1 as it refers to 'sensitive environment' which has a broad definition, meaning hazardous substances will require consent under almost every overlay in the PDP, some of which are not relevant (e.g. visual amenity landscapes).	<p>Amend HS-R1 to be specific regarding the definition of "sensitive environment" and restrict the matters to those relevant to effects from hazardous substances;</p> <p>OR</p> <p>Alternatively list the relevant matters in this rule and remove the definition.</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fulton Hogan Limited	170.18	SASM - Sites and Areas of Significance to Māori	Rules	SASM-R5 Mining and quarrying	Supports protecting cultural heritage and supports PER-1 but requests amendments as 'quarrying' is not defined which could create confusion. Requests PER-2 is deleted to avoid duplication as this matter is addressed in ECan consents.	<p>Retain this activity as a permitted activity but amend SASM- R5 as follows:</p> <p>SASM-R5.2 Mining and Quarrying</p> <p>2. Wai Taoka Overlay</p> <p>PER-1 The quarrying is from <u>in</u> the bed of a river, and is authorised under the Canterbury Land and Water Regional Plan (either as a permitted activity, or through a resource consent having been obtained); and</p> <p>PER-2 Excavated materials are removed from the bed the bed of the within 10 days.</p>
Fulton Hogan Limited	170.19	SASM - Sites and Areas of Significance to Māori	Rules	SASM-R5 Mining and quarrying	Supports protecting cultural heritage but requests amendments to avoid duplication of matters addressed in ECan consents.	<p>Amend SASM-R5 as follows:</p> <p>SASM-R5 Mining and quarrying</p> <p>1. Wāhi tūpuna Overlay</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1 The mining and/or quarrying do not exceed a maximum area of 750m2; and</p> <p>PER-2 ...; <u>OR</u></p> <p>PER-3 <u>The quarry is in the bed of a river and is authorised under the Canterbury Land and Water Regional Plan (either as a permitted activity, or through a resource consent having been obtained).</u></p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fulton Hogan Limited	170.20	ECO - Ecosystems and Indigenous Biodiversity	Policies	ECO-P5 Protection of Significant Natural Areas	Opposes ECO-P5 as it does not provide for quarrying activities in SNAs consistent with the exposure draft of the National Policy Statement for Indigenous Biodiversity. This recognises that quarrying activities must be undertaken where the aggregate resources exist and provides for these activities in certain circumstances.	Amend ECO-P5 Protection of Significant Natural Areas as follows: <i>Avoid the clearance of indigenous vegetation and earthworks within SNAs, unless these activities:</i> 1. can be undertaken in a way that protects the identified ecological values; and 2. are for regionally significant infrastructure and it can be demonstrated that adverse effects are managed in accordance with EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure; <u>or</u> 3. <u>are for a quarry that provides significant national or regional public benefit that could not otherwise be achieved domestically.</u>
Fulton Hogan Limited	170.21	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R1 Clearance of indigenous vegetation (except as provided for in ECO-R2 for flood protection works or ECO-R3 for National Grid activities)	Requests amendments to provide for key activities relating to maintaining public safety and existing infrastructure.	Amend ECO-R1 Clearance of indigenous vegetation (except as provided for in ECO-R2 for flood protection works or ECO-R3 for National Grid activities) as follows: Activity status: Permitted Where PER-1 <i>The vegetation to be cleared is causing an imminent danger to human life, <u>or is affecting the safe operation of</u> structures, or utilities, and the clearance is undertaken in accordance with advice from a suitably qualified arborist; or</i> PER-2 <i>The clearance is carried out by the relevant Road Requiring Authority <u>or their agent:</u></i> 1. to install, <u>repair, maintain or upgrade</u> road safety assets for the purpose of reducing traffic risk within the road corridor, and the clearance is less than 5m ² within a single SNA; or 2. to maintain existing roadside drainage; or [...]

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fulton Hogan Limited	170.22	ECO - Ecosystems and Indigenous Biodiversity	Rules	New	As noted in our comments on ECO-P5, the NPSIB recognises the importance of aggregate extraction, which is locationally based. To reflect the policy direction provided by the NPSIB, a new rule should be added to reflect this policy direction and provide for quarrying activities.	<p>Add a new rule as follows:</p> <p><u>ECO-RX Clearance of indigenous vegetation for quarrying activities</u></p> <p><u>Activity status: Restricted discretionary</u></p> <p><u>The matters of discretion are:</u></p> <p><u>1. The effects that the vegetation alteration or removal will have on ecological values, including on threatened systems and ecosystems.</u></p> <p><u>2. The effects that vegetation removal will have on soil conservation, water quality and hydrological function of the catchment</u></p> <p><u>3. Methods to offset and compensate for the adverse effects of vegetation alteration and removal.</u></p> <p><u>4. Methods to contain and control plant pathogens and diseases, and pest plants.</u></p>
Fulton Hogan Limited	170.23	NATC - Natural Character	Policies	NATC-P5 Anticipated activities in riparian margins	Opposes NATC-P5 as it does not provide for activities such as extraction of aggregate which is necessary to support the construction and maintenance of housing and infrastructure, from riverbeds. This would be consistent with the exposure draft of the NPS for indigenous biodiversity and the NPS for Freshwater.	<p>Amend NATC-P5 Anticipated activities in riparian margins as follows:</p> <p><i>Provide for activities in riparian margins which are appropriate for safety, enhancement, wellbeing or customary reasons, by enabling:</i></p> <p><i>1 [...]</i></p> <p><i>[...]</i></p> <p><i>5. earthworks that are for the purpose of maintenance and repair of existing fences, tracks, roads or for limited new fencing and tracks; and</i></p> <p><u>6. quarrying activities, which must be located where aggregate is located and support the construction and maintenance of homes and infrastructure.</u></p>
Fulton Hogan Limited	170.24	NATC - Natural Character	Rules	NATC-R1 Vegetation clearance	Opposes NATC-R1 as it provides only for a very narrow range of activities in riparian margins and constrains day-to-day activities which provide for activities necessary to support the	Amend NATC- R1 Vegetation clearance Riparian margins of a river that is not an HNWB as follows:

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
					operation and maintenance of existing infrastructure. Supports NATC-R1 matters of discretion no. 6 as it recognises that some activities have a functional need to be located in proximity to rivers.	<p>Activity status: Permitted</p> <p>PER-1 [...]</p> <p>PER-4 The vegetation clearance is for the maintenance, repair, or upgrade in seal cover, of existing roads, including their associated bridges, stormwater infrastructure and signage; or</p> <p>[...]</p> <p>AND</p> <p>Retain NATC-R1 Vegetation Clearance, Activity status when compliance not achieved with PER-2, PER-3. PER-5, PER-6 or CON-1: Restricted Discretionary, Matter of discretion (6).</p>
Fulton Hogan Limited	170.25	NATC - Natural Character	Rules	NATC-R3 Earthworks	Opposes NATC-R3 as there are other activities that should be provided for. Expanding the activities covered by the rule, would reduce the consenting burden but have similar effects.	<p>Amend NATC-R3 Earthworks as follows:</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1 The earthworks are required for the maintenance, <u>upgrade</u>, and/or repair of existing fences, tracks, roads, <u>bridges, pipelines, drainage or sewerage and other critical infrastructure</u>, or natural hazard mitigation works; or</p> <p>[...]</p>
Fulton Hogan Limited	170.26	NFL - Natural Features and Landscapes	Policies	NFL-P2 Enabling appropriate use and development	Supports NFL-P2 as it recognises and provides for the continuation of existing primary production activities, provided the recognised values are maintained.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fulton Hogan Limited	170.27	PA - Public Access	Objectives	PA-O1 Public access	Opposes PA-O1 as should clearly state when public access is restricted. Use of the terms 'desirable' is considered subjective and should be substituted for a different term.	Amend PA-O1 Public access as follows: <i>Public access to and along the coastal marine area and the margins of identified wetlands and rivers is maintained and enhanced, and only restricted where desirable <u>necessary to avoid adverse effects on natural character, landscape, indigenous biodiversity, cultural or recreational values, health and safety, or the rights of private property owners.</u></i>
Fulton Hogan Limited	170.28	PA - Public Access	Policies	PA-P4 Limiting public access	Supports PA-P4 as it supports public health and safety.	Retain PA-P4 as notified.
Fulton Hogan Limited	170.29	VS - Versatile Soil	Policies	VS-P2 Maintaining availability of versatile soils	Opposes VS-P2 as it does not recognise that quarries need to be located where the aggregate is located. The NPS for Highly Productive Land provides policies and consenting pathways for quarries to be located in areas of versatile soils. Such an approach should be provided for. Additionally, rehabilitation can provide for productive soils to be returned to areas that have formerly been quarried.	Amend VS-P2 Maintaining availability of versatile soils as follows: <i>Maintain the availability of versatile soils for non-intensive primary production within the Versatile Soils Overlay by:</i> 1... [...] 5. <i>only allowing activities that foreclose the ability to use versatile soils for non-intensive primary production where:</i> <i>a) the activity is necessary to support non-intensive primary production; or</i> <i>b) there are significant wider public benefits from the activity and there is a functional, technical or operational need to be located in overlay; or</i> <i>c) it is provided for by VS-P3; <u>or</u></i> <i>d) <u>the activity is a quarry that provides significant national or regional public benefit that could not otherwise be readily achieved using resources within New Zealand.</u></i>
Fulton Hogan Limited	170.30	SUB - Subdivision	Objectives	SUB-O3 Rural subdivision	Supports SUB-O3 as it rightly recognises that reverse sensitivity effects arise from subdivision in rural areas. However, it is unclear why the protection from reverse sensitivity is applied only to intensive primary production. It should be applied to primary production activities.	Amend SUB-3 Rural subdivision as follows: <i>Subdivision in the rural zones will:</i> [...] 4. <i>minimise reverse sensitivity effects on intensive primary production.</i>
Fulton Hogan Limited	170.31	SUB - Subdivision	Policies	SUB-P5 Reverse sensitivity	Supports SUB-P5 as it rightly recognises that reverse sensitivity effects can arise from subdivision in rural areas. However, it is unclear why the protection from reverse sensitivity is applied only to intensive primary production. It should be applied to primary production activities.	Amend SUB- P5 Reverse sensitivity as follows: <i>Only allow subdivision that does not result in reverse sensitivity effects that would compromise the operation of regionally significant infrastructure/facilities and legally-lawfully established intensive primary production.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fulton Hogan Limited	170.32	CE - Coastal Environment	Rules	CE-R14 Quarrying/Mining Activity (excluding for natural hazard mitigation works or reclamation within or adjacent the Port Zone)	Opposes CE-R14 as the non-complying status of this activity does not suitably recognise the importance of aggregate resources and the way they are spatially located. The term 'quarrying' is not defined but 'quarrying' activity is.	Amend CE-R14 as follows: CE-R14 Quarrying/Mining/Quarrying Activity (excluding for natural hazard mitigation works or reclamation within or adjacent the Port Zone) Activity status: Non-complying Restricted Discretionary Matters of discretion are restricted to: <u>1. the extent to which the proposal results in an increased risk of economic, social or environmental harm;</u> <u>2. whether the proposal includes hazard mitigation;</u> <u>3. measures to avoid, remedy or mitigate adverse effects on areas of Coastal High Natural Character</u> <u>4. the functional need for the mine/quarry to be in this location;</u> <u>5. the extent of any positive benefits that will result from the proposal; and 6. the extent to which the proposal creates natural hazard risks on adjacent properties.</u>
Fulton Hogan Limited	170.33	EW - Earthworks	Rules	EW-R1 Earthworks, excluding earthworks [...]	Opposes having quarrying activities addressed through both the zone rules and earthworks provisions, therefore supports EW-R1. This creates unnecessary duplication and an inconsistent approach through the different provisions.	Retain EW-R1 Earthworks and the explanatory note as notified.
Fulton Hogan Limited	170.34	NOISE - Noise	Objectives	NOISE-O2 Reverse sensitivity	Requests NOISE-O2 is amended to address lawfully established activities.	Amend NOISE- O2 Reverse sensitivity as follows: <i>The Airport, Raceway, State Highway, railway lines and the Port and activities located within commercial, mixed use, <u>rural</u> and Industrial zones, <u>and other lawfully established activities</u> are not constrained by reverse sensitivity effects arising from noise sensitive activities.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fulton Hogan Limited	170.35	NOISE - Noise	Policies	NOISE-P5 Reverse sensitivity	Requests NOISE-P5 is amended to address lawfully established activities.	Amend NOISE-P5 Reverse sensitivity to provide for lawfully established activities, as follows: <i>Require noise sensitive activities located in higher noise environments to be located and designed so as to minimise adverse effects on the amenity values and health and safety of occupants and minimise sleep disturbance from noise, while taking into account:</i> 1. [...] <i>For the purpose of this Policy, higher noise environments include:</i> 1. Commercial and Mixed Use Zones; and 2. Residential zones in close proximity to any General industrial zone and areas within the Port Noise Outer Control Boundary and within that part of the Medium Density Residential Zone and City Centre Zone located within the Port Noise Inner Control Boundary; and 3. locations in close proximity to a State Highway or the railway line.; <u>and</u> 4. <u>in close proximity to lawfully established activities.</u>
Fulton Hogan Limited	170.36	NOISE - Noise	Rules	NOISE-R4 Construction noise	Requests an amendment as per the Auckland Unity Plan to ensure construction in the road does not exceed the noise limits in NZS6803:1999 provided that the works are for less than three nights at any one receiver, provided that noise management is in place. The submitter requests this approach be taken to provide for necessary road works without the need for a resource consent.	Amend Rule NOISE-R4 Construction noise as follows: Activity status: Permitted Where: PER-1 <i>The noise from construction activities undertaken on a site must be measured, assessed, managed and controlled to comply with the requirements of New Zealand Standards NZS 6803:1999 Acoustics - Construction Noise.</i> PER-2 <u>The noise levels specified in PER-1 do not apply to unplanned repair or maintenance works or planned works in the road between the hours of 10pm and 7am where:</u> 1. <u>The number of nights where the noise generated by the works exceeds the relevant noise levels at any one receiver is three nights or less and</u> 2. <u>the works cannot practicably be carried out during the day or because the road controlling authority requires this work to be done at night time; or</u> 3. <u>because of the nature of the works the noise produced cannot be practicably be made to comply with the relevant noise levels; and</u> 4. <u>a construction noise and vibration management plan is provided to the Council no less than five days prior to the works commencing.</u>



Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fulton Hogan Limited	170.37	NOISE - Noise	Rules	NOISE-R12 New noise sensitive activities, alterations to existing buildings for use by a noise sensitive activity or subdivision to accommodate a noise sensitive activity	Considers a new rule is necessary to address new sensitive activities in proximity to lawfully established quarries.	<p>Amend NOISE-R12 New noise sensitive activities, alterations to existing buildings for use by a noise sensitive activity or subdivision to accommodate a noise sensitive activity as follows:</p> <p>[...]</p> <p>3. <u>Within</u></p> <p><u>a. 200m of any lawfully established excavation area</u></p> <p><u>b. 500m of any lawfully established processing area</u></p> <p><u>c. 500m of any activity that involves blasting.</u></p> <p><u>Activity status when compliance not achieved: Discretionary</u></p>
Fulton Hogan Limited	170.38	RELO - Relocated Buildings and Shipping containers	Rules	RELO-R1 Placement of a relocated building	If companies have licensed building practitioners in house, they may be able to undertake the work as envisaged by this rule, but without entering into a contract.	<p>Amend RELO-R1 Placement of a relocated building as follows:</p> <p>2. All zones except the General Industrial Zone and Port Zone</p> <p>Activity status: Controlled</p> <p>Where: CON-1</p> <p>The applicant has entered into a contract with a Licensed Building Practitioner that confirms that within twelve months of the building being located on the site:</p> <p>1. the building will be permanently sited on foundations; and</p> <p>2. any damage to the exterior of the relocated building will be repaired to a tradesman's like manner.</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary						
Fulton Hogan Limited	170.39	RELO - Relocated Buildings and Shipping containers	Rules	RELO-R2 Placement of a shipping container	Opposes this rule that requires a resource consent even where the shipping container is not visible from the road. Managing the effects even where these are not visible does not seem to give effect to policy RELO-P2.	<p>Amend RELO-R2 Placement of a shipping container as follows:</p> <p>[...]</p> <p>2.All zones except the General industrial Zone and the Port Zone</p> <p>Activity Status: Controlled Permitted</p> <p>Where:</p> <p>CON PER-1</p> <p>The shipping container is either:</p> <ol style="list-style-type: none"> located more than 20m from a road boundary; or is not visible from the road; and <p>CON PER --2</p> <p>The maximum total area of all shipping containers on the site does not exceed:</p> <table> <thead> <tr> <th>Site Area</th> <th>Total Area of Shipping Container</th> </tr> </thead> <tbody> <tr> <td><10ha</td> <td>20m²</td> </tr> <tr> <td>>10ha</td> <td>20m²per 10ha of site</td> </tr> </tbody> </table> <p>and</p> <p>CON PER -3</p> <p>There is no stacking of shipping containers.</p> <p>Activity status where compliance is not achieved: Restricted discretionary Controlled</p> <p>The matters of discretion control are restricted to:</p> <ol style="list-style-type: none"> location on the site; and visibly of the shipping container beyond the boundary of the site; and the exterior appearance of the shipping container; and landscaping and screening; and the number of shipping containers on the site and cumulative effects on visual amenity and the character of the area. 	Site Area	Total Area of Shipping Container	<10ha	20m ²	>10ha	20m ² per 10ha of site
Site Area	Total Area of Shipping Container											
<10ha	20m ²											
>10ha	20m ² per 10ha of site											
Fulton Hogan Limited	170.40	GRUZ - General Rural Zone	Objectives	GRUZ-O1 Purpose of the General Rural Zone	Supports GRUZ-O1 as it recognises the role of primary production in the rural landscape.	Retain as notified.						
Fulton Hogan Limited	170.41	GRUZ - General Rural Zone	Objectives	GRUZ-O2 Character and qualities of the General Rural Zone	Supports GRUZ-O2 as it recognises that primary production activities, which are appropriate in the rural environment, may generate noise, odour, light and traffic	Retain as notified.						
Fulton Hogan Limited	170.42	GRUZ - General Rural Zone	Objectives	GRUZ-O3 Protecting primary production	Supports GRUZ-O3 as it recognises that sensitive activities can affect the effectiveness of primary productive activities in the rural zone.	Retain as notified.						


Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fulton Hogan Limited	170.43	GRUZ - General Rural Zone	Objectives	GRUZ-O4 Protecting sensitive activities and sensitive zones	Considers that GRUZ-O4 should acknowledge that quarrying activities, which are anticipated in the rural zones, should not be held to a higher standard than other activities in the zone.	Amend GRUZ -O4 Protecting sensitive activities and sensitive zones as follows: <i>Effects from Intensive primary production, mining, quarrying and other intensive activities generates no or minimal adverse effects on:</i> 1. sensitive activities; and 2. land close to Residential, Rural settlement, Māori Purpose and Open space zones <i>avoid, remedy or mitigate adverse effects.</i>
Fulton Hogan Limited	170.44	GRUZ - General Rural Zone	Objectives	GRUZ-O5 Mining and quarrying	This objective holds quarrying to a higher standard than other activities that are appropriate for the zone.	Amend GRUZ-O5 Mining and quarrying as follows: <i>Mining and quarrying occurs in the General Rural Zone where the resource exists and where it will have no or minimal adverse effects on the sensitive environments and sensitive activities <u>are avoided, remedied or mitigated.</u></i>
Fulton Hogan Limited	170.45	GRUZ - General Rural Zone	Policies	GRUZ-P6 Mining and quarrying activities	The wording of this policy could be better structured to give effect to recognise mining and quarrying are appropriate in the rural zone.	Amend GRUZ-P6 Mining and quarrying activities as follows: 1. Enable small scale quarry activities (up to 2,000m ²), subject to requirements to protect the environment and sensitive activities; 2. Only allow <i>Provide for</i> mining and other quarry activities in the General rural zone where: a. [...]
Fulton Hogan Limited	170.46	GRUZ - General Rural Zone	Rules	GRUZ-R16 Quarries and quarrying activities [...]	The submitter notes that duplication of rules is frustrating and also notes that they appreciate that this rule explicitly does not require a further consent in instances where consent has already been obtained from Environment Canterbury. As noted earlier in this submission, the use of inert fill that does not meet the definition of “cleanfill” as per the National Planning Standards should be included in this rule to avoid unnecessarily limiting the ability to rehabilitate the quarry.	Amend GRUZ -R16 as follows: <i>GRUZ-R16 Quarries and quarrying activities including backfilling with managed fill:</i> [...] GRUZ-R16 Quarries and quarrying activities including backfilling with managed fill: 1. up to 2,000m ² (not in the bed of a river); and 2. in the bed of a river, which is authorised under the Regional Plan either as a permitted activity, or through a resource consent having been obtained from the Canterbury Regional Council Activity status: Permitted Where: PER-1 The quarry is not within 10m of a site boundary; and PER-2 The quarry in not within 50m of a rock art site; and PER-3 The quarry is not located within 500m of an existing sensitive activity located on another site or the boundary of any of the Residential zones, Rural lifestyle zone, Rural settlement zone, Māori Purpose zone or Open Space and recreation zones; and


Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
						PER-4 The Accidental Discovery Protocol commitment form, contained within APP4 - Form confirming a commitment to adhering to an Accidental Discovery Protocol, has been completed and submitted to Council, at least 2 weeks prior to the commencement of any earthworks. Note: any associated building and structure must be constructed in accordance with GRUZ-R13.
Fulton Hogan Limited	170.47	GRUZ - General Rural Zone	Rules	GRUZ-R23 Expansion of existing consented quarries	The policy does not provide for lawfully established un-consented quarries. Considers the term “quarry operation” should be replaced with a defined term and that there is a difference in potential effects between extraction activities and processing, the rule should make this distinction.	<p>Amend GRUZ- R23 as follows:</p> <p>GRUZ-R23 Expansion of existing <u>lawfully established consented</u> quarries.</p> <p>Activity status: Restricted Discretionary</p> <p>RDIS-1 The entirety of the existing quarrying activity operation has an existing land use consent from Timaru District Council <u>or is otherwise lawfully established</u>; and</p> <p>RDIS-2 The expansion of the existing quarry does not increase:</p> <p>a) the rate of production beyond existing <u>lawfully established consented</u> levels, and b) the hours of operation; and</p> <p>RDIS-3 The expansion does not occur within:</p> <p>b) <u>i. 500m for processing activities; and</u> <u>ii. 200m for any excavation activity;</u> of an existing sensitive activity located on another site, or the boundary of a Residential, Rural Lifestyle, Rural Settlement, Māori Purpose or Open Space zone; or b) 20m of a site boundary [...]</p>
Fulton Hogan Limited	170.48	GRUZ - General Rural Zone	Standards	GRUZ-S4 Setbacks for sensitive activities	This standard sets out requirements for where sensitive activities can establish to avoid reverse sensitivity effects.	Retain as notified.


Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fulton Hogan Limited	170.49	GIZ - General Industrial Zone	Rules	GIZ-R1 Industrial activity	Opposes GIZ-R1 as it appears to exclude some activities such as the submitters yard where maintenance and servicing of machinery and plant are conducted.	Amend GIZ-R1 as follows: <i>GIZ-R1 Industrial activity Trade supplier Laboratories Service stations Motor garage Emergency services facilities Veterinary clinics, <u>transport, storage, maintenance, cleaning or repair of goods and vehicles and the hire of commercial and industrial equipment and machinery.</u> Excluding any industrial ancillary activity and offensive trades.</i>
Fulton Hogan Limited	170.50	APP5 - Criteria for Identifying Significant Natural Areas	General	General	Notes that the exposure draft of the National Policy Statement for Indigenous Biodiversity (NPSIB) sets a national framework for assessing Significant Natural Areas. Requests the PDP is consistent with the NPSIB.	Amend APP5 Criteria for Identifying Significant Natural Areas to be consistent with the final form of the National Policy Statement for Indigenous Biodiversity.
Fenlea Farms Limited	171.1	GRUZ - General Rural Zone	General	General	Oppose to any objectives, policies, rules and standards of the GRUZ in relation to the submitter's property at 158 Prattley Road, Timaru and 94 Milford-Clandeboye Road, Timaru because: <ul style="list-style-type: none"> Intensively farmed stock is not expressly authorised within any zone and should be provided for in this zone; Intensively farmed stock should be protected under GRUZ-O3; Intensively farmed stock should be provided as a permitted activity under GRUZ-R1. 	<ol style="list-style-type: none"> Amend GRUZ-R1 to permit primary production, intensive primary production and intensively farmed stock Amend GRUZ-O1 to provide for primary production, intensive primary production and intensively farmed stock Any alternative relief that would address submitters concerns.
Fenlea Farms Limited	171.2	LIGHT - Light	General	General	Opposes, the Light Sensitive Overlay including any objectives, policies, rules, standards and schedules in respect of the overlay that relates to the submitter's property at 158 Prattley Road, Timaru and 94 Milford-Clandeboye Road: <ul style="list-style-type: none"> the extent of the overlay was based on overlays, rather than ecological assessment. the provisions does not account for health and safety associated with ancillary activities to permanent activities and is at odds with LIGHT-P1 and LIGHT-P3. [Refer to original submission for full reason].	<ol style="list-style-type: none"> Amend the approach to Light Sensitive Areas, to one based on ecological evidence, limited accordingly, and develop standards to that determine what a LSA is. Any alternative relief that would address submitters concerns. [Further detailed relief sought in other submissions points on the Lights Chapter and overlay]

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fenlea Farms Limited	171.3	Planning Maps	Light Sensitive Area Overlay		<p>Opposes the inclusion of the submitter's properties in the overlay because:</p> <ul style="list-style-type: none"> the extent of the layer was based on overlays (where some were extensive in area), rather than ecological assessment. The overlay does not account for the critical need for light for health and safety associated with activities within the overlay. <p>[Refer to original submission for full reason].</p>	<p>Delete Light Sensitive Area Overlay from land located at 158 Prattley Road, Timaru and 94 Milford-Clandeboye Road, as per attached maps.</p> <p>OR reduce the extent of the overlay.</p> <p>OR any alternative relief to address these concerns.</p>
						  <p>Figure 1: 158 Prattley Road, Timaru</p> <p>Figure 2: 94 Milford Clandeboye Road, Timaru</p>
Fenlea Farms Limited	171.4	Definitions	Definitions	Light Sensitive Area	<p>Opposes the definition of Light Sensitive Areas by overlays rather than on ecological assessment. The SASM Overlays are expansive and may cover areas where the control of light is unnecessary.</p> <p>[Refer to original submission for full reason].</p>	<p>Amend the approach to Light Sensitive Areas, to one based on ecological evidence and limited accordingly and develop standards to that determine what a LSA is.</p> <p>OR any alternative relief that would address concerns.</p>
Fenlea Farms Limited	171.5	Definitions	Definitions	Outdoor Lighting	<p>Opposes the definition of outdoor lighting as it is broad and is unclear whether this applies to fixed or unfixed lighting.</p>	<ol style="list-style-type: none"> Amend the Definition of Outdoor Lighting to clarify whether the lighting identified is fixed and/or unfixed. Any alternative relief that would address concerns.
Fenlea Farms Limited	171.6	Definitions	Definitions	Significant Natural Area or SNA	<p>Opposes that the definition of Significant Natural Area refers to an incorrect SCHED number.</p>	<p>Amend the definition of Significant Natural Area to include the correct SCHED number, being SCHED7.</p>
Fenlea Farms Limited	171.7	LIGHT - Light	Policies	LIGHT-P1 Appropriate	<p>Opposes LIGHT-P1 as it should exempt artificial lighting required for health and safety reasons, ancillary activities to permanent activities.</p>	<ol style="list-style-type: none"> Amend LIGHT-P1 to ensure that artificial outdoor lighting is not restricted when it is necessary for health and safety. Any alternative relief that would address concerns.
				artificial outdoor lighting		

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fenlea Farms Limited	171.8	LIGHT - Light	Rules	LIGHT-R2 Outdoor artificial lighting for health and safety	Opposes LIGHT-R2 PER-2 as it does not account for permanent activities or existing uses that require artificial lighting in the ordinary course of business to protect the health and safety of stock/plant/personnel and is at odds with LIGHT-P1. Additionally, PER-3 is at odds with policy LIGHT -P3. [Refer to original submission for full reason].	Amend LIGHT-R2 - Outdoor artificial lighting for health and safety to: 1. Provide for outdoor artificial light for health and safety as a permitted activity for an ancillary activity to a permanent activity that occurs on site; 2. Amend PER-3 to clearly be not applicable to lighting required for health and safety (including for ancillary activities to permanent activities occurring at the site). 3. Any alternative relief that would address the submitters concerns and enable farming operations to continue with necessary lighting.
Fenlea Farms Limited	171.9	LIGHT - Light	Rules	General	Oppose Table 22 and 23 and Figure 18 together with any other rules and standards relating to lighting standards, illuminance levels, increment and acceptable/unacceptable lighting because the limitations in these tables and figures are not practical, in particular: <ul style="list-style-type: none"> • Opposes Table 22 which limits illuminance levels to times between 7am-10pm and prescribes low lux levels. These times and lux levels cannot be achieved when undertaking ancillary activities to permanent activities such as farming, where emergency clearance of stock may be required past 10pm. • Opposes Table 23 as it limits acceptable levels of Increment. • Opposes Figure 18 as the examples of acceptable fixtures are limited, and must all be fully shielded, this is not practicable for farming operations, where flood lights or other exposed lighting might be required to safely operate the permanent activity. 	1. Removal of illuminance time restrictions in Table 22; 2. Removal of illuminance time restrictions in Table 22 insofar as they relate to matters of health and safety (including ancillary activities to permanent activities that occur on site) 3. Limits on acceptable illuminance levels, increment, and acceptable/unacceptable lighting be removed for matters of health and safety for an ancillary activity of a permanent activity that occurs on site. 4. Any alternative relief that would address Fenlea Farm's concerns, and enable farming operations to continue with necessary lighting.
Fenlea Farms Limited	171.10	PA - Public Access	General	General	Oppose the approach to Public Access including any objectives, policies and rules, standards and schedules in respect of the overlay relating to 158 Prattley Road. [Refer original submission for full reason]	As detailed in other submission points relate to the Public Access chapter.
Fenlea Farms Limited	171.11	SCHED11 - Schedule of Public Access Provisions	SCHED11 - Schedule of Public Access Provisions	Prattley Road Lagoon System	Opposes the inclusions of the Prattley Road Lagoon System within 158 Prattley Road within SCHED11-Schedule of Public Access. Historic unauthorised access caused damage to native habitats, including a penguin colony which has since left the area. It also disrupted farming operations and any such access would expose the public to health and safety risks. [Refer to original submission for full reason].	1. Amend SCHED11 to delete the Prattley Road Lagoon System; 2. Amend SCHED11 to exclude any portions of the Prattley Road Lagoon System contained within 158 Prattley Road 3. Any alternative relief that would address the submitters concerns and prevent public access over the Prattley Road Lagoon System within 158 Prattley Road.
Fenlea Farms Limited	171.12	Planning Maps	Public Access Provision overlay	Prattley Road Lagoon System	Opposes the inclusions of the Public Access Provision notation over 158 Prattley Road on the planning maps. Historic unauthorised access caused damage to native habitats, including a penguin colony which has since left the area. It also	1. Delete the Prattley Road Lagoon System from the Public Access Provisions Overlay ; 2. Exclude any portions of the Prattley Road Lagoon System contained within 158 Prattley Road; 3. Any alternative relief that would address the submitters concerns.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
					disrupted farming operations and any such access would expose the public to health and safety risks. [Refer to original submission for full reason].	
Fenlea Farms Limited	171.13	PA - Public Access	Objectives	PA-O1 Public Access	Opposes PA-O1 as public access is only to be “restricted where desirable”, this is at odds with PA-P4 and does not account for the restrictions on public walking access set out in policy 19(3) of the Coastal Policy Statement. It also does not recognise situations where protection from public access is required to protect sensitive indigenous species and habitats, and public health and safety. Temporary suspensions, such as during lambing/calving are also not covered.	<ol style="list-style-type: none"> 1. Amend PA-O1 - Public Access to limit public access where it is a matter of health and safety and preservation of sensitive indigenous species and habitats, and to account for periods where public access should be temporarily suspended; 2. Any alternative relief that would address the submitters concerns.
Fenlea Farms Limited	171.14	CE - Coastal Environment	General	General	Oppose any objectives, policies, rules, standards and schedules in respect of the Coastal Environment Overlay relating to 158 Prattley Road. See detailed submissions on specific provisions later.	<p>See detailed submissions made on specific provisions later. 158 Prattley Road is outlined below.</p> 
Fenlea Farms Limited	171.15	CE - Coastal Environment	General	General	Opposes the objective, policies, rules, standards and schedules in relation to the Sea Water Overlay in relation to 158 Prattley Road. The approach is opposed as there are no objectives and limited policies that set out the purpose of this overlay. There is no definition or criteria for what land should be included within the Overlay, and accordingly why 158 Prattley Road has been included within it. There are limitations on building size and subdivision, maximum ground level.[Refer to original submission for full reason].	<ol style="list-style-type: none"> 1. Delete the Sea Water inundation Overlay from 158 Prattley Road, as per attached map. 2. Amend the Planning Maps to reduce the extent of the Overlay on 158 Prattley Road, as per attached map. 3. amendment of objectives and policies to refer to this overlay 4. Any alternative relief that would address the submitters concerns.



Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
						 <p data-bbox="1792 825 2110 848">Figure 1: 158 Prattley Road, Timaru</p>
Fenlea Farms Limited	171.16				Submission point deleted due to duplication, refer submission point 171.15.	Refer submission point 171.15.
Fenlea Farms Limited	171.17	CE - Coastal Environment	General	General	<p data-bbox="1077 1688 1789 1787">Oppose any objectives, policies, rules, standards and schedules in respect of the Coastal High Natural Character Area Overlay relating to 158 Prattley Road.</p> <p data-bbox="1077 1801 1665 1835">See detailed submissions on specific provisions later.</p>	<ol data-bbox="1789 1688 2896 1879" style="list-style-type: none"> 1. Delete the Coastal High Natural Character Area Overlay off 158 Prattley Road, as per attached map. 2. Amend the Planning Maps to reduce the extent of the Overlay on 158 Prattley Road, as per attached map. 3. Any alternative relief that would address the submitters concerns.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
						 <p data-bbox="1795 997 2122 1024">Figure 1: 158 Prattley Road, Timaru</p>
Fenlea Farms Limited	171.18				Submission point deleted due to duplication, refer submission point 171.17.	Refer submission point 171.17.



Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fenlea Farms Limited	171.19	Definit ions	Definit ions	Urban Area	Submitter noted that the Urban Areas are defined as ‘the boundaries of a town with a population of 1000 or more is unclear’. Considers it is unclear what rules apply to the submitter’s properties that are within Temuka but are not situated in Temuka proper.	Clarification of the boundaries of urban areas by way of mapping on the Planning Maps.
Fenlea Farms Limited	171.20	CE - Coastal Environment	Objectives	CE-O6 Existing urban activities	Opposes CE-O6 as it does not protect existing rural activities.	<ol style="list-style-type: none"> 1. Amend CE-O6 Existing urban activities to recognise existing rural activities and to provide for these activities or inclusion of a new objective; 2. Any alternative relief that would address the submitters concerns.
Fenlea Farms Limited	171.21	CE - Coastal Environment	Policies	CE-P10 Preserving the natural character of the Coastal Environment	Opposes CE-P10 as intensive farming can be managed appropriately within a coastal environment through matters of control or discretion and should not be automatically non-complying.	<ol style="list-style-type: none"> 1. Amend CE-P10 Preserving the natural character of the Coastal Environment as follows: <i>Enable subdivision, use and development outside of areas of coastal high natural character that:</i> <ol style="list-style-type: none"> 1. <i>avoids significant adverse effects; and</i> 2. <i>avoids, remedies or mitigates any other adverse effects on the qualities that contribute to the natural character of the Coastal Environment; while recognising that:</i> <ol style="list-style-type: none"> a. <i>in rural zoned areas, buildings and structures for non-intensive primary production and residential activities may be appropriate depending on their size, scale and nature;</i> 2. Any alternative relief that would address the submitters concerns.
Fenlea Farms Limited	171.22	CE - Coastal Environment	Policies	CE-P11 Preserve the natural character qualities of areas with Coastal High Natural Character	Opposes CE-P11 as it does not recognise that a number of activities may be appropriate depending on their size, scale and nature. [Refer to original submission for full reason].	<ol style="list-style-type: none"> 1. CE-P11 (2) Preserve the natural character qualities of areas with Coastal High Natural Character extended to include in “rural zoned areas, buildings and structures for primary production (including intensively farmed stock) and residential activities may be appropriate depending on their size, scale and nature. 2. Any alternative relief that would address the submitters concerns.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fenlea Farms Limited	171.23	CE - Coastal Environment	Rules	CE-R4 Buildings and structures and extensions (excluding Regionally Significant Infrastructure and fences)	<p>Oppose CE-R4.3 with any standards as to the height of buildings and structures, site coverage and building and structure external materials.</p> <p>Oppose CE-R4.4 and CE-R4.5 including any definitions that relate to the application of these rules as it relates to 158 Prattley Road.</p> <p>In particular:</p> <ol style="list-style-type: none"> 1. Opposes CE-R4.3.1 within the Coastal High Natural Character Overlay as it unnecessarily limits maximum ground floor areas and where unable to meet the permitted activity rule, the activity will be a non-complying activity. The submitter considers it is more appropriate for buildings/extensions to meet ground floor levels, obtain Flood Risk Certificates, or meet other specific built form standards, and this should be sufficient protection. The status of non-complying is unnecessary. 2. Opposes CE-R4.4 and CE.R4.5 relating to Sea Water Inundation Overlay within urban areas and outside of urban areas respectively. Objective CE-O6 seeks to ensure ongoing activities in the Coastal environment and this rule stands in the way of this. Owners of rural properties look to develop and improve efficiency in farming operations and a maximum ground floor limit of 25m² for 10 years does not recognise the nature of business or farming operations. PER-2 does not allow extensions or new buildings that accommodate a 	<p>Amend CE-R4.3 Buildings and structures and extensions (excluding Regionally Significant Infrastructure and fences) to achieve the following:</p> <ol style="list-style-type: none"> 1. Under CE-R4.3 Coastal High Natural Character Overlay: <ol style="list-style-type: none"> 1. Remove the maximum ground floor areas for new buildings or extensions within and outside urban areas on the basis there are sufficient alternative protections in place; 2. Include built form standards for buildings within the overlay; 3. Amend so that failure to meet the permitted activity rule results in a controlled activity; 2. Under CE-R4.4. Sea Water Inundation Overlay within urban areas: <ol style="list-style-type: none"> 1. Remove maximum ground floor areas for new buildings or extensions (PER-1) on the basis there are sufficient alternative protections in place; 2. Remove the 10-year period out in PER-1; 3. significantly reduce the 10-year period set out in PER-1; 4. Amend the CE-R4.4 to permit buildings with one or more habitable rooms. 3. Under CE-R4.5 Sea Water Inundation Overlay outside of urban areas: <ol style="list-style-type: none"> 1. Remove maximum ground floor areas for new buildings or extensions (PER-1) on the basis there are sufficient alternative protections in place; 2. Remove the 10-year period out in PER-1; 3. Significantly reduce the 10-year period set out in PER-1; 4. Amend CE-R4.5 impose a restricted discretionary activity status if unable to meet the permitted activity rule on the basis that the same matters of discretion contained in CE-R4.4 can be applied to areas outside urban areas; 5. Amend CE-R4.5 to permit buildings with one or more habitable rooms.
					<p>natural hazard sensitive activity, which prevents the construction of any habitable dwellings.</p> <p>[Refer to original submission for full reason]</p>	<p>4. Any alternative relief that would address the submitters concerns.</p> <p>[Note no specific relief sought on related definitions.]</p>
Fenlea Farms Limited	171.24	CE - Coastal Environment	Rules	CE-R5 Earthworks, excluding: earthworks for natural hazard mitigation works; and any land disturbance	<p>Opposes CE-R5 as it limits the volume of earthworks for permitted activity and does not recognise pre-existing rural activities which may already involve a greater level of earthworks. The submitter considers the activity status when compliance is not achieved should be controlled on the basis that the Timaru District Council can effectively manage earthworks within this area with restricted discretion.</p> <p>[Refer to original submission for full reason].</p>	<p>Amend CE-R5 with the following changes:</p> <ol style="list-style-type: none"> 1. The permitted earthworks within this rule be increased from 100m³ and 100m² to at least 2000m³ and 2000m² 2. The activity status when compliance cannot be achieved under this rule is changed from Discretionary to Controlled. 3. Any alternative relief that would address the submitters concerns.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fenlea Farms Limited	171.25	CE - Coastal Environment	Rules	CE-R11 Subdivision	Oppose CE-R11 within the Sea Water Inundation Overlay, Matters of Discretion 3. as this restriction is likely to impact the erection of habitable dwellings in connection with existing urban or non-urban purposes within this overlay which should be permitted on the basis that built form standards are met. It should also refer to existing rural activities.	<ol style="list-style-type: none"> 1. Delete CE-R11.1.MOD3 Subdivision in Sea Water Inundation Overlay [NB from TDC - there is a numbering error in this Plan rule] 2. Any alternative relief that would address the submitters concerns.
Fenlea Farms Limited	171.26	CE - Coastal environment	Rules	CE-R13 Primary Production not otherwise specified in this chapter	Opposes CE-R13 as rules relating to farming, nutrients and water application are for the Canterbury Regional Council and are contained in the Canterbury Land and Water Plan. Primary production, including irrigation and intensive primary production can be managed under the regional rules. The policies contained in CE-P11 can be achieved by proper management of intensively farmed stock. [Refer to original submission for full reason].	<p>Amend CE-R13 Primary Production not otherwise specified in this chapter in Coastal High Natural Character Area Overlay to:</p> <ol style="list-style-type: none"> 1. Provide for Primary production including intensively farmed stock as a permitted activity within this overlay; 2. Amend CE-R13 so it does not exclude irrigation or intensive primary production; 3. Provide primary production (including intensively farmed stock) as a controlled activity; 4. Any alternative relief that would address the submitters concerns.
Fenlea Farms Limited	171.27	SASM - Sites and Areas of Significance to Māori	General	General	Opposes the Sites and Areas of Significance to Māori Overlay, including any objectives, policies, rules, standards and schedules in respect to the submitters properties. These overlays contain some very restrictive rules, and it is not appropriate to apply these equally across expansive areas, which have their own natural characteristics and existing uses and it is unclear how these boundaries have been arrived at. [Refer to original submission for full reason]	See detailed submissions made on specific provisions later.
Fenlea Farms Limited	171.28	Planning Maps	SASM Overlay		Opposes the extent of the overlays over the Properties. The SASM boundaries are expansive and it is unclear how these have been determined. These overlays contain some very restrictive rules, and it is not appropriate to apply these equally across expansive areas, which have their own natural characteristics and existing uses. [Refer to original submission for full reason].	<ol style="list-style-type: none"> 1. Delete the SASM Overlays off land located at 158 Prattley Road, Timaru, 94 Milford-Clandeboyne Road, as per attached maps; 2. Reduce the extent of the SASMs on 158 Prattley Road, Timaru, 94 Milford-Clandeboyne Road; 3. Delete SASM-4B from 158 Prattley Road, Timaru, 94 Milford-Clandeboyne Road; 4. Reduce the extent of SASM-4B from the properties; 5. Any alternative relief to address these concerns.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
						  <p data-bbox="1792 823 2107 846">Figure 1: 158 Prattle Road, Timaru</p> <p data-bbox="2445 823 2849 846">Figure 2: 94 Milford Clandeboye Road, Timaru</p>
Fenlea Farms Limited	171.29	SASM - Sites and Areas of Significance to Māori	Policies	General	The submitter accepts the policies of this chapter focus on the protection of SASM. However, the submitter considers policies should contemplate health and safety, and existing use of land subject to SASMs and the protection of those activities.	<ol style="list-style-type: none"> 1. Amend SASM-P4 Cultural access to focus on the grant of safe access and to recognise the impact of access on existing rural activities; 2. Amend Policies to recognise that an adverse effect of the activities should not negatively impact existing uses of the affected land; 3. Any alternative relief that would address the submitters concerns.
Fenlea Farms Limited	171.30	SASM - Sites and Areas of Significance to Māori	Policies	SASM-P8 Protection of wāhi taoka, wāhi tapu, wai taoka and wai tapu sites and areas	Oppose SASM - P8 as this policy does not recognise existing uses of land. 'Functional needs associated with an activity' may not enable an existing activity to be efficiently carried out. Activities within these overlays can be effectively managed with matters of control or discretion.	<ol style="list-style-type: none"> 1. Amend SASM-P8 to recognise existing rural use of sites within the SASM overlays. 2. Amend SASM-P8 as follows: SASM-P8 Protection of wāhi taoka, wāhi tapu, wai taoka and wai tapu sites and areas <i>Where an activity is proposed within any of the wāhi taoka sites, wāhi tapu sites, wai taoka areas and wai tapu areas listed in SCHED6 - Schedule of Sites and Areas of Significance to Kāti Huirapa, ensure that:</i> [...] 3. any adverse effects on identified values are avoided unless it can be demonstrated that: <ol style="list-style-type: none"> a. due to the are for the functional needs of the activity, it is not possible to avoid all adverse effects; and b. any residual effects that cannot be practicably avoided are mitigated, as far as possible, in a way that protects, maintains or enhances the overall values of the site or area; and c. where any historical loss of values can be remediated; 3. Any alternative relief that would address the submitter's concerns.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fenlea Farms Limited	171.31	SASM - Sites and Areas of Significance to Māori	Rules	SASM-R6 Intensively farmed stock	<p>Opposes SASM-R6 as Intensively farmed stock can be adequately managed through matters of control and discretion and a more appropriate process for approval should be provided (i.e., not deemed a non-complying activity within wāhi taoka, wāhi tapu, and wai tapu overlays with objectives and policies that seek avoidance and protection over continued use).</p> <p>It is appropriate for the Proposed Plan to recognise the existing activities within the district, and the impact of the restrictions imposed by these overlays and rules on the economic position of farmers would have to be justified.</p> <p>Imposing an activity of non-compliance if the permitted activity rules cannot be met, does not allow a person to demonstrate appropriate management of an activity can achieve SASM-P8, this opportunity can be provided if the activity was controlled. Accordingly, it is more appropriate for this to be a controlled or discretionary activity.</p> <p>[Refer to original submission for full reason].</p>	<ol style="list-style-type: none"> 1. Amend SASM-R6 Intensively farmed stock by deleting SASM-R6.2. 2. Amend the activity status from Non-complying to Controlled. 3. Any alternative relief that would address the submitters concerns.
Fenlea Farms Limited	171.32	ECO - Ecosystems and Indigenous Biodiversity	General	General	<p>Opposes any objectives, policies, rules, standards and schedules relating to the Significant Natural Areas overlay on properties at 158 Prattley Road and 94 Milford Clandeboye Road.</p> <p>There is no ECO-SCHED2 to the Proposed Plan, and it is unclear whether this is to be read together with SCHED7 – Schedule of Significant Natural Areas</p>	ECO-SCHED2 be made available or reference corrected to SCHED7 if included in error.
Fenlea Farms Limited	171.33	NH - Natural Hazards	General	General	Oppose together with any objectives, policies, rules, standards and schedules in respect of the Flood Assessment Areas overlay relating to the submitter's Properties.	<ol style="list-style-type: none"> 1. Amend the Flood Assessment Areas overlay as detailed in later point; 2. Amend NH-S2 as detailed in later point; 3. introduction of a rule that earthwork limits; 4. any alternative relief that would address the submitter's concerns.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Fenlea Farms Limited	171.34	Planning Maps	Flood Assessment Area Overlay		The Flood Assessment Area Overlay covers the Properties which are both used for primary production purposes. Farming activities, and natural hazard mitigation activities (such as maintenance of stopbanks) can involve significantly more than 2,000m ² in earthworks.	<p>1. Delete the Flood Assessment Area Overlay off land located at 158 Prattley Road, Timaru and 94 Milford-Clandeboyne Road, as per attached maps;</p> <p>2. Reduce the extent of the overlay on these properties;</p>   <p>Figure 1: 158 Prattley Road, Timaru</p> <p>Figure 2: 94 Milford Clandeboyne Road, Timaru</p>
Fenlea Farms Limited	171.35	NH - Natural Hazards	Standards	NH-S2 Volume of earthworks	The Flood Assessment Area Overlay covers the Properties which are both used for primary production purposes. Farming activities, and natural hazard mitigation activities (such as maintenance of stopbanks) can involve significantly more than 2,000m ² in earthworks.	Amend NH-S2 to increase the permitted earthworks volumes in the Rural Zones within the Flood Assessment Areas overlay year under NH-S2.2. from 2,000m ² to 2,500m ² or more.
Silver Fern Farms	172.1	Definitions	Definitions	Hazardous facility	Supports the inclusion of this definition as it enables rules in the Hazardous Substances chapter to be operationalised.	Retain as notified.
Silver Fern Farms	172.2	Definitions	Definitions	High Hazard Area	Given the implications for consenting, clarification is sought as to whether reference in this definition to "inundation" means land in the Sea Water Inundation Overlay will also be subject to the High Hazard Overlay	<p>1. Amend the definition of High Hazard Overlay;</p> <p>OR</p> <p>2. clarify the various hazard overlays, to confirm the implementation of this definition.</p>
Silver Fern Farms	172.3	Definitions	Definitions	Industrial activity	It is appropriate for the definition to align with the National Planning Standards 2019.	Retain as notified.
Silver Fern Farms	172.4	Definitions	Definitions	Industrial and Trade Waste	It is appropriate to define Industrial and Trade Waste to exclude sewage and greywater in order to implement differentiated consenting pathways for the management of these substances.,	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.5	Definitions	Definitions	Intensive Outdoor Primary Production	The submitter seeks to ensure that the supplementary feeding of stock being temporarily held at a meat processing plant is not inadvertently defined as 'Intensive Outdoor Primary Production'. Otherwise, a non-complying activity status under Rule GIZ-R5 would inappropriately apply.	Amend the definition of Intensive Primary Production as follows: <i>INTENSIVE OUTDOOR PRIMARY PRODUCTION</i> [...] <i>e. the feeding of supplementary feed during adverse weather events such as drought or snow <u>or while stock are temporarily held prior to processing.</u></i>
Silver Fern Farms	172.6	Definitions	Definitions	Intensively farmed stock	The submitter seeks to ensure that stock being held for processing purposes should not be considered 'Intensively Farmed Stock' and the supplementary feeding of stock being held temporarily should not be defined as 'Intensive Outdoor Primary Production'. [refer original submission for full reasons]	Amend the definition of Intensively farmed stock as follows: <i>INTENSIVELY FARMED STOCK means:</i> [...] <i>d. any stock that is associated with an intensive primary production <u>(excluding stock held for processing).</u></i>
Silver Fern Farms	172.7	Definitions	Definitions	Light Sensitive Area	The definition simply lists land affected by the Light Sensitive Area Overlay but does not explain the meaning for the term. Amendments are sought to specify exactly which land cannot be defined as an "Light Sensitive Areas", OR refer in the definition to the "mapped" Light Sensitive Areas.	Amend the definition of Light Sensitive Areas to ensure the meaning of the term is expressed clearly and if specified in the definition, the spatial coverage of the overlay is represented more precisely.
Silver Fern Farms	172.8	Definitions	Definitions	Major Hazard Facility	Considers that it is appropriate to define Major Hazard Facilities in order to operationalise the policies and rules (including those relating to the protection of facilities from reverse sensitivity effects) later in the proposed Plan.	Retain as notified.
Silver Fern Farms	172.9	Definitions	Definitions	Noise sensitive activity	Considers it is appropriate to define these activities in order to implement the provisions of the Noise chapter, including the required mitigation of noise from industrial zones and activities.	Retain as notified.
Silver Fern Farms	172.10	Definitions	Definitions	Reverse sensitivity	Considers the definition is too narrowly focused on "existing lawfully established activity" and it should be expanded to address consented but unimplemented activities, and	Amend the definition of Reverse Sensitivity as follows: <i>REVERSE SENSITIVITY means the potential for the operation of an <u>existing-permitted, consented or lawfully established activity, and the future development or expansion of that activity</u> to be compromised, constrained, or curtailed by the more-recent <u>possible or proposed</u> establishment,</i>
					permitted activities as these are part of the permitted baseline and it would accord with the intent of the approach to include. [refer original submission for full reasons]	<i><u>intensification</u> or alteration of another activity which may be sensitive to the actual, potential or perceived adverse environmental effects generated by an-existing <u>that</u> activity.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.11	Definitions	Definitions	Sensitive activity	The submitter seeks an amendment to exclude seasonal workers accommodation and caretaker dwellings from the definition as seasonal workers accommodation and caretaker dwellings are sometimes established on industrial sites. The references in (a) and (b) of the definition also require re-numbering and rationalisation.	Amend definition of Sensitive Activity as follows: <i>SENSITIVE ACTIVITY</i> means: 1. Residential activities <u>(excluding seasonal workers accommodation and caretaker dwellings)</u> ; 2. [...] AND Correct the references in (a) and (b).
Silver Fern Farms	172.12	SD - Strategic Direction	Objectives	SD-O1 Residential Areas and Activities	Considers that the fundamental land use planning issue of separation between incompatible uses should be expressed in this objective.	Amend SD-O1 as follows: SD-O1 Residential Areas and Activities [...] <u>iv. The location of new residential areas and activities avoids creating conflict with incompatible zones and activities.</u>
Silver Fern Farms	172.13	SD - Strategic Direction	Objectives	SD-O2 The Natural and Historic Environment	Considers this objective restates parts of s.5 and s6 RMA and therefore its value is unclear. The use of “important” landscapes and features, is inconsistent with “outstanding” natural features and landscapes as per s.6 RMA.	Amend SD-O2 The Natural and Historic Environment to provide meaningful direction beyond simply restating Part 2 of the RMA and to apply thresholds of ‘protection’ that accord with Part 2.
Silver Fern Farms	172.14	SD - Strategic Direction	Objectives	SD-O4 Natural Hazards	Considers that as drafted (iii) could be interpreted as requiring natural hazard mitigation by landowners regardless of any triggering proposal or event. Considers that the mitigation is only necessary to facilitate an activity.	Amend SD-O4 as follows: SD-O4 Natural Hazards [...] <u>iii. for other areas, natural hazards risks are appropriately mitigated if necessary to enable a land use, development or subdivision.</u>
Silver Fern Farms	172.15	SD - Strategic Direction	Objectives	SD-O6 Business Areas and Activities	Considers the objective should recognise industry, given the importance of the sector to the district’s economy. It should also reiterate the principle of separation between incompatible activities.	Amend SD-O6 as follows: SD-O6 Business areas and Activities <i>Business and economic prosperity in the District is enabled in appropriate locations, including by:</i> i. providing sufficient land for a range of business <u>and industrial</u> activities to cater for projected growth; ii. providing opportunities for a range of business activities to establish and prosper, provided that commercial activities outside of commercial areas are limited so- they do not detract from the role and function of the City Centre and Town Centre zones <u>or the viability of industrial zones.</u> iii. <u>Avoiding the encroachment of incompatible activities that are sensitive to the effects of commercial and industrial activities.</u>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.16	SD - Strategic Direction	Objectives	SD-09 Rural Areas	Considers the objective should recognise activities that support primary production, lest it be constructed in an inappropriately restrictive manner. Also considers that the burden of mitigation falls to new sensitive activities locating in the rural environment, not already established rural activities. And that maintenance will not always be practicable or desirable, given the land use composition of areas changes over time.	Amend SD-09 as follows: SD-09 Rural Areas A range of primarily Primary production and supporting activities are enabled in the rural environment to enable the ongoing use of land for primary production for present and future generations; while: i. protecting versatile soils for productive uses; ii. managing the adverse effects of intensive activities on <u>existing</u> sensitive activities; iii. managing the adverse effects of new sensitive activities on primary production, <u>rural industry and supporting activities</u> ; iv. avoiding activities that have no functional/operational need to locate in the rural area; v. identifying and maintaining <u>managing</u> the character, qualities and amenity values of rural areas; vi. [...]
Silver Fern Farms	172.17	UFD - Urban Form and Development	Objectives	UFD-O1 Settlement Patterns	Seeks minor amendments to ensure that the avoidance clauses are appropriately focussed.	Amend UFD-O1 as follows: UFD-O1 Settlement patterns A consolidated and integrated settlement pattern that: [...] vi. avoids <u>significant adverse effects on</u> areas with important natural, cultural and character values; [...] ix. avoids locating new growth in areas where the impacts from natural hazards are unacceptable <u>and natural hazard risk cannot be acceptably mitigated or which would require additional hazard mitigation</u> ; and x. controls the location of activities, primarily by zoning, to minimise conflicts between incompatible activities and avoid these where there may be significant adverse effects.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172. 18	SW - Stormwater Management	Section B: Activities in the General Industrial Zone, Port Zone and Open Space and Recreation zones	SW-R4 All developments, other than a road, that result in an increase in impervious surfaces of greater than 30m2 , excluding stormwater discharges that are authorised by a resource consent from the Canterbury Regional Council	Considers that while it is appropriate to provide for onsite stormwater disposal as Restricted Discretionary, the rule appears to inappropriately anticipate stormwater devices being maintained. Typically, consent conditions would require maintenance.	Amend SW-R4 as follows: SW-R4 All developments [....] [....] Activity status when compliance not achieved: Restricted Discretionary Matters of discretion are restricted to: <ol style="list-style-type: none"> 1. the extent to which design, location, capacity, type and construction... 2. [....] 3. The consequences of a lack of maintenance of the stormwater neutrality device; and 4. [....]
				pursuant to the relevant regional plan		
Silver Fern Farms	172.19	CL - Contaminated Land	Introduction	General	Supports the approach to only provide objective and policy direction for the assessment of resource consent applications under the NESCS. Also supports the reference to the NESCS without including additional rules to manage the effects of contaminated land on land use changes and human health.	Retain as notified.
Silver Fern Farms	172.20	CL - Contaminated Land	Objectives	CL-O1 Management of contaminated land	Considers the objective implies that contaminated land should be made safe for its intended use, before any land disturbance. The objective should recognise that land disturbance is often part of the site remediation prior to a change of use. Supports CL-P3.	Amend CL-O1 as follows: CL-O1 Management of contaminated land <i>Contaminated land is made safe for human health and its intended use before any change of use, land disturbance, development or subdivision.</i>
Silver Fern Farms	172.21	CL - Contaminated Land	Policies	CL-P2 Subdivision, use and development of contaminated land	Considers that the use of 'best practice' implies there is a hierarchy of approaches or options to contaminated land management. Instead the submitter considers the policy focus should be to require site management in accordance with accepted procedures codified in standards such as the Ministry for the Environment's 'Contaminated land management guidelines'.	Amend CL-P2 Subdivision, use and development of contaminated land to replace the phrase 'best practice' with a reference to the particular guidelines or procedural manual that applications will be assessed against.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.22	NH - Natural Hazards	Objectives	NH-O1 Areas subject to natural hazards	Considers it is inappropriate not to provide for mitigation as an approach to managing activities in high natural hazard areas. Also considers that objective NH-O1 is inconsistent with RPS directions that contemplate risk mitigation in areas of natural hazard risk. {refer to original submission for full reasons}	Amend NH-O1 as follows: NH-O1 Areas subject to natural hazards <i>Risk to human life and significant risk to property, from natural hazards is <u>avoided in high hazard areas or mitigated to an acceptable level.</u></i> 1. avoided in high hazard areas; and 2. avoided or mitigated elsewhere to an acceptable level.
Silver Fern Farms	172.23	NH - Natural Hazards	Objectives	NH-O3 Natural hazard mitigation works	Considers it is necessary to allow the exercise of discretion as to the use of buffers and natural features, particularly where there is existing development.	Amend NH-O3 as follows: NH-O3 Natural hazard mitigation works <i>Natural hazard mitigation works reduce risks to people and property, with a preference for the use of natural features and buffers <u>wherever appropriate.</u></i>
Silver Fern Farms	172.24	NH - Natural Hazards	Policies	NH-P1 Identification of natural hazards and approach to management within Natural Hazard Areas	Considers this policy does not expressly reflect the obligation of RMA s75(3)(c) for district plans to give effect to regional policy statements.	Amend NH -P1 Identification of natural hazards and approach to management within natural Areas to include reference to aligning mapping of natural hazards with that of the Canterbury RPS.
Silver Fern Farms	172.25	NH - Natural Hazards	Policies	NH-P4 Subdivision, use and development in Flood Assessment Areas, excluding high hazard areas and overland flow paths	The submitter's site is included in the Major Hazard Facility overlay as SHF-14 but is not listed in SCHED2 - Schedule of Major Hazard Facilities, as such, it is unclear if Major Hazard Facility provisions apply to the site. If the provisions do apply, it could be that some buildings at the submitters site in Pareora are affected despite not containing hazardous substances. Additionally, the submitter considers amendment is required to avoid undue regulation simply because a building is in a Flood Assessment Area.	Amend NH-P4 as follows: NH-P4 Subdivision, use and development in Flood Assessment Areas, excluding high hazard areas and overland flow paths [...] <i>5. <u>buildings within</u> major hazard facilities <u>containing hazardous substances</u> will not be inundated;</i> <i>and</i> [....]
Silver Fern Farms	172.26	NH - Natural Hazards	Policies	NH-P5 Subdivision and Regionally significant infrastructure in Liquefaction Awareness Areas	Supports the policy as it provides for subdivision that avoids or mitigates risk in the Liquefaction Awareness Areas Overlay.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.27	NH - Natural Hazards	Policies	NH-P9 Natural hazard mitigation works	It appropriate to provide for private natural hazard mitigation works subject to the criteria specified in this policy. A minor amendment to clause (2)(d) is sought to recognise that changes to the flood risk profile may be acceptable in some cases. For example where the increased flood risk is outweighed by the benefit of the project.	Amend NH-P9 as follows: NH-P9 Natural hazard mitigation works <i>Natural hazard mitigation works:</i> [...] 2. not undertaken by the Crown, Canterbury Regional Council or the Council, will only be acceptable where: [...] d. the construction or operation of the works will <u>avoid or acceptably mitigate</u> not lead to any increased or new risk from flooding to human life and property.
Silver Fern Farms	172.28	NH - Natural Hazards	Policies	NH-P10 High Hazard Areas	Considers the unqualified avoidance policy setting is not appropriate as it may be acceptable to lose some structures e.g. a fence. Also considers that all high hazard areas need to be mapped, so the policy direction can be implemented at a consenting level.	Amend NH-P10 as follows: NH-P10 High Hazard Areas <i>Avoid subdivision, use and development (excluding Regionally Significant Infrastructure) in, mapped or identified High Hazard Areas, unless:</i> 1. it is a building that is not a natural hazard sensitive activity or is unlikely to suffer damage; or 2. it can be demonstrated that the risks of the natural hazard can be mitigated so that: a. in the event of a natural hazard, there is likely to be no loss of life or serious injury or and any built development is not likely to suffer significant <u>property</u> damage or loss; and [...]
Silver Fern Farms	172.29	NH - Natural Hazards	Rules	NH-R1 Earthworks, excluding land disturbance and for natural hazard mitigation works	Supports provision for buildings to be constructed in a Flood Assessment Area on a permitted basis if the specified criteria are met. However, PER-1 is opposed on the basis that standard NH-S2 limits earthworks to 250 m ² per calendar year. On a large industrial site, this small allowance is an undue constraint on typical operations.	Either: 1. Delete of NH-R1 PER-1 ; OR 2. Retain NH-R1 as notified, subject to the grant of the relief sought by the submitter in respect of NH-S2, being an increased allowance for earthworks in the GIZ.
Silver Fern Farms	172.30	NH - Natural Hazards	Rules	NH-R4 Natural hazard sensitive activities or structures and additions to such activities or structures with a ground floor area of 30m ² or more	Seeks clarity of the non-complying status under rule NH-R4.2 for >30m ² developments in a High Hazard Area Overlay. The submitter's site is not within the High Hazard Area Overlay, but parts of the site are subject to the Sea Water Inundation Overlay. If land is mapped in the Sea Water Inundation Overlay and is classed as a High Hazard Area, the Submitter opposes the non-complying activity status.	1. Retain a permitted and restricted discretionary consenting pathway for land in a Flood Assessment Area. AND 2. Amend NH- R4 Natural hazard sensitive activities [...] and other provisions as necessary, to clarify that land in the Sea Water Inundation Overlay is not subject to a non-complying consenting pathway for development of >30m ² .

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.31	NH - Natural Hazards	Rules	NH-R7 Natural Hazard Sensitive Activities and additions, new buildings, and structures with a ground floor area of less than 30m ² (excluding Regionally Significant Infrastructure)	Supports the permitted status for small buildings and structures.	Retain as notified.
Silver Fern Farms	172.32	NH - Natural Hazards	Rules	NH-R8 Subdivision	The submitter is concerned about the ambiguity about whether land in the Sea Water Inundation Overlay is part of the High Hazard Area Overlay. If this is the case, then a non-complying activity status under NH-R8.4 would be inappropriate as it would conflict with and override the restricted discretionary pathway under rule CE-R11.1.	Amend rule NH-R8 Subdivision and other provisions as necessary to clarify that the subdivision of land in the Sea Water Inundation Overlay is not subject to a non-complying consenting pathway under the 'High Hazard Area Overlay'.
Silver Fern Farms	172.33	NH - Natural Hazards	Standards	NH-S1 Flood Risk Certificate	The submitter is concerned about the ambiguity about whether land in the Sea Water Inundation Overlay is part of the High Hazard Area Overlay. If this is the case, then the submitter opposes the note for NH-S1 that indicates that a finished floor level will not be provided, given the Sea Water Inundation Overlay covers a large portion of the Pareora site, including most of the area within the GIZ.	Clarify whether the High Hazard Area Overlay includes land in the Sea Water Inundation Overlay.
Silver Fern Farms	172.34	NH - Natural Hazards	Standards	NH-S2 Volume of earthworks	Considers the earthworks allowance of 250m ² is insufficient and will generate inefficient resource consent requirements. A 2,000 m ² permitted earthworks limit - as provided for the Rural zones - is considered more appropriate.	Amend NH-S2 as follows: NH-S2 Volume of earthworks 1.Flood Assessment Areas Overlay <i>The earthworks do not exceed:</i> <ul style="list-style-type: none"> • 2,000 m² in area in any calendar year in a Rural zone <i>or General Industrial Zone</i>; and • 250 m² in area in any calendar year in any other zone

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.35	Planning Maps	Major Hazard Facilities Overlay	SHF-14	<p>The submitter's site in Pareora is included in the Major Hazard Facility Overlay as SHF-14 but is not listed in SCHED2 - Schedule of Major Hazard Facilities. It is therefore unclear whether the MHF provisions apply or not. The submitter agrees with the general approach to managing hazardous substances.</p> <p>However, on the assumption that Silver Fern Farms' site is a Major Hazard Facility, Silver Fern Farms opposes the unqualified requirement for a Quantitative Risk Assessment for all additions to Major Hazard Facilities.</p> <p>In cases where an addition does not change the volume or location of hazardous substances use/storage, a requirement to prepare a QRA will be redundant and should not be mandatory.</p>	<ol style="list-style-type: none"> Clarify which facilities are considered Major Hazard Facilities and which are hazardous facilities only is required. Amend the Major Hazard Facility overlay as required to ensure only Major Hazard Facilities are shown. Separately map the overlay and schedule of 'Hazardous Facilities' should be included in the proposed Plan to avoid confusion. Amend to ensure a Quantitative Risk Assessment for all additions to Major Hazard Facilities is only required where there is likely to be a change in the facility's risk profile as a result of the additions.
Silver Fern Farms	172.36	HS - Hazardous Substances	Objectives	HS-O1 Hazardous substances, use, storage and disposal	It is appropriate to avoid unacceptable risks associated with hazardous substances.	Retain as notified.
Silver Fern Farms	172.37	HS - Hazardous Substances	Objectives	HS-O2 Sensitive activities	Seeks that 'avoidance' is added to this objective, given the significant resource management issues that can arise as a result of reverse sensitivity effects.	<p>Amend HS-O2 as follows:</p> <p>HS-O2 Sensitive activities</p> <p><i>New sensitive activities are located <u>to avoid, or where avoidance is not possible, are designed to mitigate, minimise</u> reserve sensitivity effects on major hazard facilities and to avoid unacceptable risks to the sensitive activity.</i></p>
Silver Fern Farms	172.38	HS - Hazardous Substances	Policies	HS-P1 New Major Hazard Facilities and additions to existing Major Hazard Facilities	<p>Questions the need for a Quantitative Risk Assessment for all additions to Major Hazard Facilities, particularly in cases where there is no change to the volume of hazardous substances proposed or where they are situated on site. The submitter also questions whether the unacceptable risk criteria of 1 x 10⁻⁶ per year is appropriate.</p> <p>In cases where an addition does not change the volume or location of hazardous substances use/storage, a requirement to prepare a QRA will be redundant and should not be mandatory. Opposes the QRA for all additions to major hazardous facilities.</p> <p>It is not clear where High Hazard Areas are located in the District. There is a High Hazard Area overlay, but it does not appear to contain any information to allow the for SFF to assess the impact of the proposed provisions on its operation.</p>	<p>Amend HS-P1 and other related provisions, to:</p> <ol style="list-style-type: none"> only require a Quantitative Risk Assessment for all additions to Major Hazard Facilities where there is likely to be a change in risk as a result of the additions; <p>AND</p> <ol style="list-style-type: none"> clarify what is a High Hazard Area to allow the submitter to appropriately assess the impact of provisions related to this on its operation. <p>[See related submission points on the NH - Natural Hazards Chapter]</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.39	HS - Hazardous Substances	Policies	HS-P2 Repair and maintenance of existing Major Hazard Facilities	Agrees with that part of the policy that supports the repair and maintenance of Major Hazard Facilities, but considers that upgrades should also be supported, given upgrades can improve the safety of these facilities. Consider the policy should also apply to hazardous facilities.	Amend HS-P2 as follows: HS-P2 Repair and maintenance of existing Major Hazard Facilities Enable the <u>upgrade</u> , repair and maintenance of existing Major Hazard Facilities <u>and hazardous facilities</u> .
Silver Fern Farms	172.40	HS - Hazardous Substances	Policies	HS-P3 Sensitive activities in proximity to Major Hazard Facilities	Seeks that 'avoidance' be added to this policy, given the significant resource management issues that can arise as a result of reverse sensitivity effects.	Amend HS-P3 as follows: HS-P3 Sensitive activities in proximity to Major Hazard Facilities <i>Require sensitive activities to be sufficiently separated from Major Hazard Facilities to <u>avoid or where avoidance is not possible, to</u> minimise reverse sensitivity effects on the Major Hazard Facility and to avoid unacceptable risks to the sensitive activity.</i>
Silver Fern Farms	172.41	HS - Hazardous Substances	Policies	HS-P4 Hazardous facilities (other than Major Hazard Facilities)	Supports the provision that hazardous facilities be enabled in areas outside of a sensitive environment and within Flood Assessment Areas where the flood hazard can be mitigated and that hazardous facilities be allowed if risks to sensitive environments can be avoided and if not possible, minimised.	Retain as notified.
Silver Fern Farms	172.42	HS - Hazardous Substances	Rules	HS-R1 Use and/or storage of hazardous substances in a hazardous facility (excluding Major Hazard Facilities)	Supports the provision for the permitted use and storage of hazardous substances as set out in this rule.	Retain as notified.
Silver Fern Farms	172.43	HS - Hazardous Substances	Rules	HS-R2 Maintenance and repair of Major Hazard Facilities	Supports that Major Hazard Facilities are able to be repaired and maintained to assist with ensuring the ongoing safety of the facility. But considers that upgrades should be provided for, given the benefits that upgrades can entail.	Amend HS-R2 as follows: HS-R2 Maintenance and repair of Major Hazard Facilities Enable the <u>upgrade</u> , repair and maintenance of existing Major Hazard Facilities <u>and hazardous facilities</u> .

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.44	HS - Hazardous Substances	Rules	HS-R3 Sensitive activity, including subdivision to create a new allotment to accommodate future sensitive activity, in proximity to a Major Hazard Facility	Supports that sensitive activities and subdivision should only be located where risks are acceptable. However, considers it appropriate for the permitted activity performance standards to require the QRA to be provided to the operator of the Major Hazard Facility, given a development proponent will not necessarily understand if additional/alterd development of the Major Hazard Facility is consented or planned - which could affect the validity of the QRA.	Amend HS-R3 as follows: HS-R3 Sensitive activity.... in proximity to a Major Hazard Facility Activity status: Permitted Where: PER-1 <i>Where a Quantitative Risk Assessment has been prepared by a suitably qualified person for a Major Hazard Facility and provided to Timaru District Council, <u>and</u> the sensitive activity is located outside any area of unacceptable risk <u>and evidence is provided that the Quantitative Risk Assessment has been received by the operator of the Major Hazard Facility;</u> or</i> PER-2 <i>Where a Quantitative Risk Assessment does not exist for a Major Hazard Facility, the sensitive activity is not located within 250m of an existing Major Hazard Facility.</i> Activity status where compliance not achieved: Non-Complying.
Silver Fern Farms	172.45	HS - Hazardous Substances	Rules	HS-R4 New Major Hazard Facilities and additions to Major Hazard Facilities	Considers consenting requirements should only be triggered by an increase in risk as a result of changes to the volume of hazardous substance stored on site or how they are stored. Also, the submitter considers the PDP should only manage risks that are not already managed by existing legislation.	Amend HS-R4 New Major Hazard Facilities and additions to Major Hazard Facilities to: <ol style="list-style-type: none">clarify that a resource consent is only required when the volume of hazardous substance stored on site or there is a change to how they are stored.only capture activities not already managed by existing legislation, for example instances where hazardous substances are located in an area that is subject to risks from natural hazards.
Silver Fern Farms	172.46	SASM - Sites and Areas of Significance to Māori	Rules	SASM-R1 Earthworks not including quarrying and mining	Considers the permitted earthworks limits be aligned with those specified in the underlying zone and be made subject to a yearly timescale. Otherwise, SASM-R1 PER-1 will generate a requirement for repetitive, inefficient earthworks consent applications once the initial 750m ² allowance is expended. The requirement of rule SASM-R1 PER-2 for an Accidental Discovery Protocol commitment form to be lodged, is considered to provide appropriate surety that any accidental discovery (which is an event that can occur regardless of the scale of earthworks) will be appropriately managed.	Amend SASM-R1 Earthworks not including quarrying and mining to: <ol style="list-style-type: none">align the permitted maximum earthworks area with the limits and timescales specified for the underlying zones in EW-S1; ANDretain the performance standard under SASM-R1 PER-2 for Accidental Discovery Protocols to be observed.
Silver Fern Farms	172.47	ECO - Ecosystems and Indigenous Biodiversity	Objectives	ECO-O1 Protection of significant indigenous biodiversity	The objective should be linked to the Significant Natural Area mapping to avoid uncertainty about where the requirement to protect these values applies.	Amend ECO-O1 as follows: ECO-O1 Protection of significant indigenous biodiversity <i>The values of significant indigenous vegetation and significant habitats of indigenous fauna <u>mapped</u> across the District are protected.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.48	ECO - Ecosystems and Indigenous Biodiversity	Objectives	ECO-O2 Maintenance and enhancement of indigenous biodiversity	Supports the maintenance or enhancement of indigenous biodiversity.	Retain as notified.
Silver Fern Farms	172.49	ECO - Ecosystems and Indigenous Biodiversity	Policies	ECO-P1 Assessment and identification of significant indigenous biodiversity	Supports the same methodology for identifying SNA's as set down in the Canterbury Regional Policy Statement. Considers consistency with the RPS will assist the efficiency of consenting processes. Also supports the scheduling of SNA's to minimise uncertainty.	Retain as notified.
Silver Fern Farms	172.50	Planning Maps	Significant Natural Areas overlay		Supports mapping and scheduling of SNA's in the proposed Plan.	Retain as notified.
Silver Fern Farms	172.51	ECO - Ecosystems and Indigenous Biodiversity	Policies	ECO-P2 Appropriate indigenous vegetation clearance in significant natural areas	Supports providing exemptions for certain vegetation removal in SNAs.	Retain as notified.
Silver Fern Farms	172.52	ECO - Ecosystems and Indigenous Biodiversity	Policies	ECO-P3 Protection of indigenous biodiversity in sensitive areas	Supports the policy to contemplate the management of indigenous vegetation clearance rather than applying a mandatory requirement to avoid clearance.	Retain as notified.
		Indigenous Biodiversity				
Silver Fern Farms	172.53	ECO - Ecosystems and Indigenous Biodiversity	Policies	ECO-P5 Protection of Significant Natural Areas	Considers the policy should accord with the subsequent rule ECO-R1 which allows limited indigenous vegetation clearance in SNA's for various other reasons aside from infrastructure development.	Amend ECO-P5 Protection of Significant Natural Areas to ensure it does not foreclose on the range of exemptions for clearance specified in rule ECO-R1.
Silver Fern Farms	172.54	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R1 Clearance of indigenous vegetation (except as provided for in ECO-R2 for flood protection works or ECO-R3 for National Grid activities)	Supports the permitted activity status consenting framework, for indigenous vegetation clearance. An assessment matter should enable applicants and decision-makers to differentiate between remnant indigenous vegetation and vegetation that was planted as landscaping.	Amend ECO-R1 as follows: <i>ECO-R1 Clearance of indigenous vegetation [...]</i> <i>Activity status where compliance not achieved: Restricted discretionary</i> <i>Matters of discretion are restricted to:</i> <i>[...]</i> <i>12. Whether the indigenous vegetation is landscaping for amenity or aesthetic purposes.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.55	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R5 Earthworks in a Significant Natural Area	Considers that the permitted activity status for indigenous vegetation clearance in SNAs where the clearance is for SNA rehabilitation (rule ECO-R1 PER-5) contradicts the non-complying resource consent to be obtained for earthworks undertaken in the course of ecological restoration. Vegetation clearance would be permitted, but the earthworks would face the most onerous consenting pathway available.	Amend ECO-R5 Earthworks in a Significant Natural Areas to provide a permitted activity rule for earthworks in an SNA where these are required as part of SNA restoration.
Silver Fern Farms	172.56	NATC - Natural Character	Objectives	NATC-O1 Protection of natural character	Considers the objective to enhance natural character “where possible” could, if interpreted literally, be read as a mandatory direction to carry out enhancements. It is inconsistent with the ‘encourage’ stance taken in the subsequent policies of this chapter.	Amend NATC-O1 as follows: <i>NATC-O1 Protection of natural character</i> <i>The natural character of the Timaru District’s wetlands and rivers and their margins is preserved and protected from inappropriate subdivision, use and development, and <u>the enhancement of natural character is encouraged where possible enhanced.</u></i>
Silver Fern Farms	172.57	NATC - Natural Character	Policies	NATC-P2 Restoration and enhancement	Supports encouraging enhancement actions rather than require them.	Retain as notified.
Silver Fern Farms	172.58	NATC - Natural Character	Policies	NATC-P3 Incentives	Supports the use of incentives for ecological restoration is an appropriate method to achieve NATC-O1.	Retain as notified.
Silver Fern Farms	172.59	NATC - Natural Character	Policies	NATC-P4 Preservation of natural character from inappropriate subdivision, use and development	Considers the direction under NATC-P4 to ‘only allow’ activities that restore riparian margins is a distinct departure from the direction of NATC-P2 to ‘provide for and encourage’ restoration. Furthermore, the definition of ‘riparian margins’ mean these areas are reasonably large, and there is the possibility this	Amend NATC-P4 as follows: <i>NATC-P4 Preservation of natural character from inappropriate subdivision, use and development</i> <i>Preserves the natural character values of riparian margins by only allowing subdivision, use and development that:</i> <i>[...]</i>
					policy places a restoration burden on these areas out of step with the effects of the proposal.	
Silver Fern Farms	172.60	NATC - Natural Character	Rules	NATC-R1 Vegetation clearance	Supports permitted activity status, with a default restricted discretionary consenting pathway, for vegetation clearance in a riparian margin.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.61	NATC - Natural Character	Rules	NATC-R3 Earthworks	Provision of a permitted activity status with a default restricted discretionary consenting pathway, for earthworks in a riparian margin, is supported. Although an amendment is sought to facilitate earthworks associated riparian restoration activities.	Amend NATC-R3 as follows: NATC-R3 Earthworks Riparian margins of a river that is not an HNWB Activity status: Permitted [...] PER-X <u>The earthworks are to restore or enhance the natural character or ecological values of the riparian margin.</u>
Silver Fern Farms	172.62	NATC - Natural Character	Rules	NATC-R4 Construction of fences	Provision of a permitted activity status for post-and-wire fences in a riparian margin, is supported.	Retain as notified.
Silver Fern Farms	172.63	NATC - Natural Character	Rules	NATC-R5 Buildings and structures excluding fences	Supports a restricted discretionary consenting pathway for buildings and structures, excluding fences in non-HNWB riparian margins.	Retain as notified.
Silver Fern Farms	172.64	PA - Public Access	Objectives	PA-O1 Public access	Considers the term 'desirable' does not infer an evidence based approach. It should be clarified that the provision of public access should be restricted where necessary.	Amend PA-O1 as follows: PA-O1 Public access <i>Public access to and along the coastal marine area and the margins of identified wetlands and rivers is maintained and enhanced, and only restricted where desirable necessary.</i>
Silver Fern Farms	172.65	PA - Public Access	Policies	PA-P2 Requirements for public access	Supports the consideration of operational requirements as per sub-clause (5) and of public safety risks as per sub-clause (6).	Retain as notified.
Silver Fern Farms	172.66	PA - Public Access	Policies	PA-P3 Design and construction of public access	Considers that in some areas, where public access along rivers and the coastal marine area is subject to riverine and coastal processes, the maintenance of an access design that meets Council standards may not be possible. As such, the policy direction should not foreclose on the ability to consider alternative design outcomes.	Amend PA-P3 as follows: PA-P3 Design and construction of public access <i>Ensure that all public access routes are designed in accordance with Council standards for recreational <u>areas where natural processes would not compromise the design.</u></i>
Silver Fern Farms	172.67	PA - Public Access	Policies	PA-P4 Limiting public access	Supports that an exemption be provided from the requirement to provide public access in cases when public health and safety issues would arise from providing public access.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.68	PA - Public Access	Rules	PA-R1 Any new land use, subdivision or development	Opposes this rule as it is unclear how this provision is intended to work with respect to sites in the GIZ. The submitter's Pareora site includes a GIZ site > 5,000m ² that adjoins the Public Access Provision Overlay ('PAPO') along the foreshore. The rule is silent on the foreshore PAPO. The purpose and mechanics of this rule are unclear and clarification is sought.	Delete PA-R1 .
Silver Fern Farms	172.69	VS - Versatile Soil	Objectives	VS-O1 Protection of versatile soils	Seeks an amendment to ensure 'appropriate' activities are contemplated by the higher-order NPS-HPL.	Amend VS-O1 as follows: VS-O1 Protection of versatile soils <i>Versatile soils remain available for non-intensive primary production and are protected from inappropriate subdivision, use and development.</i>
Silver Fern Farms	172.70	VS - Versatile Soil	Policies	VS-P2 Maintaining availability of versatile soils	Considers sub-clause 3 is unclear. Is the desired outcome outcome a reference to finished ground level post-earthworks, or a reference to the remediation of contaminated soils.	Amend VS-P2.3 to clarify the outcome sought.
Silver Fern Farms	172.71	VS - Versatile Soil	Policies	VS-P2 Maintaining availability of versatile soils	Supports 5.b insofar as it contemplates exemptions for activities with functional, technical or operational needs that require a location in the Versatile Soils Overlay.	Retain VS-P2.5.b as notified.
Silver Fern Farms	172.72	VS - Versatile Soil	Rules	VS-R1 Buildings and impervious surfaces	Considers the permitted activity performance standard should be amended to provide for repairs and routine maintenance to existing development in the overlay where the extent of site coverage is not increased.	Amend VS-R1 as follows: VS-R1 Buildings and impervious surfaces Activity status: Permitted Where: PER-1 <i>The maximum area covered by buildings and impervious surfaces must not exceed 10% of that portion of the site within the overlay or 2000m² within the overlay, whichever is the lesser. Except this does not apply to buildings and impervious surfaces for the widening or upgrading (including sealing) an existing road within the existing road reserve, <u>or to repairs and maintenance that do not increase the existing extent of site coverage by buildings and impervious surfaces.</u></i> [...]
Silver Fern Farms	172.73	SUB - Subdivision	Objectives	SUB-O3 Rural subdivision	The potential for subdivision to cause reverse sensitivity effects on existing industrial activities in rural areas, and major hazard facilities is recognised in this objective.	Amend SUB-O3 as follows: SUB-O3 Rural Subdivision [...] <i>4. minimise reverse sensitivity effects on intensive primary production <u>and existing industrial activities and major hazard facilities in any zone.</u></i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms Silver Fern Farms	172.74	SUB - Subdivision	Policies	SUB-P5 Reverse Sensitivity	Seeks to ensure subdivision design is cognisant of interfaces with non-residential zones.	Amend SUB-P5 as follows: SUB-P5 Reverse Sensitivity Only allow subdivision that does not result in reverse sensitivity effects that would compromise the operation of regionally significant infrastructure/facilities and legally established intensive primary production <u>or industrial activities</u> .
Silver Fern Farms	172.75	SUB - Subdivision	Policies	SUB-P9 Residential subdivision	A minor amendment is appropriate to align sub-clause SUB-P9(7) with the direction of SUB-P5.	Amend SUB-P9 as follows: SUB-P9 Residential subdivision Require residential subdivision to accord with the purpose, character and qualities of the zone, and maintain and enhance amenity values, by ensuring: [...] 7. conflict between residential activities and adjoining land uses are <u>is avoided or minimised including by integrating buffers between new lots and adjoining zones</u> .
Silver Fern Farms Silver Fern Farms	172.76	SUB - Subdivision	Policies	SUB-P14 Rural allotments	It is not sufficient to allow a small-lot rural zone subdivision simply to retain the average dwelling density anticipated for the zone. And also to amend that new allotments do not facilitate the development of rural-residential dwellings in the environs of activities like the Pareora processing site.	Amend SUB-P14 as follows: SUB-P14 Rural allotments Avoid subdivision that creates allotments that are less than the required minimum allotment size within the General Rural Zone and Rural Lifestyle Zone unless: [...] 2. the non-compliance is minor, and the subdivision maintains the dwelling density anticipated for the zone <u>and does not facilitate the establishment of sensitive activities with reverse sensitivity effects on existing rural and industrial activities; or and</u>
Silver Fern Farms	172.77	SUB - Subdivision	Standards	SUB-S1 Allotment sizes and dimensions	Supports having the 40-hectare minimum lot size specified in the GRUZ and for no minimum lot size to be specified for land in the GIZ. Supports the respective purposes of these zones.	Retain as notified.
Silver Fern Farms	172.78	CE - Coastal Environment	Objectives	CE-O2 Quality of the Coastal Environment	Supports that public access to the coastal environment is not required in all locations and should only be provided where it is safe.	Retain as notified.
Silver Fern Farms	172.79	CE - Coastal Environment	Objectives	CE-O5 Natural features and buffers	Supports where existing development is subject to coastal hazards it may not be appropriate to rely on natural features and buffers to manage the hazards because there may be insufficient buffer space. The words "wherever appropriate" appropriately provides for this scenario.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.80	CE - Coastal Environment	Objectives	CE-O6 Existing urban activities	The objective fails to recognise existing activities located outside the urban environment but within highly modified parts of the mapped "coastal environment" - such as the Pareora processing site, at which location substantial industrial development is present within the proposed Coastal Environment Overlay.	Amend CE-O6 as follows: CE-O6 Existing urban activities <i>Recognise <u>and provide for existing activities located in highly modified parts of the coastal environment that parts of the coastal environment are highly modified by existing urban activities, including the Port of Timaru, and provide for these ongoing activities.</u></i>
Silver Fern Farms	172.81	CE - Coastal Environment	Policies	CE-P1 Identifying the Coastal Environment	Supports the appropriate mapping of the coastal environment to align with Policy 1 (Extent and characteristics of the coastal environment) of the New Zealand Coastal Policy Statement.	Retain as notified.
Silver Fern Farms	172.82	CE - Coastal Environment	Policies	CE-P2 Identifying areas of high coastal natural character	Supports that it is appropriate for mapping of areas of high coastal natural character to align with Policy 13(1)(c) of the New Zealand Coastal Policy Statement.	Retain as notified.
Silver Fern Farms	172.83	CE - Coastal Environment	Policies	CE-P4 Role of natural features and vegetation	Supports that natural topographic features assist in avoiding or mitigating the risk to human life and property from coastal hazards are only restored where practicable.	Retain as notified.
Silver Fern Farms	172.84	CE - Coastal Environment	Policies	CE-P7 Restoration or rehabilitation of natural character	This policy is broadly consistent with Policy 14 (Restoration of natural character) of the NZCPS.	Retain as notified.
Silver Fern Farms	172.85	CE - Coastal Environment	Policies	CE-P9 Anticipated activities	The submitter does not support this policy and requests an amendment. They view this policy as disregarding significant extant industrial development that is outside the defined "urban areas". The Specific Height Control Overlay (35 m maximum permitted height limit) is proposed to apply to the Submitter's Pareora processing site. It is therefore appropriate to amend CE-P9 to reflect that significant development is anticipated at the site.	Amend CE-P9 as follows: CE-P9 Anticipated activities <i>Enable activities that are of a scale and type that:</i> <i>1. will maintain the coastal natural character qualities identified in CE-P8 or</i> <i>2. if located within urban areas <u>or a General Industrial Zone</u>, are consistent with the anticipated qualities of the applicable zone.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.86	CE - Coastal Environment	Policies	CE-P11 Preserve the natural character qualities of areas with Coastal High Natural Character	This policy is generally consistent with NZCPS Policy 13 (Preservation of natural character). Minor amendments are appropriate to improve the precision of the policy though. For example, the Coastal High Natural Character Overlay applies to land immediately adjacent to highly modified industrial and urban sites. Therefore, the reference in sub-clause (iii) to a sense of remoteness will not be universally applicable to all areas in the Coastal High Natural Character Overlay.	Amend CE-P11 as follows: CE-P11 Preserve the natural character qualities of areas with Coastal High Natural Character <i>Only allow subdivision, use and development in areas of the Coastal High Natural Character Overlay where:</i> <i>1. for infrastructure, the development is in accordance with EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure; and</i> <i>2. for other activities:</i> <i>a. <u>the activity</u> avoids significant adverse effects <u>on the identified natural character qualities of the area in the Coastal High Natural Character Overlay;</u> and</i> <i>b. avoids, remedies or mitigates all other adverse effects on the identified natural character qualities; and</i> <i>c. demonstrates that it is appropriate by ensuring that the area of Coastal High Natural Character continues to:</i> <i>d. recognise and provide for the on-going natural physical processes that have created the Coastal Environment; and</i> <i>i. retain the integrity of landforms and geological features; and</i> <i>ii. retain a sense of remoteness and wildness <u>where these are existing qualities;</u> and</i> <i>iii. [...]</i>
Silver Fern Farms	172.87	CE - Coastal Environment	Policies	CE-P12 Coastal Hazard Areas (excluding Regional Significant Infrastructure)	The submitter considers an unqualified policy directive to 'avoid' activities in the Sea Water Inundation and Coastal Erosion Overlays is likely to be problematic given the scale of existing industrial development present at their site in Pareora. RMA s6(h) requires "the management of significant risks from natural hazards" and it is considered that an "avoidance" policy setting may cause inadvertent issues at a project consenting level, for even minor proposals.	Amend CE-P12 to: <i>1. require the avoidance of unacceptable natural hazard risk to life and property;</i> AND <i>2. the management of other risks.</i>
Silver Fern Farms	172.88	CE - Coastal Environment	Policies	CE-P14 Hard engineering natural hazard mitigation within the Coastal Environment	Considers that when read in conjunction with the policy requirement to 'Only allow...', it appears that CE-P14.4 will operate as a de-facto prohibition of any hard engineering works located seaward of a foreshore, dune system, estuary etc. The submitter considers this undesirable as in some instances, it may be necessary for hard engineering mitigation to replace natural defences. This policy would weigh against that outcome being realised. References in sub-clause (4) to natural "systems" appear	Amend CE-P14 to: <i>1. Ensure it does not inappropriately foreclose on the ability to use engineering measures to mitigate coastal hazards;</i> AND <i>2. remove duplication between (4) and (5).</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
					<p>superfluous, given the focus of the policy is on the interplay between engineering and natural “defences” against coastal erosion.</p> <p>Sub-clause (5) appears to unnecessarily repeat the preceding sub-clause. It is unclear what additional policy guidance of value is provided by (5) compared to (4).</p>	
Silver Fern Farms	172.89	CE - Coastal Environment	Rules	CE-R4 Buildings and structures and extension (excluding Regionally Significant Infrastructure and fences)	Minor developments at the submitters Pareora processing site will be subject to a restricted discretionary consenting pathway under Rule CE-R4(2) for buildings > 150 m2 because the site is not in a defined “urban area”. The Submitter does not support this rule given the scale of existing development and value of the investment in this site.	<p>Amend CE-R4 to provide:</p> <ol style="list-style-type: none"> a permitted activity status under Rule CE-R4.1 for the GIZ portion of the submitters Pareora site that are also located in the proposed Coastal Environment Overlay; <p>AND</p> <ol style="list-style-type: none"> a restricted discretionary consenting pathway under Rule CE-R4.4 for GIZ parts of the site also located in the proposed Sea Water Inundation Overlay.
Silver Fern Farms	172.90	CE - Coastal Environment	Rules	CE-R5 Earthworks, excluding: earthworks for natural hazard mitigation works; and any land disturbance	<p>Supports providing a permitted activity pathway for minor earthworks with a discretionary consenting pathway for larger earthworks proposals in the Coastal High Natural Character Area Overlay.</p> <p>Amendment sought to clarify a specific timescale. The Submitter views that the earthworks quantum specified are a per-year allowance. If not the rule would incorrectly require all earthworks to proceed via discretionary consent applications once the initial 100 m2 and 100 m3 allowances are expended.</p>	<p>Amend CE-R5 as follows:</p> <p>CE-R5 Earthworks, excluding:</p> <ul style="list-style-type: none"> earthworks for natural hazard mitigation works; and any land disturbance <p>[...]</p> <p>PER-3 Any other earthworks do not exceed the following quantum <u>per calendar year</u>: [...]</p>
Silver Fern Farms	172.91	CE - Coastal Environment	Rules	CE-R9 Natural hazard mitigation works, including earthworks - maintenance, replacement and upgrading	Supports providing for private natural hazard mitigation works as a restricted discretionary activity subject to the criteria specified in this rule.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.92	CE - Coastal Environment	Rules	CE-R12 Natural hazard mitigation works, including Earthworks - New	The Submitter considers a non-complying consent pathway for private natural hazard mitigation is inappropriate given the investment in the site and seeks a discretionary activity. This would be consistent with the activity status for activities in the Coastal Environment Overlay (CE-R9) and natural hazard mitigation works undertaken by the Crown or a Council (CE-R12, RDIS-1) to allow the Submitter to protect their assets.	Amend CE-R12 as follows: CE-R12 Natural hazard mitigation works, including earthworks - New This rule does not apply to natural hazard mitigation works only involving the planting of vegetation Coastal High Natural Character Area Overlay Coastal Erosion Overlay Sea Water Inundation Overlay [...] Activity status when compliance not achieved: Non-complying Discretionary
Silver Fern Farms	172.93	CE - Coastal Environment	Standards	CE-S1 Height of buildings and structures	Support clause (2) of the need for an adequate maximum height in the GIZ.	Retain as notified.
Silver Fern Farms	172.94	CE - Coastal Environment	Standards	CE-S2 Site coverage	The GIZ applies to land outside of “the urban area”. It would be inappropriate to constrain significant industrial enterprises with existing highly modified sites, due to their location.	Amend CE-S2 as follows: CE-S2 Site coverage <i>The building and structure within the overlay shall not exceed as maximum floor are of:</i> [...] <i>unless</i> <i>3. if the building and structure is to be located within the urban area <u>or the General Industrial Zone</u>, it shall be as per the applicable zone rules and standards.</i>
Silver Fern Farms	172.95	CE - Coastal Environment	Standards	CE-S3 Building and structure external materials	Support a permitted status for new buildings and structures although also seeks an amendment to clarify that the rule does not apply to interior surfaces.	Amend CE-S3 as follows: CE-S3 Building and structure external materials Coastal Environment Overlay <i>With the exception of the Port Zone, all <u>external cladding and roofing of</u> buildings and structures must be finished in materials with a maximum reflectance value of 30%.</i>
Silver Fern Farms	172.96	EW - Earthworks	Policies	EW-P5 Land stability	Considers the policy is unduly restrictive insofar as it does not clearly recognise that land stability is an inherent part of earthworks design.	Amend EW-P5 as follows: EW-P5 Land stability <i>Only allow earthworks on steeper slopes and in proximity to boundaries where <u>they will not impact potential adverse effects</u> on land stability <u>are avoided or mitigated</u>.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.97	EW - Earthworks	Standards	EW-S1 Areas	It is appropriate to apply minimal limits to earthworks in the GRUZ where associated with primary production. A minor amendment is recommended as the standard does not address the volume of any earthworks and if earthworks are to be unlimited, this should be made clear.	Amend EW-S1 Areas as follows: General Rural Zone Rural Lifestyle Zone <i>The area <u>and volume</u> of earthworks must be limited to as follows:</i> [...]
Silver Fern Farms	172.98	EW - Earthworks	Standards	EW-S1 Areas	Considers the allowance for 2,000 m ² of earthworks per 12-month period in the GIZ is appropriate.	Retain as notified with respect to the GIZ.
Silver Fern Farms	172.99	DWP - Drinking Water Protection	Rules	DWP-R5 Industrial activities including rural industry	The submitter seeks that the DWPA-mapped areas be deleted. The Drinking Water Protection Area overlay ('DWPA') maps two DWPA areas on highly modified parts of the submitter's existing Pareora processing site. No analysis is presented in the s32 report about the reasons for applying the DWPA overlay to the site.	If the relief sought in relation to the mapped DWPA areas at the Pareora processing site is not granted, the submitter would oppose the non-complying status under this rule, insofar as it applies to the Pareora site.
Silver Fern Farms	172.100	LIGHT - Light	Objectives	LIGHT-O2 Benefits of artificial lighting	Supports recognising the benefits of artificial lighting.	Retain as notified.
Silver Fern Farms	172.101	LIGHT - Light	Rules	LIGHT-R1 Artificial outdoor lighting outside light sensitive areas	Considers that this standard can be interpreted as requiring artificial light to be compliant with the Light Sensitive Areas illuminance levels at the source, regardless of whether the illumination actually affects the Light Sensitive Area.	Amend LIGHT-R1 Artificial outdoor lighting outside light sensitive areas to only require outdoor lighting to comply with the Light Sensitive Areas standards to the extent that the artificial light spills into a Light Sensitive Area.
Silver Fern Farms	172.102	NOISE - Noise	Objectives	NOISE-O1 Activities that generate noise	Considers the objective should clarify that noise only needs to be managed to the extent that it is received in a zone.	Amend NOISE-O1 as follows: NOISE-O1 Activities that generate noise <i>Noise effects generated by activities are compatible with the purpose, character and qualities of each <u>receiving</u> zone and do not compromise the health and well-being of people and communities.</i>
Silver Fern Farms	172.103	NOISE - Noise	Objectives	NOISE-O2 Reverse sensitivity	Considers it is appropriate to recognise and protect activities with inherent noise-generating elements, from reverse sensitivity.	Retain as notified.
Silver Fern Farms	172.104	NOISE - Noise	Policies	NOISE-P1 Maintenance of zone character and qualities	Considers it is appropriate to provide for noise-generating activities commensurate with the zoning that applies.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.105	NOISE - Noise	Policies	NOISE-P5 Reverse sensitivity	Considers it is appropriate to require that the burden of mitigation falls to sensitive activities seeking to locate in/near noisy environments rather than the reverse. Also notes that "higher noise environments" includes "Residential zones in close proximity to any General industrial zone..." this is considered acceptable.	Retain as notified.
Silver Fern Farms	172.106	NOISE - Noise	Rules	NOISE-R9 Any new building for use by a noise sensitive activity and alterations to existing buildings for use by a noise sensitive activity (not listed in NOISE-R12)	Considers it is appropriate to require new noise sensitive activities to be designed to mitigate noise where they locate near existing sources of noise, such as industrial zones.	Retain as notified.
Silver Fern Farms	172.107	RELO - Relocated Buildings and Shipping Containers	Policies	RELO-P1 Relocated buildings and shipping containers in General Industrial Zone	Considers it is appropriate to provide for these activities in the GIZ with greater flexibility than in other zones.	Retain as notified.
Silver Fern Farms	172.108	RELO - Relocated Buildings and Shipping Containers	Rules	RELO-R1 Placement of a relocated building	Considers it is appropriate to permit this activity in the GIZ without any further restrictions.	Retain as notified.
Silver Fern Farms	172.109	RELO - Relocated Buildings and Shipping Containers	Rules	RELO-R2 Placement of a shipping container	Considers it is appropriate to permit this activity in the GIZ without any further restrictions	Retain as notified.
Silver Fern Farms	172.110	GRUZ - General Rural Zone	Objectives	GRUZ-O1 Purpose of the General Rural Zone	Considers it is appropriate to recognise that primary production is supported by other activities (like rural industry) that rely on locating in the rural environment.	Retain as notified.
Silver Fern Farms	172.111	GRUZ - General Rural Zone	Objectives	GRUZ-O2 Character and qualities of the General Rural Zone	Considers it is appropriate to recognise the working environment characteristic of land in the GRUZ.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.112	GRUZ - General Rural Zone	Objectives	GRUZ-O3 Protecting primary production	Considers it appropriate to provide strong directions about the types of activities should be excluded from the GRUZ. Clarification required.	Amend GRUZ-O3 as follows: GRUZ-O3 Protecting primary production <i>The land resource of the General Rural Zone is not diminished by activities with no functional or operational need to locate in the General rural zone, and primary production is protected from <u>encroachment by</u> sensitive activities.</i>
Silver Fern Farms	172.113	GRUZ - General Rural Zone	Objectives	GRUZ-O4 Protecting sensitive activities and sensitive zones	Considers that clause (1) appears to be requiring that rural activities respond to encroachment by incompatible sensitive activities, which is inconsistent with the direction of GRUZ-O3. Considers it would not be appropriate for policy to constrain primary production, mining, quarrying etc if a new sensitive activity establishes in the area. Considers clause (2) is ambiguous.	Amend GRUZ-O4 as follows: GRUZ-O4 <u>Protecting-Managing</u> sensitive activities and sensitive zones <i>Intensive primary production, mining, quarrying, <u>rural industry</u> and other intensive activities <u>avoid or minimise generates no or minimal adverse</u> effects on:</i> <i>1. <u>existing</u> sensitive activities; and</i> <i>2. land <u>close to in</u> Residential, <u>Rural</u> Settlement, Māori Purpose and Open space zones.</i>
Silver Fern Farms	172.114	GRUZ - General Rural Zone	Policies	GRUZ-P1 Primary production activities	The submitter wants to ensure that the establishment of new incompatible activities in the GRUZ do not inadvertently receive policy support.	Amend GRUZ-P1 as follows: GRUZ-P1 Primary production activities <i>Enable a range of primary production activities, where they:</i> <i>[...]</i> <i>3. meet the standards and requirements to minimise adverse effects on <u>existing</u> sensitive activities and the environment.</i>
Silver Fern Farms	172.115	GRUZ - General Rural Zone	Policies	GRUZ-P2 Character and qualities of the General Rural Zone	Considers it appropriate for the policy to reiterate the principle of land use separation, in order to discourage sensitive activities from constraining rural activities.	Retain as notified.
Silver Fern Farms	172.116	GRUZ - General Rural Zone	Policies	GRUZ-P5 Protecting primary production	Supports recognition of rural industry in this policy, given the activity is similarly vulnerable to reverse sensitivity effects and is dependent on a rural location with ample separation from sensitive activities.	Amend GRUZ-P5 as follows: GRUZ-P5 Protecting primary production <u>and supporting activities</u> <i>Manage sensitive activities in the zone to ensure:</i> <i>1. they are located to avoid adverse effects on primary production <u>and supporting rural activities</u>;</i> <i>or</i> <i>2. if avoidance is not possible, the sensitive activity includes mitigation measures so that there is minimal potential for adverse effects on the sensitive activity from primary production <u>and supporting rural</u> activities.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.117	GRUZ - General Rural Zone	Policies	GRUZ-P7 Industrial activities, rural industries and other activities	Considers it appropriate that the policy allows for established industrial activities in the GRUZ, which recognises the significant investment in such activities that cannot be easily relocated.	Retain as notified.
Silver Fern Farms	172.118	GRUZ - General Rural Zone	Policies	GRUZ-P9 Workers accommodation	Supports the provision for workers accommodation in the GRUZ.	Retain as notified.
Silver Fern Farms	172.119	GRUZ - General Rural Zone	Rules	GRUZ-R1 Primary production and intensive primary production, not otherwise listed in this chapter	Considers the discretionary consenting pathway for activities which breach rule GRUZ-R1 PER-2, and for offensive trades associated with primary production', so that the reasons for the submission are complete is appropriate.	Retain as notified.
Silver Fern Farms	172.120	GRUZ - General Rural Zone	Rules	GRUZ-R4 Residential units, excluding seasonal workers accommodation and permanent workers accommodation	Considers a very low density of residential development is appropriate in the GRUZ and the UFD objectives, including the separation of incompatible activities.	Retain as notified.
Silver Fern Farms	172.121	GRUZ - General Rural Zone	Rules	GRUZ-R9 Residential Visitor Accommodation	Considers it is appropriate to heavily restrict this activity, given the potential for reverse sensitivity effects that constrain legitimate primary production and supporting activities.	Retain as notified.
Silver Fern Farms	172.122	GRUZ - General Rural Zone	Rules	GRUZ-R15 Shelterbelts	Considers permitting the planting of shelterbelts with a fall back restricted discretionary consenting pathway is appropriate.	Retain as notified.
Silver Fern Farms	172.123	GRUZ - General Rural Zone	Rules	GRUZ-R19 Seasonal workers accommodation	Considers the approach to seasonal worker accommodation in the GRUZ is appropriate.	Retain as notified.
Silver Fern Farms	172.124	GRUZ - General Rural Zone	Rules	GRUZ-R20 Permanent workers accommodation	Considers the approach appropriate.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.125	GRUZ - General Rural Zone	Rules	GRUZ-R21 Rural industry	<p>Considers the non-complying activity status for offensive trades associated with rural industry is onerous. It is noted that Rule GRUZ-R1 PER-1, allows for offensive trades associated with primary production or intensive primary production as discretionary.</p> <p>Offensive trades associated with rural industry are likely to locate in rural areas preferentially, due to the ability to achieve suitable separation from incompatible activities and the functional need of rural industry for a rural location.</p> <p>[refer to original submission for full reasons]</p>	<p>Amend GRUZ-R21 as follows:</p> <p>GRUZ-R21 Rural industry</p> <p>[...]</p> <p>Activity status where compliance not achieved: <u>Discretionary Non-complying</u></p>
Silver Fern Farms	172.126	GRUZ - General Rural Zone	Rules	GRUZ-R27 Expansion of existing legally established industrial activities, excluding mines and quarries	Considers it appropriate the rule provides for the expansion of existing industry with a discretionary consenting pathway.	Retain as notified.
Silver Fern Farms	172.127	GRUZ - General Rural Zone	Standards	GRUZ-S4 Setbacks for sensitive activities	Considers that restricting the siting of sensitive activities relative to primary production activities, is appropriate. The submitter seeks amendments to ensure the setbacks are also applied to supporting activities that are similarly vulnerable to reverse sensitivity effects.	<p>Amend GRUZ-S4 as follows:</p> <p>GRUZ-S4 Setbacks for sensitive activities</p> <p>1. No new sensitive activity may be established within 500m from:</p> <p style="padding-left: 40px;">a. the closest outer edge of any paddocks, hard-stand areas, structures or buildings used to house stock, or treatment systems, used for an intensive primary production activity <u>or rural industry</u>; and</p> <p style="padding-left: 40px;">b. an existing farm effluent disposal area; and</p> <p style="padding-left: 40px;">c. a lawfully established quarry or mine.</p> <p>2. No new building for a sensitive activity may be erected within 20 m from any other site boundary in a different ownership where a primary production <u>or rural industry</u> activity is being conducted, unless the site existed prior to 22 September 2022, in which case a 10m setback applies;</p> <p>3. No new building for a sensitive activity may be erected within 20 m of an existing shelter belt.</p>
Silver Fern Farms	172.128	GRUZ - General Rural Zone	Standards	GRUZ-S5 Intensive primary production activities and new farm effluent disposal areas	Considers this standard is appropriately targeted to address the potential effects of new farm effluent disposal areas.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.129	SETZ - Settlement Zone	Objectives	SETZ-O2 Character and qualities of the Settlement Zone	Considers restricting development in the Settlement Zone to “low density rural settlements” is appropriate, given the interface of the zone with the working rural environment and at Pareora meat processing facility, as well as servicing constraints and the strategic directions towards settlement patterns for the district set out in the UFD provisions.	Retain as notified.
Silver Fern Farms	172.130	SETZ - Settlement Zone	Policies	SETZ-P1 Range of activities	Considers the policy direction to ensure that activities are compatible with the unique purpose, character and qualities of the Settlement Zone, is appropriate.	Retain as notified.
Silver Fern Farms	172.131	SETZ - Settlement Zone	Policies	SETZ-P4 Other activities	Considers it is appropriate to restrict the further development and use of land in the SETZ to activities that are compatible with the zone and can manage adverse effects on the surroundings.	Retain as notified.
Silver Fern Farms	172.132	SETZ - Settlement Zone	Rules	SETZ-R1 Residential activity and Residential Unit	Considers it is appropriate to require a discretionary resource consent for multi-dwelling development in the SETZ.	Retain as notified.
Silver Fern Farms	172.133	SETZ - Settlement Zone	Rules	SETZ-R14 Any activities not otherwise listed	Considers it is appropriate to require a discretionary resource consent for unanticipated activities in the SETZ.	Retain as notified.
Silver Fern Farms	172.134	GIZ - General Industrial Zone	Introduction	General	Considers this adequately expresses the role of the GIZ.	Retain as notified.
Silver Fern Farms	172.135	GIZ - General Industrial Zone	Objectives	GIZ-O1 The purpose of the General Industrial Zone	Considers this objective appropriately recognises the economic contribution of industry and provides for a ‘range’ of industry. The objective should, however, also recognise ancillary activities.	Amend GIZ-O1 as follows: <i>GIZ-O1 The purpose of the General Industrial Zone</i> <i>The General Industrial Zone provides for a range of industrial activities, <u>ancillary activities</u> and other compatible activities that contribute to the economic wellbeing of the District.</i>
Silver Fern Farms	172.136	GIZ - General Industrial Zone	Objectives	GIZ-O2 Character and qualities of the	Considers sub-clause (7) appears to prohibit industry. A single policy direction requiring adverse effects beyond the GIZ boundaries to be managed is considered more appropriate.	Amend GIZ-O2 as follows: <i>GIZ-O2 Character and qualities of the General Industrial Zone</i>
				General Industrial Zone	This will enable all forms of mitigation to be considered. It removes the inflexible requirement to “not compromise” residential amenity. Landscaping the road frontage is considered impractical.	<i>The character and qualities of the General Industrial Zone comprise:</i> <i>[...]</i> <i>7. the management of adverse effects on existing activities in adjoining Residential, Open Space and Recreation and Special Purpose zones- buildings and activities that do not compromise the amenity of adjoining Residential and Open Space and Recreation Zones; and</i> <i>8. landscape planting and screening along road frontages and Open Space and Recreation Zones.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.137	GIZ - General Industrial Zone	Policies	GIZ-P1 Industrial activities	Considers that policy does not adequately support industry. There are no other industrial zones besides the GIZ and industry is (rightfully) permitted by rule GIZ-R1, it is therefore inappropriate to qualify the circumstances when ancillary activities to industry are allowed.	Amend GIZ-P1 as follows: GIZ-P1 Industrial activities Enable a range of industrial activities and ancillary associated activities. where: 1. ancillary activities are conducted on the same site as the primary industrial activity; and 2. does not include residential activities; and 3. they are compatible and complementary to the purpose, character and qualities of the General Industrial Zone.
Silver Fern Farms	172.138	GIZ - General Industrial Zone	Policies	GIZ-P2 Off-site industrial ancillary activities	Opposes the strict regulatory stance towards offsite ancillary industrial activities, that is unsupported by a S.32 analysis. There are a number of examples where it could be appropriate to locate an ancillary industrial activity on a different site - e.g. offsite storage to support a processing or manufacturing activity, or waste disposal areas separate to the site on which the principal activity is undertaken. If the Council's concern is about encroachment by non-industrial activities into the GIZ, the matter can be addressed by a directive policy and associated rules. Any concerns about conversion of industrial sites to non-industrial use can be addressed by limiting the scale of ancillary activities. [refer to original submission for full reasons]	Delete GIZ-P2 .
Silver Fern Farms	172.139	GIZ - General Industrial Zone	Policies	GIZ-P3 Streetscape and amenity values	Considers the clarity of the policy could be improved.	Amend GIZ-P3 as follows: GIZ-P3 Streetscape and amenity values Maintain the amenity values of the streetscape, the Residential Zones, and Open Space and Recreation Zones, by requiring: 1. outdoor storage areas to be screened from road boundaries and Residential Zones; and 2. landscaping along road boundaries and boundaries that adjoining the Open Space and Recreation Zones; and 3. buildings and structures to be a height and setback that will ensure activities in adjoining Residential zones and Open Space and Recreation Zones:

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
						<p>a) have a reasonable standard of sunlight access; and</p> <p>b) are not unreasonably dominated by built form; and</p> <p>c) maintain privacy of <u>residential activities in any</u> adjoining Residential Zones; and</p> <p>4. buildings to be a colour and reflectivity that does not detract from the amenity of Residential Zones.</p>
Silver Fern Farms	172.140	GIZ - General Industrial Zone	Policies	GIZ-P4 Industrial and trade waste connections	Considers it is appropriate to ensure that activities that rely on the trade waste system are not enabled unless sufficient capacity is available in that system.	Retain as notified.
Silver Fern Farms	172.141	GIZ - General Industrial Zone	Policies	GIZ-P5 Offensive trades	Notes there is no other industrial zone in the PDP and therefore it is the most suitable location for offensive trades to locate in. As such offensive trades need to be enabled, subject to standard regulatory direction to require the management of effects as opposed to only allowing these activities in certain circumstances.	<p>Amend GIZ-P5 as follows:</p> <p>GIZ-P5 Offensive trades</p> <p><u>Ensure offensive trades manage adverse effects on other activities and any adjacent non-industrial zone(s).</u></p> <p><u>Only allow offensive trades to establish in the General Industrial Zone where:</u></p> <p><u>1. the activity is located in a manner that will maintain the amenity values of adjacent zones; and</u></p> <p><u>2. the activity and buildings is designed in a way that contains or minimises nuisance effects.</u></p>
Silver Fern Farms	172.142	GIZ - General Industrial Zone	Policies	GIZ-P6 Other activities	Considers the clarity of the policy could be improved.	<p>Amend GIZ-P6 as follows:</p> <p>GIZ-P6 Other activities</p> <p>Avoid the establishment of <u>non-industrial other</u> activities <u>including residential activities</u> unless:</p> <p>1. [...]</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.143	GIZ - General Industrial Zone	Rules	GIZ-R1 Industrial activity Trade supplier Laboratories Service stations Motor garage Emergency services facilities Veterinary clinics Excluding any industrial ancillary activity and offensive trades	Considers it is appropriate to permit industrial and compatible activities and to provide fall back controlled or restricted discretionary consenting pathways. However, also considers a setback for outdoor storage is necessary.	Amend GIZ-R1 as follows: GIZ-R1 Industrial activity [...] Activity status: Permitted PER-1 <i>The activity and its buildings and structures (excluding fences <u>and outdoor storage</u>) are located more than 50 metres from any Residential Zones or Rural Lifestyle Zone; and</i> [...]
Silver Fern Farms	172.144	GIZ - General Industrial Zone	Rules	GIZ-R2 Industrial ancillary activities	Supports the permitted, and fallback controlled or restricted discretionary consenting pathways for ancillary activities. Considers the restriction on residential activity at PER-2 should be refined to provide a discretionary consenting pathway for seasonal workers accommodation.	Amend GIZ-R2 as follows GIZ-R2 Industrial ancillary activities General Industrial Zone Activity status: Permitted [...] PER-2 <i>The activity does not include:</i> 1. <i>a residential activity;</i> 2. <i>seasonal workers accommodation; and</i> [...] Activity status when compliance not achieved with PER-2.1: Non-complying. Activity status when compliance not achieved with PER-2.2: Discretionary.
Silver Fern Farms	172.145	GIZ - General Industrial Zone	Rules	GIZ-R3 Convenience stores, restaurants, cafes and take away food outlets	Supports this framework for the management of food and beverage outlets.	Retain as notified.
Silver Fern Farms	172.146	GIZ - General Industrial Zone	Rules	GIZ-R4 Offensive trades, including associated buildings and structures	Considers the discretionary activity status for offensive trades in a General Industrial Zone, is appropriate.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.147	GIZ - General Industrial Zone	Rules	GIZ-R5 Any other activity, including associated buildings and structures not otherwise listed in this chapter	Supports restricting encroachment by non-industrial activities into the GIZ, given the high sensitivity of industrial activities to compromise by reverse sensitivity effects.	Retain as notified.
Silver Fern Farms	172.148	GIZ - General Industrial Zone	Standards	GIZ-S2 Maximum height of buildings and structures	Considers the 35 m maximum building height limit is appropriate as it provides for significant industrial developments on large sites.	Retain as notified.
Silver Fern Farms	172.149	GIZ - General Industrial Zone	Standards	GIZ-S3 Setbacks of buildings and structures excluding fences	Considers the setback standards are an appropriate balance of the functional needs of industrial development and responsiveness to interfaces with non-industrial zones.	Retain as notified.
Silver Fern Farms	172.150	GIZ - General Industrial Zone	Standards	GIZ-S4 Building colour and reflectivity	Considers the colour limitation under sub-clause 1 to green, grey or brown excessive and unlikely to foster good visual amenity outcomes. The key effect to be managed is reflectivity and it is recommended that the rule be modified to focus on that.	Amend GIZ-S4 as follows: GIZ-S4 Building colour and reflectivity <i>1. The façade(s) of any building that is visible from and within 50 metres of the General Residential Zone must be painted or finished in a green, grey or tertiary (brown) colour and have a reflectivity value not exceeding 25%; and</i>
Silver Fern Farms	172.151	GIZ - General Industrial Zone	Standards	GIZ-S5 Outdoor storage	Seeks minor amendments for clarity and to enable flexibility in the method of screening - other options than fencing may be available.	Amend GIZ-S5 as follows: GIZ-S5 Outdoor storage <i>1. Any outdoor storage areas must <u>be</u> set back 15m from any boundary that adjoins the Residential Zones; and</i> <i>2. Any outdoor storage area that is located between 15m to 18m from any boundary that adjoins any Residential Zones must not exceed a maximum height of 6m; and</i> <i>3. Any outdoor storage areas must be <u>fully</u>-screened from view at ground level <u>by a fence to a height</u> of no less than 2m in height so that it is not visible from:</i> <i>a. any adjoining or adjacent site in the Residential Zones, and</i> <i>b. any residential unit in the General Rural Zone within 50 m of the storage.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.152	GIZ - General Industrial Zone	Standards	GIZ-S6 Landscaping and bund(s)	Considers landscaping along all road frontages and zone boundaries simply because land is in the GIZ is unnecessary. Considers that landscaping should only be required where there is a development/ activity with visual effects requiring mitigation.	Amend GIZ-S6 as follows: GIZ-S6 Landscaping and bund(s) 1. General Industrial Zone 1. A landscaping strip is required to mitigate visual effects must have a with minimum depth of 3m where located along any road boundary or boundary of a Residential Zone or Open Space and Recreation Zone; and [...]
Silver Fern Farms	172.153	OSZ - Open Space Zone	Policies	OSZ-P3 Primary production activities	Considers it is appropriate to enable non-intensive primary production in certain cases.	Retain as notified.
Silver Fern Farms	172.154	OSZ - Open Space Zone	Rules	OSZ-R5 Non-intensive primary production	Considers it is appropriate to allow for light grazing of land in this zone, such as rural sports fields.	Retain as notified.
Silver Fern Farms	172.155	Planning Maps	Drinking Water Protection Area overlay		The submitter notes that the mapped locations of DWPO are two bores used to supply drinking water to staff. The submitter considers it is inappropriate to apply a non-complying status to the long-established industrial activity mapped in these areas at 11 The Avenue, Pareora.	Either: 1. Delete the Drinking Water Protection Area overlay from the bores at 111 The Avenue, Pareora; OR 2. Ensure this well-established industrial activity is not inadvertently made subject to a non-complying activity status due to the presence of the bores.
Silver Fern Farms	172.156	Planning Maps	Major Hazard Facilities overlay		Considers it is appropriate that 111 The Avenue, Pareora is mapped as a Major Hazard Facility, given it is a facility designated as such by Worksafe.	Retain 111 The Avenue, Pareora as an MHF on the Planning Maps.
Silver Fern Farms	172.157	Planning Maps	Versatile Soils Overlay		The submitter queries the accuracy of the Versatile Soil overlay near 111 The Avenue, Pareora processing plant as it includes a railway corridor and foreshore.	Amend the Planning Maps to ensure the associated rules do not inappropriately apply to foreshore areas and to land developed with infrastructure.
Silver Fern Farms	172.158	Planning Maps	Sea Water Inundation Overlay		Considers there is no meaningful recognition in the s.32 evaluation of the implications of restricting the significant industrial development within the coastal environment at the submitters site at 111 The Avenue, Pareora (and other sites in and out of “urban areas”). Neither has there been consideration of providing for established industry outside of Timaru in a similar fashion to the approach taken towards existing activities within defined “urban areas” (note related submission on Rule CE-R4).	Either: 1. Delete from the Planning Maps, the Sea Water Inundation Overlay off the 111 The Avenue, Pareora; OR 2. Amend the provision of the Overlay to provide for activities at 111 The Avenue, Pareora in a similar fashion to the provision made for industry in defined “urban areas”.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Silver Fern Farms	172.159	APP5 - Criteria for Identifying Significant Natural Areas	General	General	Considers it is appropriate to apply a methodology for the identification of SNAs that is consistent with the Canterbury RPS.	Retain as notified.
Silver Fern Farms	172.160	SCHED2 - Schedule of Major Hazard Facilities	SCHED2 - Schedule of Major Hazard Facilities	General	Notes that 111 The Avenue, Pareora is shown on the planning maps as SHF-14 - a significant hazard facility but not referenced in SCHED2 as a Major Hazard Facility.	1. Clarify the mapping of the Pareora processing plant at 11 The Avenue as 'SHF-14' without listing the site in Schedule 2.
Silver Fern Farms	172.161	SCHED16 - Schedule of Precincts and Specific Control Areas	SCHED16B - Schedule of Specific Control Areas Layer	Height Specific Control Area	Supports this schedule insofar as the Height Specific Control Area is applied to the GIZ part of the 111 The Avenue, Pareora.	Retain as notified.
Silver Fern Farms	172.162	General	General	General	The submitter provides a general introduction to Silver Fern Farms Ltd and its operations and various properties at its Pareora meat processing facility. A range of maps and additional background information is provided to support the submission. [Refer to the original submission for further information and general reasons for the submission and Appendices/Maps].	Relief sought as per detailed submission points.
Alliance Group Limited	173.1	Definitions	Definitions	Hazardous facility	Supports the inclusion of this definition as it enables rules in the Hazardous Substances chapter to be operationalised.	Retain as notified.
Alliance Group Limited	173.2	Definitions	Definitions	High Hazard Area	Given the implications for consenting, clarification is sought as to whether reference in this definition to "inundation" means land in the Sea Water Inundation Overlay will also be subject to the High Hazard Overlay.	Amend the definition of High Hazard Overlay ; OR clarify the various hazard overlays, to confirm the implementation of this definition.
Alliance Group Limited	173.3	Definitions	Definitions	Industrial Activity	It is appropriate for the definition to align with the National Planning Standards 2019.	Retain as notified.
Alliance Group Limited	173.4	Definitions	Definitions	Industrial and Trade Waste	It is appropriate to define Industrial and Trade Waste to exclude sewage and greywater in order to implement differentiated consenting pathways for the management of these substances.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.5	Definitions	Definitions	Intensive Outdoor Primary Production	The submitter seeks to ensure that the supplementary feeding of stock being temporarily held at a meat processing plant is not inadvertently defined as 'Intensive Outdoor Primary Production'. Otherwise, a non-complying activity status under Rule GIZ-R5 would inappropriately apply.	Amend the definition of Intensive Outdoor Primary Production as follows: [...] <i>e. the feeding of supplementary feed during adverse weather events such as drought or snow <u>or while stock are temporarily held prior to processing.</u></i>
Alliance Group Limited	173.6	Definitions	Definitions	Intensively Farmed Stock	The submitter seeks to ensure that stock being held for processing purposes should not be considered 'Intensively Farmed Stock' and the supplementary feeding of stock being held temporarily should not be defined as 'Intensive Outdoor Primary Production'. [refer original submission for full reasons]	Amend the definition of Intensively Farmed Stock as follows: <i>a. cattle or deer grazed on irrigated land or contained for break-feeding of winter feed crops; and</i> <i>b. dairy cattle, including cows, whether dry or milking, and whether on irrigated land or not; and</i> <i>c. Pig farming (except pig farming for domestic self-subsistence home use);</i> <i>d. any stock that is associated with an intensive primary production <u>(excluding stock held for processing).</u></i>
Alliance Group Limited	173.7	Definitions	Definitions	Major Hazard Facility	Considers it is appropriate that the definition is consistent with the Work Safe designations in order to operationalise the policies and rules (including those relating to the protection of facilities from reverse sensitivity effects) later in the proposed Plan.	Retain as notified.
Alliance Group Limited	173.8	Definitions	Definitions	Noise Sensitive Activity	Considers it is appropriate to define these activities in order to implement the provisions of the Noise chapter, including the required mitigation of noise from industrial zones and activities.	Retain as notified.
Alliance Group Limited	173.9	Definitions	Definitions	Reverse Sensitivity	Considers the definition is too narrowly focused on "existing lawfully established activity" and it should be expanded to address consented but unimplemented activities, and permitted activities as these are part of the permitted baseline and it would accord with the intent of the approach to include. [refer original submission for full reasons]	Amend the definition of Reverse Sensitivity as follows: <i>Reverse sensitivity means the potential for the operation of an existing permitted, consented or lawfully established activity, <u>and the future development or expansion of that activity</u> to be compromised, constrained, or curtailed by the more recent possible or proposed establishment, <u>intensification</u> or alteration of another activity which may be sensitive to the actual, potential or perceived adverse environmental effects generated by an existing that activity.</i>
Alliance Group Limited	173.10	Definitions	Definitions	Sensitive Activity	The submitter seeks an amendment to exclude seasonal workers accommodation and caretaker dwellings from the definition. The references in (a) and (b) of the definition also require re-numbering and rationalisation.	Amend the definition of Sensitive Activity as follows: <i>1. Residential activities <u>(excluding seasonal workers accommodation and caretaker dwellings)</u></i> [...] AND Correct the references in (a) and (b).

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.11	SD - Strategic Direction	Objectives	SD-O1 Residential Areas and Activities	Considers that the fundamental land use planning issue of separation between incompatible uses should be expressed in this objective.	Amend SD-O1 as follows: SD-O1 Residential Areas and Activities [...] <u>iv. The location of new residential areas and activities avoids creating conflict with incompatible zones and activities.</u>
Alliance Group Limited	173.12	SD - Strategic Direction	Objectives	SD-O4 Natural Hazards	Considers that as drafted (iii) could be interpreted as requiring natural hazard mitigation by landowners regardless of any triggering proposal or event. Considers that the mitigation is only necessary to facilitate an activity.	Amend SD-O4 as follows: SD-O4 Natural Hazards [...] <u>iii. for other areas, natural hazards risks are appropriately mitigated if necessary to enable a land use, development or subdivision.</u>
Alliance Group Limited	173.13	SD - Strategic Direction	Objectives	SD-O6 Business Areas and Activities	Considers the objective should recognise industry, given the importance of the sector to the district's economy. It should also reiterate the principle of separation between incompatible activities.	Amend SD-O6 as follows: SD-O6 Business Areas and Activities <u>i. providing sufficient land for a range of business and industrial activities to cater for projected growth;</u> <u>ii. providing opportunities for a range of business activities to establish and prosper, provided that commercial activities outside of commercial areas are limited so they do not detract from the role and function of the City Centre and Town Centre zones or the viability of industrial zones.</u> <u>iii. Avoiding the encroachment of incompatible activities that are sensitive to the effects of commercial and industrial activities.</u>
Alliance Group Limited	173.14	SD - Strategic Direction	Objectives	SD-O9 Rural Areas	Considers the objective should recognise activities that support primary production, lest it be constructed in an inappropriately restrictive manner. Also considers that the burden of mitigation falls to new sensitive activities locating in the rural environment, not already established rural activities. And that maintenance will not always be practicable or desirable, given the land use composition of areas changes over time.	Amend SD-O9 as follows: SD-O9 Rural Areas <u>A range of primarily Primary production and supporting activities are enabled in the rural environment to enable the ongoing use of land for primary production for present and future generations, while:</u> <u>i protecting versatile soils for productive uses;</u> <u>ii. managing the adverse effects of intensive activities on existing sensitive activities;</u> <u>iii. managing the adverse effects of new sensitive activities on primary production, rural industry and supporting activities;</u> <u>iv. avoiding activities that have no functional/operational need to locate in the rural area;</u> <u>v. identifying and maintaining managing the character, qualities and amenity values of rural areas;</u> <u>vi. ensuring Future Development Area overlay remains available for future urban or rural lifestyle development.</u>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.15	UFD - Urban Form and Development	Objectives	UFD-O1 Settlement Patterns	Seeks minor amendments to ensure that the avoidance clauses are appropriately focussed.	Amend UFD-O1 as follows: UFD-O1 Settlement Patterns <i>A consolidated and integrated settlement pattern that:</i> [...] <i>vi. avoids <u>significant adverse effects on</u> areas with important natural, cultural and character values;</i> [...] <i>ix. avoids locating new growth in areas where the impacts from natural hazards are unacceptable <u>and natural hazard risk cannot be acceptably mitigated or which would require additional hazard mitigation;</u> and</i> [...]
Alliance Group Limited	173.16	CL - Contaminated Land	Introduction	General	Supports the approach to only provide objective and policy direction for the assessment of resource consent applications under the NESCS. Also supports the reference to the NESCS without including additional rules to manage the effects of contaminated land on land use changes and human health.	Retain as notified.
Alliance Group Limited	173.17	CL - Contaminated Land	Objectives	CL-O1 Management of contaminated land	Considers the objective implies that contaminated land should be made safe for its intended use, before any land disturbance. The objective should recognise that land disturbance is often part of the site remediation prior to a change of use. Supports CL-P3.	Amend CL-O1 as follows: CL-O1 Management of contaminated land <i>Contaminated land is made safe for human health and its intended use before any change of use, <u>and disturbance</u>, development or subdivision.</i>
Alliance Group Limited	173.18	CL - Contaminated Land	Policies	CL-P2 Subdivision, use and development of contaminated land	Considers that the use of 'best practice' implies there is a hierarchy of approaches or options to contaminated land management. Instead the submitter considers the policy focus should be to require site management in accordance with accepted procedures codified in standards such as the Ministry for the Environment's 'Contaminated land management guidelines'..	Amend CL-P2 Subdivision, use and development of contaminated land to replace the phrase 'best practice' with a reference to the particular guidelines or procedural manual that applications will be assessed against.
Alliance Group Limited	173.19	NH - Natural Hazards	Objectives	NH-O1 Areas subject to natural hazards	Parts of the submitter's site [Bridge Road, Smithfield] are subject to the Flood Assessment Area Overlay, Sea Water Inundation Overlay and the Coastal Erosion Overlay. Those portions of the site could accord with the definition in the Canterbury Regional Policy Statement ('RPS') of "High hazard areas" Considers it is inappropriate for mitigation measures to be unavailable in areas of high natural hazard. And considers proposed objective NH-O1 is inconsistent with RPS directions that contemplate risk mitigation in areas of natural hazard risk.	Amend NH-O1 as follows: NH-O1 Areas subject to natural hazards <i>Risk to human life and significant risk to property, from natural hazards is <u>avoided in high hazard areas or mitigated to an acceptable level:</u></i> <i>1. avoided in high hazard areas; and</i> <i>2. avoided or mitigated elsewhere to an acceptable level.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.20	NH - Natural Hazards	Objectives	NH-O3 Natural hazard mitigation works	Considers it is necessary to allow the exercise of discretion as to the use of buffers and natural features, particularly where there is existing development.	Amend NH-O3 as follows: NH-O3 Natural hazard mitigation works <i>Natural hazard mitigation works reduce risks to people and property, with a preference for the use of natural features and buffers <u>wherever appropriate</u>.</i>
Alliance Group Limited	173.21	NH - Natural Hazards	Policies	NH-P1 Identification of natural hazards and approach to management within Natural Hazard Areas	Considers this policy does not expressly reflect the obligation of RMA s75(3)(c) for district plans to give effect to regional policy statements.	Amend NH-P1 Identification of natural hazards and approach to management within Natural Hazard Areas to include reference to aligning the proposed district plan mapping of natural hazards with that of the Canterbury RPS.
Alliance Group Limited	173.22	NH - Natural Hazards	Policies	NH-P4 Subdivision, use and development in Flood Assessment Areas, excluding high hazard areas and overland flow paths	The submitter's site is included in the Major Hazard Facility overlay as SHF-12 but isn't listed in SCHED2 - Schedule of Major Hazard Facilities, as such it is unclear if Major Hazard Facility provisions apply to the site. Additionally, the submitter considers amendment is required to avoid undue regulation simply because a building is in a Flood Assessment Area.	Amend NH-P4 Subdivision, use and development in Flood Assessment Areas, excluding high hazard areas and overland flow paths as follows: [...] 5. <u>buildings within</u> major hazard facilities <u>containing hazardous substances</u> will not be inundated; and [...]
Alliance Group Limited	173.23	NH - Natural Hazards	Policies	NH-P5 Subdivision and Regionally significant Infrastructure in Liquefaction Awareness Areas	Supports the policy as it provides for subdivision that avoids or mitigates risk in the Liquefaction Awareness Areas Overlay.	Retain as notified.
Alliance Group Limited	173.24	NH - Natural Hazards	Policies	NH-P9 Natural hazard mitigation works	It appropriate to provide for private natural hazard mitigation works subject to the criteria specified in this policy. A minor amendment to clause (2)(d) is sought to recognise that changes to the flood risk profile may be acceptable in some cases. For example where the increased flood risk is outweighed by the benefit of the project.	Amend NH-P9 as follows: NH-P9 Natural hazard mitigation works [...] d. the construction or operation of the works will <u>avoid or acceptably mitigate</u> not lead to any increased or new risk from flooding to human life and property. [...]

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.25	NH - Natural Hazards	Policies	NH-P10 High Hazard Areas	Considers the unqualified avoidance policy setting is not appropriate as it may be acceptable to lose some structures e.g. a fence. Also considers that all high hazard areas need to be mapped, so the policy direction can be implemented at a consenting level..	Amend NH-P10 as follows: NH-P10 High Hazard Areas Avoid subdivision, use and development (excluding Regionally Significant Infrastructure) in, mapped or identified High Hazard Areas, unless: 1. it is a building that is not a natural hazard sensitive activity or is unlikely to suffer damage; or 2. it can be demonstrated that the risks of the natural hazard can be mitigated so that: 1. in the event of a natural hazard, there is likely to be no loss of life or serious injury or and any built development is not likely to suffer significant <u>property</u> damage or loss; and [...]
Alliance Group Limited	173.26	NH - Natural Hazards	Rules	NH-R1 Earthworks, excluding land disturbance and for natural hazard mitigation works	Supports provision for buildings to be constructed in a Flood Assessment Area on a permitted basis if the specified criteria are met. However, PER-1 is opposed on the basis that standard NH-S2 limits earthworks to 250 m ² per calendar year. On a large industrial site, this small allowance is an undue constraint on typical operations.	Either: 1. Delete of NH-R1 PER-1 ; OR 2. Retain NH-R1 as notified, subject to the grant of the relief sought by the submitter in respect of NH-S2, being an increased allowance for earthworks in the GIZ
Alliance Group Limited	173.27	NH - Natural Hazards	Rules	NH-R4 Natural hazard sensitive activities or structures and additions to such activities or structures with a ground floor area of 30M ² or more	Seeks clarity of the non-complying status under rule NH-R4.2 for >30m ² developments in a High Hazard Area Overlay. The submitter's site is not within the High Hazard Area Overlay, but parts of the site are subject to the Sea Water Inundation Overlay. If land is mapped in the Sea Water Inundation Overlay and is classed as a High Hazard Area, the Submitter opposes the non-complying activity status.	1. Retain a permitted and restricted discretionary consenting pathway for land in a Flood Assessment Area. AND 2. Amend NH- R4 Natural hazard sensitive activities [...] and other provisions as necessary, to clarify that land in the Sea Water Inundation Overlay is not subject to a non-complying consenting pathway for development of >30m ² .
Alliance Group Limited	173.28	NH - Natural Hazards	Rules	NH-R7 Natural Hazard Sensitive Activities and additions, new buildings, and structures with a ground floor area of less than 30m ² (excluding Regionally Significant Infrastructure)	Supports providing a permitted status for small buildings and structures.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.29	NH - Natural Hazards	Rules	NH-R8 Subdivision	The submitter is concerned about the ambiguity about whether land in the Sea Water Inundation Overlay is part of the High Hazard Area Overlay. If this is the case, then a non-complying activity status under NH-R8.4 would be inappropriate as it would conflict with and override the restricted discretionary pathway under rule CE-R11.1.	Amend NH-R8 Subdivision 1 Flood Assessment (4) and other provisions as necessary to clarify that the subdivision of land in the High Hazard Area Overlay is not subject to a non-complying consenting pathway under the 'High Hazard Area Overlay'.
Alliance Group Limited	173.30	NH - Natural Hazards	Standards	NH-S1 Flood Risk Certificate Flood Assessment Areas Overlay	The submitter is concerned about the ambiguity about whether land in the Sea Water Inundation Overlay is part of the High Hazard Area Overlay. If this is the case, then the submitter opposes the note for NH-S1 that indicates that a finished floor level will not be provided, given the Sea Water Inundation Overlay covers a large portion of the submitter's site.	Clarify whether the High Hazard Area Overlay includes land in the Sea Water Inundation Overlay.
Alliance Group Limited	173.31	NH - Natural Hazards	Standards	NH-S2 Volume of earthworks	Considers the earthworks allowance of 250m ² is insufficient and will generate inefficient resource consent requirements. A 2,000 m ² permitted earthworks limit - as provided for the Rural zones - is considered more appropriate.	Amend NH-S2 Volume of earthworks as follows: NH-S2 Volume of earthworks <i>The earthworks do not exceed:</i> <i>·2,000m² in area in any calendar year in a Rural <u>or General Industrial</u> zone; and</i> <i>250m² in area in any calendar year in any other zone.</i>
Alliance Group Limited	173.32	HS - Hazardous Substances	Introduction	Hazardous substances	The submitter's site in is included in the Major Hazard Facility Overlay as SHF-12 but is not listed in SCHED2 - Schedule of Major Hazard Facilities. It is therefore unclear whether the MHF provisions apply or not. The submitter agrees with the general approach to managing hazardous substances. However, on the assumption that the Alliance site is a Major Hazard Facility, Alliance opposes the unqualified requirement for a Quantitative Risk Assessment for all additions to Major Hazard Facilities. In cases where an addition does not change the volume or location of hazardous substances use/storage, a requirement to prepare a QRA will be redundant and should not be mandatory.	1. Clarify which facilities are considered Major Hazard Facilities and which are hazardous facilities only is required. 2. Amend the Major Hazard Facility overlay as required to ensure only Major Hazard Facilities are shown. 3. Separately map the overlay and schedule of 'Hazardous Facilities' should be included in the proposed Plan to avoid confusion. 4. Amend to ensure a Quantitative Risk Assessment for all additions to Major Hazard Facilities is only required where there is likely to be a change in the facility's risk profile as a result of the additions.
Alliance Group Limited	173.33	HS - Hazardous Substances	Objectives	HS-O1 Hazardous substances, use, storage and disposal	It is appropriate to avoid unacceptable risks associated with hazardous substances.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.34	HS - Hazardous Substances	Objectives	HS-O2 Sensitive activities	Seeks an amendment to ensure that an avoidance consideration is added to this objective, given the significant resource management issues that can arise as a result of reverse sensitivity effects.	Amend HS-O2 Sensitive activities as follows: HS-O2 Sensitive activities New sensitive activities are located to <u>avoid, or where avoidance is not possible, are designed to mitigate, minimise</u> reserve sensitivity effects on major hazard facilities and to avoid unacceptable risks to the sensitive activity.
Alliance Group Limited	173.35	HS - Hazardous Substances	Policies	HS-P1 New Major Hazard Facilities and additions to existing Major Hazard Facilities	Agrees with that part of the policy that supports the repair and maintenance of Major Hazard Facilities, but considers that upgrades should also be supported, given upgrades can improve the safety of these facilities. Consider the policy should also apply to hazardous facilities. It is not clear where High Hazard Areas are located in the District. There is a High Hazard Area overlay, but it does not appear to contain any information to allow Alliance to assess the impact of the proposed provisions on its operation.	Amend HS-P1 and other related provisions, to: 1. only require a Quantitative Risk Assessment for all additions to Major Hazard Facilities where there is likely to be a change in risk as a result of the additions; AND 2. clarify what is a High Hazard Area to allow the submitter to appropriately assess the impact of provisions related to this on its operation. [See related submission points on the NH - Natural Hazards Chapter].
Alliance Group Limited	173.36	HS - Hazardous Substances	Policies	HS-P2 Repair and maintenance of existing Major Hazard Facilities	Agrees with that part of the policy that supports the repair and maintenance of Major Hazard Facilities, but considers that upgrades should also be supported, given upgrades can improve the safety of these facilities. Consider the policy should also apply to hazardous facilities.	Amend HS-P2 as follows: HS-P2 Repair and maintenance of existing Major Hazard Facilities Enable the <u>upgrade, repair and maintenance of existing Major Hazard Facilities and hazardous facilities.</u>
Alliance Group Limited	173.37	HS - Hazardous Substances	Policies	HS-P3 Sensitive activities in proximity to Major Hazard Facilities	Seeks that 'avoidance' be added to this policy, given the significant resource management issues that can arise as a result of reverse sensitivity effects.	Amend HS-P3 as follows: HS-P3 Sensitive activities in proximity to Major Hazard Facilities Require sensitive activities to be sufficiently separated from Major Hazard Facilities to <u>avoid or where avoidance is not possible, to</u> minimise reverse sensitivity effects on the Major Hazard Facility and to avoid unacceptable risks to the sensitive activity.
Alliance Group Limited	173.38	HS - Hazardous Substances	Policies	HS-P4 Hazardous facilities (other than Major Hazard Facilities)	Supports the provision that hazardous facilities be enabled in areas outside of a sensitive environment and within Flood Assessment Areas where the flood hazard can be mitigated and that hazardous facilities be allowed if risks to sensitive environments can be avoided and if not possible, minimised.	Retain as notified.
Alliance Group Limited	173.39	HS - Hazardous Substances	Rules	HS-R1 Use and/or storage of hazardous substances in a hazardous facility (excluding Major Hazard Facilities)	Supports the provision for the permitted use and storage of hazardous substances as set out in this rule.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.40	HS - Hazardous Substances	Rules	HS-R2 Maintenance and repair of Major Hazard Facilities	Supports that Major Hazard Facilities are able to be repaired and maintained to assist with ensuring the ongoing safety of the facility. But considers that upgrades should be provided for, given the benefits that upgrades can entail.	Amend HS-R2 as follows: HS-R2 Maintenance and repair of Major Hazard of Major Hazard Facilities <i>Enable the <u>upgrade</u>, repair and maintenance of existing Major Hazard Facilities <u>and hazardous facilities</u>.</i>
Alliance Group Limited	173.41	HS - Hazardous Substances	Rules	HS-R3 Sensitive activity, including subdivision to create a new allotment to accommodate future sensitive activity, in proximity to a Major Hazard Facility	Supports that sensitive activities and subdivision should only be located where risks are acceptable. However, considers it appropriate for the permitted activity performance standards to require the QRA to be provided to the operator of the Major Hazard Facility, given a development proponent will not necessarily understand if additional/alterd development of the Major Hazard Facility is consented or planned - which could affect the validity of the QRA.	Amend HS-R3 as follows: HS-R3 Sensitive activity, including subdivision in proximity to a Major Hazard Facility Activity status: Permitted Where: PER-1 <i>Where a Quantitative Risk Assessment has been prepared by a suitably qualified person for a Major Hazard Facility and provided to Timaru District Council, and the sensitive activity is located outside any area of unacceptable risk <u>and evidence is provided that the Quantitative Risk Assessment has been received by the operator of the Major Hazard Facility</u>; or</i> PER-2 <i>Where a Quantitative Risk Assessment does not exist for a Major Hazard Facility, the sensitive activity is not located within 250m of an existing Major Hazard Facility.</i> Activity status where compliance not achieved: Non-Complying.
Alliance Group Limited	173.42	HS - Hazardous Substances	Rules	HS-R4 New Major Hazard Facilities and additions to Major Hazard Facilities	Considers consenting requirements should only be triggered by an increase in risk as a result of changes to the volume of hazardous substance stored on site or how they are stored. Also, the submitter considers the PDP should only manage risks that are not already managed by existing legislation.	Amend HS-R4 New Major Hazard Facilities and additions to Major Hazard Facilities to: 1. clarify that a resource consent is only required when the volume of hazardous substance stored on site or there is a change to how they are stored. 2. only capture activities not already managed by existing legislation, for example instances where hazardous substances are located in a natural hazard area.
Alliance Group Limited	173.43	HH - Historic Heritage	Rules	HH-R3 New buildings, structures and signs within a heritage setting	Considers a restricted discretionary activity status for these works in a heritage setting is appropriate.	Retain as notified.
Alliance Group Limited	173.44	HH - Historic Heritage	Rules	HH-R4 Earthworks within heritage settings	Considers a restricted discretionary activity status for earthworks in a heritage setting is appropriate.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.45	SASM - Sites and Areas of Significance to Māori	Rules	SASM-R1 Earthworks not including quarrying and mining	<p>In regard to SASM-R1.1 for the Wāhi Tūpuna Overlay:</p> <p>Considers the permitted earthworks limits be aligned with those specified in the underlying zone and be made subject to a yearly timescale.</p> <p>Otherwise, SASM-R1 PER-1 will generate a requirement for repetitive, inefficient earthworks consent applications once the initial 750m² allowance is expended.</p> <p>The requirement of rule SASM-R1 PER-2 for an Accidental Discovery Protocol commitment form to be lodged, is considered to provide appropriate surety that any accidental discovery (which is an event that can occur regardless of the scale of earthworks) will be appropriately managed.</p>	<p>Amend SASM-R1.1 Earthworks not including quarrying and mining within the Wāhi Tupuna Overlay to:</p> <ol style="list-style-type: none"> 1. Align the permitted maximum earthworks area with the limits and timescales specified for the underlying zones in EW-S1; <p>AND</p> <ol style="list-style-type: none"> 2. Retain the performance standard under SASM-R1.1.PER-2 for Accidental Discovery Protocols to be observed.
Alliance Group Limited	173.46	SASM - Sites and Areas of Significance to Māori	Rules	SASM-R1 Earthworks not including quarrying and mining	<p>In regard to SASM-R1.2 for the Wāhi Taoka Overlay:</p> <p>The Wāhi Taoka Overlay applies to the landholdings [Bridge Road, Smithfield] including the entirety of the meat processing plant and corresponds to SNA 825 on the site.</p> <p>An amendment is sought so that the permitted earthworks limits are aligned with those specified for the respective zones to ensure there is no extra work created for earthworks consent applications.</p> <p>The requirement of rule SASM-R1.2.PER-4 for an Accidental Discovery Protocol commitment form to be lodged, is considered to provide appropriate surety that any accidental discovery (which is an event that can occur regardless of the scale of earthworks) will be appropriately managed.</p>	<p>Amend SASM-R1.2 Earthworks not including quarrying and mining within the Wāhi Taoka Overlay to:</p> <ol style="list-style-type: none"> 1. align the permitted maximum earthworks area with the limits and timescales specified for the underlying zones in EW-S1; <p>AND</p> <ol style="list-style-type: none"> 2. modify the performance standard under SASM-R1.2.PER-4 for accidental discovery protocols to be observed in a way that does not mean that a form has to be submitted to make this commitment prior to every earthworks activity.
Alliance Group Limited	173.47	SASM - Sites and Areas of Significance to Māori	Rules	SASM-R2 Buildings and structures, including additions and alterations to existing buildings and structures and network utilities	The submitter agrees that these limits shouldn't apply in the General Industrial Zone.	Retain as notified.
Alliance Group Limited	173.48	SASM - Sites and Areas of Significance to Māori	Rules	SASM-R3 Indigenous vegetation clearance	Supports permitted activity indigenous vegetation clearance as described.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.49	SASM - Sites and Areas of Significance to Māori	Rules	SASM-R6 Intensively farmed stock	The entirety of the submitter's site, including stock holding paddocks, is within the Wāhi taoka and the activity of holding stock on the land for processing could meet the definition of 'Intensively Farmed Stock'. Requiring a consent for this as a non-complying activity could significantly impact the site operations.	1. As per relief sought on the definition of 'Intensively Farmed'; OR 2. Amend SASM-R6 Intensively Farmed Stock to provide a less restrictive consenting pathway for stock being held for processing purposes. [see related submission on the definition of Intensively Farmed Stock]
Alliance Group Limited	173.50	ECO - Ecosystems and Indigenous Biodiversity	Objectives	ECO-O1 Protection of significant indigenous biodiversity	Seeks to amend that the objective is linked to the Significant Natural Area mapping to avoid uncertainty about where the requirement to protect these values applies.	Amend ECO-O1 as follows: <i>ECO-O1 Protection of significant indigenous biodiversity</i> <i>The values of significant indigenous vegetation and significant habitats of indigenous fauna <u>mapped</u> across the District are protected.</i>
Alliance Group Limited	173.51	ECO - Ecosystems and Indigenous Biodiversity	Objectives	ECO-O2 Maintenance and enhancement of indigenous biodiversity	Supports providing for the maintenance or enhancement of indigenous biodiversity.	Retain as notified.
Alliance Group Limited	173.52	ECO - Ecosystems and Indigenous Biodiversity	Policies	ECO-P1 Assessment and identification of significant indigenous biodiversity	Supports the same methodology for identifying SNA's as set down in the Canterbury Regional Policy Statement. Considers consistency with the RPS will assist the efficiency of consenting processes. Also supports the scheduling of SNA's to minimise uncertainty.	Retain as notified.
Alliance Group Limited	173.53	Planning Maps	Significant Natural Areas overlay	ECO-P2 Appropriate indigenous vegetation clearance in significant natural areas	Supports mapping and scheduling of SNA's in the proposed Plan.	Retain as notified.
Alliance Group Limited	173.54	ECO - Ecosystems and Indigenous Biodiversity	Policies	ECO-P2 Appropriate indigenous vegetation clearance in significant natural areas	Supports providing exemptions for certain vegetation removal in SNAs.	Retain as notified.
Alliance Group Limited	173.55	ECO - Ecosystems and Indigenous Biodiversity	Policies	ECO-P3 Protection of indigenous biodiversity in sensitive areas	Supports the policy as it contemplates the management of indigenous vegetation clearance rather than applying a mandatory requirement to avoid clearance.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.56	ECO - Ecosystems and Indigenous Biodiversity	Policies	ECO-P5 Protection of Significant Natural Areas	Considers the policy should accord with the subsequent rule ECO-R1 which allows limited indigenous vegetation clearance in SNA's for various other reasons aside from infrastructure development.	Amend ECO-P5 Protection of Significant Natural Areas to ensure it does not foreclose on the range of exemptions for clearance specified in rule ECO-R1.
Alliance Group Limited	173.57	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R1 Clearance of indigenous vegetation (except as provided for in ECO-R2 for flood protection works or ECO-R3 for National Grid activities)	Considers it is appropriate that the provision be made for unavoidable clearance of indigenous vegetation in the course of removing pest plants and animals as a permitted activity.	Retain ECO-R1 PER-5 as notified.
Alliance Group Limited	173.58	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R2 Clearance of indigenous vegetation for natural hazard mitigation works	Considers it is unclear why clearance of indigenous vegetation for natural hazard mitigation work is permitted when undertaken by either of the Regional Council or Timaru District Council, but the most restrictive consenting pathway possible applies when undertaken by others as indicated by PER-2.	Amend ECO-R2 Clearance of indigenous vegetation for natural hazard mitigation works as follows: [...] Activity status when compliance is not achieved with PER-1 and PER-2: Controlled Activity status when compliance is not achieved with PER-2: Non-complying
Alliance Group Limited	173.59	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R5 Earthworks in a Significant Natural Area	This rule will require a non-complying resource consent to be obtained for earthworks undertaken in the course of ecological restoration. This stance contradicts the permitted activity status provided for indigenous vegetation clearance in SNAs where the clearance is for SNA rehabilitation (rule ECO-R1 PER-5). The vegetation clearance would be permitted, but the earthworks would require the most onerous consenting pathway available, therefore an amendment is sought.	Amend ECO-R5 Earthworks in a Significant Natural Area to provide a permitted activity rule for earthworks in an SNA where these are required as part of SNA restoration.
Alliance Group Limited	173.60	NATC - Natural Character	Objectives	NATC-O1 Protection of natural character	Seeks an amendment to help with the clarity of the interpretation and to ensure it is consistent with "encourage" rather than "require" stance expressed in subsequent policies of this chapter.	Amend NATC-O1 as follows: NATC-O1 Protection of natural character <i>The natural character of the Timaru District's wetlands and rivers and their margins is preserved and protected from inappropriate subdivision, use and development, and <u>the enhancement of natural character is encouraged where possible enhanced.</u></i>
Alliance Group Limited	173.61	NATC - Natural Character	Policies	NATC-P2 Restoration and enhancement	Supports encouraging enhancement actions rather than require them.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.62	NATC - Natural Character	Policies	NATC-P3 Incentives	Support the policy direction about the use of incentives for ecological restoration as an appropriate method to achieve NATC-O1.	Retain as notified.
Alliance Group Limited	173.63	NATC - Natural Character	Policies	NATC-P4 Preservation of natural character from inappropriate subdivision, use and development	Considers the direction under NATC-P4 to 'only allow' activities that restore riparian margins is a distinct departure from the direction of NATC-P2 to 'provide for and encourage' restoration. Furthermore, the definition of 'riparian margins' mean these areas are reasonably large, and there is the possibility this policy places a restoration burden on these areas out of step with the effects of the proposal.	Amend NATC-P4 as follows: NATC-P4 Preservation of natural character from inappropriate subdivision, use and development <i>Preserves the natural character values of riparian margins by only allowing subdivision, use and development that:</i> [...].
Alliance Group Limited	173.64	NATC - Natural Character	Rules	NATC-R1 Vegetation clearance	Supports a permitted activity status, with a default restricted discretionary consenting pathway, for vegetation clearance in a riparian margin.	Retain as notified.
Alliance Group Limited	173.65	NATC - Natural Character	Rules	NATC-R3 Earthworks	Provision of a permitted activity status with a default restricted discretionary consenting pathway, for earthworks in a riparian margin, is supported. Although an amendment is sought to facilitate earthworks associated riparian restoration activities.	Amend NATC-R3 Earthworks as follows: NATC-R3 Earthworks Riparian margins of a river that is not an HNWB Activity status: Permitted [...] <u>PER-X</u> <u>The earthworks are to restore or enhance the natural character or ecological values of the riparian margin</u>
Alliance Group Limited	173.66	NATC - Natural Character	Rules	NATC-R4 Construction of fences	Supports a permitted activity status for post-and-wire fences in a riparian margin.	Retain as notified.
Alliance Group Limited	173.67	NATC - Natural Character	Rules	NATC-R5 Buildings and structures excluding fences	Supports a restricted discretionary consenting pathway for buildings and structures, excluding fences in non-HNWB riparian margins.	Retain as notified.
Alliance Group Limited	173.68	PA - Public Access	Objectives	PA-O1 Public Access	Considers the term 'desirable' does not infer an evidence based approach. It should be clarified that the provision of public access should be restricted where necessary.	Amend PA-O1 as follows: PA-O1 Public Access <i>Public access to and along the coastal marine area and the margins of identified wetlands and rivers is maintained and enhanced, and only restricted where desirable-necessary.</i>
Alliance Group Limited	173.69	PA - Public Access	Policies	PA-P2 Requirements for public access	Supports the consideration of operational requirements as per sub-clause (5) and of public safety risks as per sub-clause (6).	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.70	PA - Public Access	Policies	PA-P3 Design and construction of public access	Considers that in some areas, where public access along rivers and the coastal marine area is subject to riverine and coastal processes, the maintenance of an access design that meets Council standards may not be possible. As such, the policy direction should not foreclose on the ability to consider alternative design outcomes.	Amend PA-P3 as follows: PA-P3 Design and construction of public access <i>Ensure that all public access routes are designed in accordance with Council standards for recreational areas <u>where natural processes would not compromise the design.</u></i>
Alliance Group Limited	173.71	PA - Public Access	Policies	PA-P4 Limiting public access	Supports that an exemption be provided from the requirement to provide public access in cases when public health and safety issues would arise from providing public access.	Retain as notified.
Alliance Group Limited	173.72	PA - Public Access	Rules	PA-R1 Any new land use, subdivision or development	Opposes this rule as it is unclear how this provision is intended to work with respect to sites in the GIZ. The submitter's site includes a GIZ site > 5,000m ² that adjoins the Public Access Provision Overlay ('PAPO') along the foreshore. The rule is silent on the foreshore PAPO. The purpose and mechanics of this rule are unclear and clarification is sought	Delete PA-R1 Any new land use, subdivision or development.
Alliance Group Limited	173.73	SUB - Subdivision	Objectives	SUB-O3 Rural subdivision	The potential for subdivision to cause reverse sensitivity effects on existing industrial activities in rural areas, and major hazard facilities is recognised in this objective.	Amend SUB-O3 as follows: SUB-O3 Rural subdivision [...] <i>4. minimise reverse sensitivity effects on intensive primary production <u>and existing industrial activities in any zone.</u></i>
Alliance Group Limited	173.74	SUB - Subdivision	Policies	SUB-P5 Reverse Sensitivity	Amend so that subdivision design is also cognisant of interfaces with non-residential zones.	Amend SUB-P5 as follows: SUB-P5 Reverse Sensitivity <i>Only allow subdivision that does not result in reverse sensitivity effects that would compromise the operation of regionally significant infrastructure/facilities and legally established intensive primary production <u>or industrial activities.</u></i>
Alliance Group Limited	173.75	SUB - Subdivision	Policies	SUB-P9 Residential subdivision	A minor amendment is appropriate to align sub-clause SUB-P9(7) with the direction of SUB-P5.	Amend SUB-P9 as follows: SUB-P9 Residential subdivision <i>Require residential subdivision to accord with the purpose, character and qualities of the zone, and maintain and enhance amenity values, by ensuring:</i> [...] <i>conflict between residential activities and adjoining land uses <u>are avoided or minimised including by integrating buffers between new lots and adjoining zones.</u></i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.76	SUB - Subdivision	Policies	SUB-P14 Rural allotments	It is not sufficient to allow a small-lot rural zone subdivision simply to retain the average dwelling density anticipated for the zone. And also to amend that new allotments do not facilitate the development of rural-residential dwellings in the environs of activities like the Smithfield processing site.	Amend SUB-P14 as follows: SUB-P14 Rural allotments Avoid subdivision that creates allotments that are less than the required minimum allotment size within the General Rural Zone and Rural Lifestyle Zone unless: [...] 2. the non-compliance is minor, and the subdivision maintains the dwelling density anticipated for the zone <u>and does not facilitate the establishment of sensitive activities with reverse sensitivity effects on existing rural and industrial activities; or and</u> [...]
Alliance Group Limited	173.77	SUB - Subdivision	Standards	SUB-S1 Allotment sizes and dimensions	Supports having the 40-hectare minimum lot size specified in the GRUZ and for no minimum lot size to be specified for land in the GIZ. Supports the respective purposes of these zones.	Retain as notified.
Alliance Group Limited	173.78	CE - Coastal Environment	Objectives	CE-O2 Quality of the Coastal Environment	Supports the intent of this policy and agrees that access should only be provided where it is safe to do so.	Retain as notified.
Alliance Group Limited	173.79	CE - Coastal Environment	Objectives	CE-O5 Natural features and buffers	Supports that where there is existing development within coastal hazard areas it is not be appropriate to use natural features and buffers to manage the hazards because there may be insufficient buffer space. The words "wherever appropriate" appropriately provide for this scenario.	Retain as notified.
Alliance Group Limited	173.80	CE - Coastal Environment	Objectives	CE-O6 Existing urban activities	Supports that parts of the coastal environment are highly modified by urban activities which includes industrial activities.	Retain as notified.
Alliance Group Limited	173.81	CE - Coastal Environment	Policies	CE-P1 Identifying the Coastal Environment	Supports the mapping of the coastal environment to align with Policy 1 (Extent and characteristics of the coastal environment) of the New Zealand Coastal Policy Statement.	Retain as notified.
Alliance Group Limited	173.82	CE - Coastal Environment	Policies	CE-P2 Identifying areas of high coastal natural character	Supports the mapping of areas of high coastal natural character to align with Policy 13(1)(c) of the New Zealand Coastal Policy Statement.	Retain as notified.
Alliance Group Limited	173.83	CE - Coastal Environment	Policies	CE-P4 Role of natural features and vegetation	Supports natural topographic features that assist in avoiding or mitigating the risk to human life and property from coastal hazards are only restored where practicable.	Retain as notified.
Alliance Group Limited	173.84	CE - Coastal Environment	Policies	CE-P7 Restoration or rehabilitation of natural character	This policy is broadly consistent with Policy 14 (Restoration of natural character) of the NZCPS and therefore supported.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.85	CE - Coastal Environment	Policies	CE-P9 Anticipated activities	Considers it is appropriate that activities be allowed that are consistent with the qualities of the zone.	Retain as notified.
Alliance Group Limited	173.86	CE - Coastal Environment	Policies	CE-P10 Preserving the natural character of the Coastal Environment	Considers this policy is generally consistent with NZCPS Policy 13 (Preservation of natural character). Minor amendments are appropriate to improve the precision of the policy though.	Amend CE-P10 as follows: CE-P10 Preserving the natural character of the Coastal Environment Enable subdivision, use and development outside of areas of coastal high natural character that: 1. avoids significant adverse effects <u>on areas within the Coastal Environment Area Overlay</u> ; and 2. avoids, remedies or mitigates any other adverse effects on the qualities that contribute to the natural character of <u>areas within</u> the Coastal Environment <u>Area Overlay</u> ; while recognising that: [...]
Alliance Group Limited	173.87	CE - Coastal Environment	Policies	CE-P11 Preserve the natural character qualities of areas with Coastal High Natural Character	This policy is generally consistent with NZCPS Policy 13 (Preservation of natural character). Minor amendments are appropriate to improve the precision of the policy though. For example, the Coastal High Natural Character Overlay applies to land immediately adjacent to highly modified industrial and urban sites. Therefore, the reference in sub-clause (iii) to a sense of remoteness will not be universally applicable to all areas in the Coastal High Natural Character Overlay.	Amend CE-P11 as follows: CE-P11 Preserve the natural character qualities of areas with Coastal High Natural Character Only allow subdivision, use and development in areas of the <u>Coastal High Natural Character Overlay</u> where: 1. for infrastructure, the development is in accordance with EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure; and 2. for other activities: a. <u>the activity</u> avoids significant adverse effects <u>on the identified natural character qualities of the area in the Coastal High Natural Character Overlay</u> ; and b. avoids, remedies or mitigates all other adverse effects on the identified natural character qualities; and c. demonstrates that it is appropriate by ensuring that the area of Coastal High Natural Character continues to: d. recognise and provide for the on-going natural physical processes that have created the Coastal Environment; and i. retain the integrity of landforms and geological features; and ii. retain a sense of remoteness and wildness <u>where these are existing qualities</u> ; and [...]

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.88	CE - Coastal Environment	Policies	CE-P14 Hard engineering natural hazard mitigation within the Coastal Environment	Considers a minor amendment to clause 2 is warranted to recognise that changes to the coastal environment natural hazard profile may be acceptable in some cases - for example where some degree of new or increased coastal environment natural hazard risk is outweighed by the benefits of the natural hazard mitigation project.	Amend CE-P14 as follows: CE-P14 Hard engineering natural hazard mitigation within the Coastal Environment <i>Only allow hard engineering natural hazard mitigation within the coastal environment that reduces the risk of natural hazards when:</i> [...] <i>2. the construction of hard engineering measures will not increase the risk from coastal hazards on adjacent properties that are not protected by the hard engineering measures <u>unless the potential increased natural hazard risks can be appropriately avoided or mitigated;</u></i>
Alliance Group Limited	173.89	CE - Coastal Environment	Rules	CE-R3 Planting of trees and/or vegetation for conservation, restoration, natural hazard mitigation works or enhancement purposes	Considers the permitted activity status is appropriate for the planting of indigenous vegetation and vegetation for natural hazard mitigation works.	Retain as notified.
Alliance Group Limited	173.90	CE - Coastal Environment	Rules	CE-R4 Buildings and structures and extension (excluding Regionally Significant Infrastructure and fences)	Considers it is appropriate that buildings, structures and extensions be permitted in the Coastal Environment, acknowledging that they are controlled through the area-specific zone provisions which reflect the character and quality of those zones. The restricted discretionary activity status for buildings, structures and extensions in the Sea Water Inundation Overlay within an urban area that do not comply with the Permitted Activity requirements.	Retain as notified.
Alliance Group Limited	173.91	CE - Coastal Environment	Rules	CE-R6 Land disturbance	Considers it is appropriate to provide a permitted activity pathway for land disturbance works.	Retain as notified.
Alliance Group Limited	173.92	CE - Coastal Environment	Rules	CE-R9 Natural hazard mitigation works, including earthworks - maintenance, replacement and upgrading	Considers it is appropriate to provide for private natural hazard mitigation works subject to the criteria specified in this rule.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.93	CE - Coastal Environment	Rules	CE-R12 Natural hazard mitigation works, including Earthworks - New	The submitter considers a non-complying consent pathway for private natural hazard mitigation is inappropriate given the investment in the site and seeks a discretionary activity. This would be consistent with the activity status for activities in the Coastal Environment Overlay (CE-R9) and natural hazard mitigation works undertaken by the Crown or a Council (CE-R12, RDIS-1) to allow the submitter to protect their assets.	Amend CE-R12 as follows: CE-R12 Natural hazard mitigation works, including earthworks - New <i>This rule does not apply to natural hazard mitigation works only involving the planting of vegetation.</i> <i>Coastal High Natural Character Area Overlay Coastal Erosion Overlay Sea Water Inundation Overlay Activity status: Restricted Discretionary.</i> [...] Activity status when compliance not achieved: Non-complying Discretionary [....].
Alliance Group Limited	173.94	CE - Coastal Environment	Standards	CE-S1 Height of buildings and structures	Supports the need for an adequate maximum height in the GIZ.	Retain as notified.
Alliance Group Limited	173.95	CE - Coastal Environment	Standards	CE-S2 Site coverage	Support the need for adequate site coverage in the GIZ.	Retain as notified.
Alliance Group Limited	173.96	CE - Coastal Environment	Standards	CE-S3 Building and structure external materials	Supports providing a permitted status for new buildings and structures. Although seeks an amendment to clarify that the rule does not apply to interior surfaces.	Amend CE-S3 as follows: CE-S3 Building and structure external materials <i>Coastal Environment Overlay</i> <i>With the exception of the Port Zone, <u>all external cladding and roofing of</u> buildings and structures must be finished in materials with a maximum reflectance value of 30%.</i>
Alliance Group Limited	173.97	EW - Earthworks	Objectives	EW-O1 Earthworks activity	Considers that it should be recognised that earthworks are necessary for development and that adverse effects associated with them should be avoided or mitigated.	Retain as notified.
Alliance Group Limited	173.98	EW - Earthworks	Policies	EW-P1 Benefits and necessity	Considers that it should be recognised that earthworks are necessary for development.	Retain as notified.
Alliance Group Limited	173.99	EW - Earthworks	Policies	EW-P5 Land stability	Considers the policy is unduly restrictive insofar as it does not clearly recognise that land stability is an inherent part of earthworks design.	Amend EW-P5 as follows: EW-P5 Land stability <i>Only allow earthworks on steeper slopes and in proximity to boundaries where <u>they will not impact potential adverse effects</u> on land <u>stability are avoided or mitigated.</u></i>
Alliance Group Limited	173.100	EW - Earthworks	Standards	EW-S1 Areas	Considers the allowance for 2,000 m ² of earthworks per 12-month period in the GIZ.	Retain as notified with respect to the GIZ.
Alliance Group Limited	173.101	LIGHT - Light	Objectives	LIGHT-O2 Benefits of artificial lighting	Considers it is appropriate to recognise the benefits of artificial lighting.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.102	LIGHT - Light	Rules	LIGHT-R2 Outdoor artificial lighting for health and safety	<p>The entirety of the submitter's Smithfield site is within the Light Sensitive Areas Overlay corresponding to the Wāhi taoka Overlay.</p> <p>The submitter undertakes activities that require lighting for health and safety purposes that are not temporary activities and therefore not a permitted activity (PER-2), so lighting on the site for health and safety purposes would require a consent as a non-complying activity. The submitter considers this is not appropriate for an industrial site with night-time activities.</p>	<p>Amend LIGHT-R2 as follows:</p> <p>LIGHT-R2 Outdoor artificial lighting for health Light Sensitive Areas</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1</p> <p>The lighting is for health and safety purposes; and</p> <p>PER-2</p> <p>1. The lighting is for: a permitted temporary activity; or</p> <p>2. any other temporary activity that has a duration of no longer than six months; and</p> <p>PER-3</p> <p>[...]</p>
Alliance Group Limited	173.103	LIGHT - Light	Rules	LIGHT-R3 Outdoor artificial lighting within Light Sensitive Areas not listed in LIGHT-R2	<p>The entirety of the submitter's Smithfield site is within the Light Sensitive Areas Overlay corresponding to the Wāhi taoka Overlay.</p> <p>The submitter undertakes activities requiring lighting for health and safety purposes 24 hours per day, so lighting on the site would require a consent as a non-complying activity. This is not appropriate for an industrial site with night-time activities.</p>	<p>Amend LIGHT-R3 as follows:</p> <p>LIGHT-R3 Outdoor artificial lighting within Light Sensitive Areas not listed in LIGHT-R2</p> <p>Light Sensitive Areas</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1</p> <p>LIGHT-S1 and LIGHT-S2 are complied with; and</p> <p>PER-2</p> <p>The outdoor artificial lighting must:</p> <p>1. be fully shielded (see Figure 18 - Lighting Fixtures); and</p> <p>2. have a colour corrected temperature of no greater than 3000K (warm white); and</p> <p>3. be installed in a manner that precludes operation between 10pm and 7am the following day.</p> <p>Activity status when compliance not achieved: Non-complying.</p>
Alliance Group Limited	173.104	NOISE - Noise	Objectives	NOISE-O1 Activities that generate noise	Seeks an amendment for clarification as noise only needs to be managed to the extent that it is received in a zone.	<p>Amend NOISE-O1 as follows:</p> <p>NOISE-O1 Activities that generate noise</p> <p>Noise effects generated by activities are compatible with the purpose, character and qualities of each <u>receiving</u> zone and do not compromise the health and well-being of people and communities.</p>
Alliance Group Limited	173.105	NOISE - Noise	Objectives	NOISE-O2 Reverse sensitivity	Considers it is appropriate to recognise and protect activities with inherent noise-generating elements, from reverse sensitivity.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.106	NOISE - Noise	Policies	NOISE-P1 Maintenance of zone character and qualities	Considers it is appropriate to provide for noise-generating activities commensurate with the zoning that applies.	Retain as notified.
Alliance Group Limited	173.107	NOISE - Noise	Policies	NOISE-P5 Reverse sensitivity	Considers it is appropriate to require that the burden of mitigation falls to sensitive activities seeking to locate in/near noisy environments rather than the reverse. Also notes that “higher noise environments” includes “Residential zones in close proximity to any General industrial zone...” this is considered acceptable.	Retain as notified.
Alliance Group Limited	173.108	NOISE - Noise	Rules	NOISE-R9 Any new building for use by a noise sensitive activity and alterations to existing buildings for use by a noise sensitive activity (not listed in NOISE-R12)	It is appropriate to require new noise sensitive activities to be designed to mitigate noise where they locate near existing sources of noise, such as industrial zones.	Retain as notified.
Alliance Group Limited	173.109	RELO - Relocated Buildings and Shipping Containers	Policies	RELO-P1 Relocated buildings and shipping containers in General Industrial Zone	Considers it is appropriate to provide for these activities in the GIZ with greater flexibility than in other zones.	Retain as notified.
Alliance Group Limited	173.110	RELO - Relocated Buildings and Shipping Containers	Rules	RELO-R1 Placement of a relocated building	Considers it is appropriate to permit this activity in the GIZ without any further restrictions.	Retain as notified.
Alliance Group Limited	173.111	RELO - Relocated Buildings and Shipping Containers	Rules	RELO-R2 Placement of a shipping container	Considers it is appropriate to permit this activity in the GIZ without any further restrictions	Retain as notified.
Alliance Group Limited	173.112	GRUZ - General Rural Zone	Objectives	GRUZ-O1 Purpose of the General Rural Zone	Supports recognising that the General Rural Zone predominantly provides for primary production and a limited range of activities that support primary production.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.113	GRUZ - General Rural Zone	Objectives	GRUZ-O2 Character and qualities of the General Rural Zone	The submitter agrees with the clear recognition of the working environment characteristic of land in the GRUZ.	Retain as notified.
Alliance Group Limited	173.114	GRUZ - General Rural Zone	Objectives	GRUZ-O3 Protecting primary production	Considers it is appropriate to provide strong directions about the types of activities that should be excluded from the GRUZ. Therefore, seeks a minor amendment would clarify this.	Amend GRUZ-O3 as follows: GRUZ-O3 Protecting primary production
						<i>The land resource of the General Rural Zone is not diminished by activities with no functional or operational need to locate in the General rural zone, and primary production is protected from <u>encroachment by</u> sensitive activities.</i>
Alliance Group Limited	173.115	GRUZ - General Rural Zone	Objectives	GRUZ-O4 Protecting sensitive activities and sensitive zones	Notes sub-clause (1) appears to require rural activities to respond to encroachment by incompatible sensitive activities, otherwise will be inconsistent with the direction of GRUZ-O3. While it may be feasible to manage effects on existing sensitive activities in rural areas, it would not be appropriate for policy to constrain primary production, mining, quarrying etc. if a new sensitive activity establishes in the area. Considers sub-clause 2 as ambiguous.	Amend GRUZ-O4 as follows: GRUZ-O4 Protecting Managing sensitive activities and sensitive zones <i>Intensive primary production, mining, quarrying, <u>rural industry</u> and other intensive activities <u>avoid or minimise generates no or minimal</u> adverse effects on:</i> <i>1. <u>existing</u> sensitive activities; and</i> <i>2. land close to in Residential, Rural-sSettlement, Māori Purpose and Open space zones.</i>
Alliance Group Limited	173.116	GRUZ - General Rural Zone	Policies	GRUZ-P1 Primary production activities	The submitter recommends an amendment to ensure that the establishment of new incompatible activities in the GRUZ do not inadvertently receive policy support.	Amend GRUZ-P1 as follows: GRUZ-P1 Primary production activities <i>Enable a range of primary production activities, where they:</i> <i>[...]</i> <i>3. meet the standards and requirements to minimise adverse effects on <u>existing</u> sensitive activities and the environment.</i>
Alliance Group Limited	173.117	GRUZ - General Rural Zone	Policies	GRUZ-P2 Character and qualities of the General Rural Zone	It is appropriate to reiterate the principle of land use separation, in order to discourage sensitive activities from constraining rural activities.	Retain as notified.
Alliance Group Limited	173.118	GRUZ - General Rural Zone	Policies	GRUZ-P9 Workers accommodation	Considers it is appropriate for workers accommodation in the GRUZ.	Retain as notified.
Alliance Group Limited	173.119	GRUZ - General Rural Zone	Rules	GRUZ-R4 Residential units, excluding seasonal workers accommodation and permanent workers accommodation	Considers it is appropriate to only provide for a low density of residential development in the GRUZ, to support the UFD objectives, including the separation of incompatible activities.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.120	GRUZ - General Rural Zone	Rules	GRUZ-R9 Residential visitor accommodation	Considers it is appropriate to heavily restrict this activity in the GRUZ, given the potential for it to generate reverse sensitivity effects that constrain legitimate primary production and supporting activities.	Retain as notified.
Alliance Group Limited	173.121	GRUZ - General Rural Zone	Rules	GRUZ-R19 Seasonal workers accommodation	Considers it is appropriate to provide for seasonal worker accommodation in the GRUZ as a permitted activity, or as a restricted discretionary activity where standards are not met.	Retain as notified.
Alliance Group Limited	173.122	GRUZ - General Rural Zone	Rules	GRUZ-R20 Permanent workers accommodation	Considers it is appropriate to provide for permanent worker accommodation in the GRUZ as a permitted activity, or as a restricted discretionary activity where standards are not met.	Retain as notified.
Alliance Group Limited	173.123	GRUZ - General Rural Zone	Rules	GRUZ-R21 Rural industry	Considers a Restricted Activity status for Rural industry in the General Rural Zone is appropriate.	Retain as notified.
Alliance Group Limited	173.124	GRUZ - General Rural Zone	Rules	GRUZ-R27 Expansion of existing legally established industrial activities, excluding mines and quarries	Considers it is appropriate to provide for the expansion of existing industry with a discretionary consenting pathway.	Retain as notified.
Alliance Group Limited	173.125	GRUZ - General Rural Zone	Standards	GRUZ-S4 Setbacks for sensitive activities	Considers it is appropriate to restrict the siting of sensitive activities. But considers the standard is also applied to supporting activities that are similarly vulnerable to reverse sensitivity effects.	Amend GRUZ-S4 as follows: GRUZ-S4 Setbacks for sensitive activities 1. No new sensitive activity may be established within 500m from: a. the closest outer edge of any paddocks, hard-stand areas, structures or buildings used to house stock, or treatment systems, used for an intensive primary production activity or rural industry ; and b. an existing farm effluent disposal area; and c. a lawfully established quarry or mine. 2. No new building for a sensitive activity may be erected within 20m from any other site boundary in a different ownership where a primary production or rural industry activity is being conducted, unless the site existed prior to 22 September 2022, in which case a 10m setback applies; [...]
Alliance Group Limited	173.126	GRUZ - General Rural Zone	Standards	GRUZ-S5 Intensive primary production activities and new farm effluent disposal areas	Considers the standard is appropriately targeted to address the potential effects of new farm effluent disposal areas.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.127	LFRZ - Large Format Retail Zone	Policies	LFRZ-P6 Other activities	The submitters Smithfield site is immediately adjacent the Large Format Retail Zone and is sensitive to reverse sensitivity effects. It is appropriate that this is also recognised in this provision.	Amend LFRZ-P6 Other activities as follows: LFRZ-P6 Other activities Only allow other activities to establish and operate within the Large Format Retail Zone where they: 1. are compatible with the purpose, character and qualities of the zone; and [...] 4. Reverse sensitivity effects on are appropriately avoided or mitigated.
Alliance Group Limited	173.128	LFRZ - Large Format Retail Zone	Rules	LFRZ-R13 Community facilities	Considers the non-complying activity status for these activities is appropriate due to potential reverse sensitivity issues on its site.	Retain as notified.
Alliance Group Limited	173.129	GIZ - General Industrial Zone	Introduction	Introduction	Considers the Introduction adequately expresses the role of the GIZ.	Retain as notified.
Alliance Group Limited	173.130	GIZ - General Industrial Zone	Objectives	GIZ-O1 The purpose of the General Industrial Zone	Considers it is appropriate to recognise the economic contribution that industry makes and provide for a range of industry. Given there are no other industrial zones provided, The submitter considers the objective should also recognise ancillary activities.	Amend GIZ-O1 as follows: GIZ-O1 The purpose of the General Industrial Zone The General Industrial Zone provides for a range of industrial activities, ancillary activities and other compatible activities that contribute to the economic wellbeing of the District.
Alliance Group Limited	173.131	GIZ - General Industrial Zone	Objectives	GIZ-O2 Character and qualities of the General Industrial Zone	Considers sub-clause 7 is too prohibitive, and instead an objective that provides better direction for adverse effects beyond the GIZ boundaries to be managed is more appropriate. The submitter also considers the requirement to landscape all road frontages is impractical.	Amend GIZ-O2 as follows: GIZ-O2 Character and qualities of the General Industrial Zone The character and qualities of the General Industrial Zone comprise: [...] 7. buildings and activities that do not compromise the amenity of adjoining Residential and Open Space and Recreation Zones; and the management of adverse effects on existing activities in adjoining Residential, Open Space and Recreation and Special Purpose zones. 8. landscape planting and screening along road frontages and Open Space and Recreation Zones.
Alliance Group Limited	173.132	GIZ - General Industrial Zone	Objectives	GIZ-O3 Use and development in the General Industrial Zone	The submitters site and operations should not be compromised by the establishment of sensitive activities as described in clause (2), but the site should not have to comply with clause (3), particularly where activities in these other zones have been established after the submitter's industrial activity was established. The submitter considers the requirement to maintain the amenity of adjacent Residential and Open Space zone is also inconsistent with the inherent characteristics/qualities of industry described in sub-clauses (1) to (4) of GIZ-O2.	Amend GIZ-O3 as follows: GIZ-O3 Use and development in the General Industrial Zone 1. is located so that it can be appropriately serviced by infrastructure; and 2. is not compromised by the establishment of sensitive activities.; and 3. does not compromise the strategic role and function of any of the Commercial and Mixed Use Zones; and 4. effects on the maintains the amenity values of adjacent Residential and Open Space and Recreation Zones are minimised.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.133	GIZ - General Industrial Zone	Policies	GIZ-P1 Industrial activities	Considers the policy does not adequately support industry, particularly as there is no other industrial Zones. Considers it is appropriate to qualify the circumstances when ancillary activities to industry are allowed to apply.	Amend GIZ-P1 as follows: GIZ-P1 Industrial activities Enable a range of industrial activities and <u>ancillary associated</u> activities. <i>where:</i> 1. ancillary activities are conducted on the same site as the primary industrial activity; and 2. does not include residential activities; and 3. they are compatible and complementary to the purpose, character and qualities of the General Industrial Zone.
Alliance Group Limited	173.134	GIZ - General Industrial Zone	Policies	GIZ-P2 Off-site industrial ancillary activities	Considers the strict regulatory stance towards offsite ancillary industrial activities is inappropriate and unsupported by a s32. The submitter considers the zone and s32 report misapprehend the difference between ancillary activities to industry and non-industrial activities that have no relationship to industry. Ancillary activities that have a rightful place in the GIZ should not be constrained. Rule GIZ-R2 already provides sufficient regulatory control. [see original submission for full reason]	Delete GIZ-P2 Off-site industrial ancillary activities .
Alliance Group Limited	173.135	GIZ - General Industrial Zone	Policies	GIZ-P3 Streetscape and amenity values	Considers the clarity of the policy could be improved.	Amend GIZ-P3 as follows: GIZ-P3 Streetscape and amenity values Maintain the amenity values of the streetscape, the Residential Zones, and Open Space and Recreation Zones, by requiring: 1. <u>outdoor</u> storage areas to be screened from road boundaries and Residential Zones; and 2. landscaping along road boundaries and boundaries that adjoining the Open Space and Recreation Zones; and 3. buildings and structures to be a height and setback that will ensure <u>activities in</u> adjoining Residential zones and Open Space and Recreation Zones: a) have a reasonable standard of sunlight access; and b) are not unreasonably dominated by built form; and c) maintain privacy of <u>residential activities in any</u> adjoining Residential Zones; and [...]
Alliance Group Limited	173.136	GIZ - General Industrial Zone	Policies	GIZ-P4 Industrial and trade waste connections	Considers it is appropriate to ensure activities that rely on the trade waste system are not enabled unless sufficient capacity is available in that system.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.137	GIZ - General Industrial Zone	Policies	GIZ-P5 Offensive trades	The submitters considers since there is no other industrial zones and within GRUZ, offensive trades have a non-complying status, the GIZ should enable offensive trades, subject to standard regulatory direction to require the management of effects on other activities and on nearby non-industrial zones..	Amend GIZ-P5 as follows: GIZ-P5 Offensive trades <i>Ensure offensive trades manage adverse effects on other activities and any adjacent non-industrial zone(s).</i> <i>Only allow offensive trades to establish in the General Industrial Zone where:</i> <i>1. the activity is located in a manner that will maintain the amenity values of adjacent zones; and</i> <i>2. the activity and buildings is designed in a way that contains or minimises nuisance effects.</i>
Alliance Group Limited	173.138	GIZ - General Industrial Zone	Policies	GIZ-P6 Other activities	Considers the clarity of the policy should be improved.	Amend GIZ-P6 as follows: GIZ-P6 Other activities Avoid the establishment of <i>non-industrial other-activities including residential activities</i> unless: [...].
Alliance Group Limited	173.139	GIZ - General Industrial Zone	Rules	GIZ-R1 Industrial activity Trade supplier	Considers it is appropriate that this rule permits industrial and compatible activities and provides fallback controlled or restricted discretionary consenting pathways for activities that breach the permitted activity standards.	Amend GIZ-R1 as follows: GIZ-R1 Industrial activity PER-1
				Laboratories Service stations Motor garage Emergency services facilities Veterinary clinics Excluding any industrial ancillary activity and offensive trades	Considers the rule should provide for outdoor storage.	<i>The activity and its buildings and structures (excluding fences and outdoor storage) are located more than 50 metres from any Residential Zones or Rural Lifestyle Zone; and</i> [...].

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.140	GIZ - General Industrial Zone	Rules	GIZ-R2 Industrial ancillary activities	Considers the permitted and fallback statuses for ancillary activities is appropriate. Considers the restriction on residential activity at clause PER-2 should provide a discretionary consenting pathway for seasonal workers accommodation.	Amend GIZ-R2 as follows: <i>GIZ-R2 Industrial ancillary activities</i> <i>Activity status: Permitted</i> <i>PER-2</i> <i>The activity does not include:</i> <i>1. a residential activity;</i> <i>2. <u>seasonal workers accommodation</u>); and</i> <i>[...]</i> <i>Activity status when compliance not achieved with PER-2.1: Non-complying</i> <i>Activity status when compliance not achieved with PER-2.2: Discretionary</i> <i>[...]</i>
Alliance Group Limited	173.141	GIZ - General Industrial Zone	Rules	GIZ-R3 Convenience stores, restaurants, cafes and take away food outlets	Considers the rule provides an appropriate framework for the management of food and beverage outlets.	Retain as notified.
Group Limited	173.142	GIZ - General Industrial Zone	Rules	GIZ-R4 Offensive trades, including associated buildings and structures	Considers the discretionary activity status is appropriate.	Retain as notified.
Alliance Group Limited	173.143	GIZ - General Industrial Zone	Rules	GIZ-R5 Any other activity, including associated buildings and structures not otherwise listed in this chapter	Considers it is appropriate to restrict encroachment by non-industrial activities into the GIZ, given the high sensitivity of industrial activities to compromise by reverse sensitivity effects.	Retain as notified.
Alliance Group Limited	173.144	GIZ - General Industrial Zone	Standards	GIZ-S2 Maximum height of buildings and structures	Considers the maximum building height limit is appropriate.	Retain as notified.
Alliance Group Limited	173.145	GIZ - General Industrial Zone	Standards	GIZ-S3 Setbacks of buildings and structures excluding fences	Considers the setback standards appropriately balance the functional needs of industrial development with responsiveness to interfaces with non-industrial zones.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.146	GIZ - General Industrial Zone	Standards	GIZ-S4 Building colour and reflectivity	Considers the colour limitation is excessive and unlikely to foster good visual amenity outcomes. Considers managing reflectivity should be covered.	Amend GIZ-S4 as follows: GIZ-S4 Building colour and reflectivity 1. The façade(s) of any building that is visible from and within 50 metres of the General Residential Zone must be painted or finished in a green, grey or tertiary (brown) colour and have a reflectivity value not exceeding 25%; and [...]
Alliance Group Limited	173.147	GIZ - General Industrial Zone	Standards	GIZ-S5 Outdoor storage	Considers the standard should provide greater clarity and should enable flexibility in the method of screening - other options than fencing may be available.	Amend GIZ-S5 as follows: GIZ-S5 Outdoor storage 1. Any outdoor storage areas must be set back 15m from any boundary that adjoins the Residential Zones; and 2. Any outdoor storage area that is located between 15m to 18m from any boundary that adjoins any Residential Zones must not exceed a maximum height of 6m; and 3. Any outdoor storage areas must be fully screened from view at ground level by a fence to a height of no less than 2m in height so that it is not visible from: [...]
Alliance Group Limited	173.148	GIZ - General Industrial Zone	Standards	GIZ-S6 Landscaping and bund(s)	Seeks an amendment as it is not necessary to require landscaping along all road frontages and zone boundaries simply because land is in the GIZ. Landscaping should only be required where there is a development/activity with visual effects requiring mitigation.	Amend GIZ-S6 as follows: GIZ-S6 Landscaping and bund 1. General Industrial Zone 1. A landscaping strip is required to mitigate visual effects must have a with minimum depth of 3m where located along any road boundary or boundary of a Residential Zone or Open Space and Recreation Zone; and [...]
Alliance Group Limited	173.149	NOSZ - Natural Open Space Zone	Policies	NOSZ-P6 Other activities	The submitter considers it is appropriate that other activities to only be allowed where they do not adversely affect the character and qualities of the surrounding area.	Retain as notified.
Alliance Group Limited	173.150	NOSZ - Natural Open Space Zone	Rules	NOSZ-R3 Planting of vegetation	The submitter notes that planting of trees and/or vegetation for natural hazard mitigation is enabled in rule CE-R3, including the use of non-indigenous vegetation. It is therefore appropriate that this be recognised in this rule.	Amend NOSZ as follows: NOSZ-R3 Planting of vegetation [...] PER-1 The planting is of indigenous species, except for planting for natural hazard mitigation.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alliance Group Limited	173.151	APP5 - Criteria for Identifying Significant Natural Areas	General	General	Considers it is appropriate to apply a methodology for the identification of SNAs that is consistent with the Canterbury RPS.	Retain as notified.
Alliance Group Limited	173.152	SCHED2 - Schedule of Major Hazard Facilities	SCHED2 - Schedule of Major Hazard Facilities	SHF-12	The submitters Smithfield site is shown on the e-Plan maps as SHF-12 - a significant hazard facility. However, it is not referenced in Schedule 2 as a major hazard facility and clarification is sought.	Clarify SCHED2 - Schedule of Major Hazard Facilities regarding the mapping of the Smithfield processing site as 'SHF-12' without listing the site in Schedule 2.
Alliance Group Limited	173.153	Planning Maps	Heritage Item overlay	HHI-23 Coast Defence	The submitter supports Historical Heritage Item HHI-23 being included in Schedule 3, although the location of HHI-23 as shown on the Heritage Item Overlay is approximately 100m to the southeast on the same site, therefore an amendment is sought to address this.	1. Amend mapping HHI-23 Coast Defence to reflect location of HHI-23. AND 2. Any consequential amendment to the Heritage Item Extent layer to reflect the above change including that it be sized suitably to manage the item.
Alliance Group Limited	173.154	SCHED16 - Schedule of Precincts and Specific Control Areas	SCHED16B - Schedule of Specific Control Areas Layer	Height Specific Control Area	The submitter supports this schedule insofar as the Height Specific Control Area is applied to the GIZ part of their site.	Retain as notified.
Rooney Holdings Limited	174.1	General	General	General	Considers the PTDP has been drafted as a restrictive planning document that seeks to micromanage the effects of many activities that have previously been permitted. The PTDP consistently goes that extra step in terms of restrictiveness and micromanagement compared to other district plans is unnecessary and will result in additional costs and delays without adding any value in terms of environmental outcomes and sustainable management.	Request the PTDP to be more enabling and restricts where necessary to achieve statutory requirements.
Rooney Holdings Limited	174.2	General	General	General	Considers the Proposed District Plan contains confusing and unnecessary overlap with consenting for Regional Council activities within the beds of rivers.	Amend the Proposed District Plan to avoid confusing and unnecessary overlap with consenting for Regional Council activities within the beds of rivers.
Rooney Holdings Limited	174.3	General	General	General	Considers the PTDP has been drafted to require significant areas of private land to be surrendered when subdivision or development occurs, even for minor activities such as boundary adjustment.	Not specified.
Rooney Holdings Limited	174.4	General	General	General	Considers policy direction in the PTDP provides for Council to take significant areas of land without any provision for compensation. Considers the land required by the PTDP is large, which would deter development. [Refer original submission for full reason]	Amend the Proposed District Plan to provide compensation to landowners where they are required/requested to provide land to provide for Council's future needs over and above the minimum requirements.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Rooney Holdings Limited	174.5	General	General	General	Considers land-based gravel extraction is important to continuity of supply and consistency of gravel quality. Request the proposed plan to introduce a gravel extraction overlay across land where existing land-based gravel extraction and clean fill deposition occurs. Such a layer should recognise and provide for this activity as well as protecting the sites from encroachment of sensitive activities in a way that the proposed plan has recognised and protected primary production.	Add a new Gravel Extraction Overlay with relevant provisions, which: 1. includes land where existing land-based gravel extraction and clean fill deposition occurs; and 2. recognise and provide for gravel extraction activity as well as protecting the sites from encroachment of sensitive activities in a way that the proposed plan has recognised and protected primary production.
Rooney Holdings Limited	174.6	Definitions	Definitions	Earthworks	The submitters support in part the definition of earthworks but submits that the definition be refined to exclude mining and quarrying as these activities have their own separate definitions and rules. Such an amendment avoids potential confusion, misalignment or misinterpretation when applying the relevant planning provisions to the relevant activities.	Amend definition of Earthworks as follows: <i>Earthworks means the alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock); but excludes gardening, cultivation, <u>mining, quarrying</u> and disturbance of land for the installation of fence posts.</i>
Rooney Holdings Limited	174.7	Definitions	Definitions	National Grid Subdivision Corridor	Oppose the definition as it goes beyond what is required by the relevant Code of Practice and Regulations providing an unfair advantage to the network provider potentially avoiding and/or frustrating the requirement to pay compensation under the Public Works Act 1981.	Amend definition of National Grid Subdivision Corridor to refer to the clearance distances specified by the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001) and the Electricity (Hazards from Trees) Regulations 2003.
Rooney Holdings Limited	174.8	Definitions	Definitions	National grid yard	Oppose the definition as it goes beyond what is required by the relevant Code of Practice and Regulations providing an unfair advantage to the network provider potentially avoiding and/or frustrating the requirement to pay compensation under the Public Works Act 1981.	Amend definition of National Grid Yard to refer to the clearance distances specified by the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001) and the Electricity (Hazards from Trees) Regulations 2003.
Rooney Holdings Limited	174.9	Definitions	Definitions	Outdoor lighting	Oppose the definition including the reference to interior lighting that emits directly into the outdoor environment. The definition should be refined to exclude artificial light from vehicles.	Amend definition of Outdoor Lighting as follows : <i>means any exterior or interior lighting (<u>excluding light emitted from vehicles</u>) that emits directly into the outdoor environment.</i>
Rooney Holdings Limited	174.10	Definitions	Definitions	Permanent workers accommodation	Oppose the definition as it only provides for full-time workers accommodation.	Amend definition of Permanent Workers Accommodation to provide for the accommodation of part-time workers of a primary production activity, or a rural industrial activity.
Rooney Holdings Limited	174.11	Definitions	Definitions	Quarrying activities	Support in part.	Amend definition of Quarrying Activities as follows: <i>Means the extraction, processing (including crushing, screening, washing, and blending), transport, storage, sale and recycling of aggregates (clay, silt, rock, sand), deposition <u>and removal of</u> overburden material, rehabilitation, landscaping and clean filling of the quarry, and the use of land and accessory buildings for offices, workshops and car parking areas associated with the operation of the quarry.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Rooney Holdings Limited	174.12	Definitions	Definitions	Riparian margin	The submitters oppose the definition. Defining the riparian margin based on the width of the riverbed is too generic and, in many situations, will be well outside the transitional zone. The riparian margin should be defined by a lesser distance such as 5 metres, or the Riparian Zone, whichever is the greater.	Amend the definition of Riparian Margin by reducing the 10-100m distance with a lesser distance such as 5 meters or the Riparian Zone, whichever is greater.
Rooney Holdings Limited	174.13	EI - Energy and Infrastructure	General	General	<p>Considers the provisions for renewable energy in the PTDP should be more enabling in line with the NPS for Renewable Energy Generation 2011.</p> <p>Considers a discretionary activity status for large scale (non-domestic) renewable generation does not achieve the policy intention of the NPS.</p>	<p>EI - Energy and Infrastructure</p> <ol style="list-style-type: none"> 1. Amend the provisions for renewable energy to be more enabling in line with the NPS for Renewable Energy Generation 2011 2. Add a new permitted activity rule to permit large scale solar arrays on existing buildings in industrial and rural zones; and 3. And add a new enabling policy to encourage and promote large scale solar arrays to generate renewable electricity.
Rooney Holdings Limited	174.14	EI - Energy and Infrastructure	Rules Section C - Rules for network utilities - Three Waters	EI-R26 Construction of new underground and above ground water systems infrastructure, including:...	<p>Oppose Rule EI-26(2). The rule requires a RDA land use consent for all plumbing and drainage work associated with a water supply, wastewater system, and stormwater infrastructure, whether above or below ground in all zones except Rural. This rule in itself would make most subdivisions at least RDA activity, and duplicate Subdivision Consent, Building Consent and Service Consent assessments.</p> <p>Consider the resource consent required under this rule is unnecessary.</p>	Delete EI-R26 .
Rooney Holdings Limited	174.15	EI - Energy and Infrastructure	Rules Section E - Rules for Renewable Electricity Generation	EI-R32 The installation, operation, maintenance, upgrading and removal of a solar cell or any array of solar cells for a small-scale renewable electricity generation and its use.	<p>Considers EI-R32.1 is unnecessary as it does not provide for excess electricity to be supplied back into the National Grid in the Rural Lifestyle Zone as a permitted activity. This rule captures any property that supplements mains supply with renewable electricity generation such as solar panels and provides excess electricity to the National Grid. Therefore, discouraging not enabling renewable energy implementation and development.</p>	<p>Amend EI-R32 by:</p> <ol style="list-style-type: none"> 1. Deleting EI-R32.1 for Rural Lifestyle Zone 2. Change EI-R32.2 to apply to all zones.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Rooney Holdings Limited	174.16	EI - Energy and Infrastructure	Rules Section E - Rules for Renewable Electricity Generation	EI-R35 The installation and upgrading of large-scale renewable electricity generation activities	Opposes EI-R35. It is submitted that a discretionary activity rule will not enable and facilitate large scale renewable energy generation facilities such as solar arrays on large buildings. The proposed plan should include an enabling policy and a permitted activity rule to provide for large scale solar arrays, especially on existing buildings within industrial or rural zones where electricity will be returned to the national grid on a commercial scale.	1. Amend EI-R35 The installation and upgrading of large-scale renewable electricity generation activities to exclude solar arrays. And 2. Include new policy and rules to enable large scale solar arrays as requested earlier.
Rooney Holdings Limited	174.17	Planning Maps	Birdstrike Management Area		Opposes in part the BMAO. The overlay unnecessarily encroaches on Future Development Area (FDA) 14.	Amend the Birdstrike Management Overlay to avoid FDA14.
Rooney Holdings Limited	174.18	SW - Stormwater Management	Section A: Activities in the Residential Zones, Rural Lifestyle	SW-R3 Non-Residential activities that include impervious	Support in part. Considers the rule requires clarification to enable it to be easily applied and understood.	Amend the rule heading of SW-R3 as follows:
			Zone, Settlement Zone and Māori Purpose Zone	surfaces of 500m ² or greater for carparking, excluding stormwater discharges that are authorised by a resource consent from the canterbury regional council prior to the relevant regional plan		<i>SW-R3 Non-Residential activities that include impervious surfaces of 500m² or greater for car parking, excluding stormwater discharges that are authorised by a resource consent from the Canterbury Regional Council <u>or is permitted</u> pursuant to the relevant Regional Plan.</i>
Rooney Holdings Limited	174.19	SW - Stormwater Management	Section D: Activities in all zones	SW-R7 The installation of any copper, galvanised metal, unpainted zincalume or any other unpainted metal, used in roof materials, gutters, downpipes or external cladding of buildings or structures	The submitters have a neutral position SW-R7 as the effects of the rule are still being assessed.	Not specified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Rooney Holdings Limited	174.20	SW - Stormwater Management	Standards	SW-S1 Rainwater storage systems	The submitters oppose this standard applying to DEV2 - Gleniti Residential Development Area as the Gleniti bund and swale network has been designed to capture additional post development stormwater flows from this area.	Amend SW-S1 Rainwater Storage Systems to exclude DEV2 - Gleniti Residential Development Area from this standard.
Rooney Holdings Limited	174.21	TRAN - Transport	Policies	TRAN-P1 Active transport	Oppose TRAN-P1(5) using the word “requiring”. Considers Council should be encouraging and promoting cycle parking, not requiring it, as it is not appropriate in all circumstances.	Amend TRAN-P1 as follows: TRAN-P1 Active transport <i>Encourage active transport modes such as cycling and walking by:</i> <i>1.ensuring safe pedestrian access to building entrances;</i> <i>2.requiring permeable road layouts;</i> <i>3.requiring footpaths and other active transport infrastructure;</i> <i>4.requiring consolidated settlement patterns;</i> <i>5.requiring encouraging secure, sheltered cycle parking that is located in a convenient and safe position and which ensures pedestrian safety; and</i> <i>6.encouraging the provision of end-Of-journey facilities for staff such as bicycle parking, showers, lockers and dedicated changing spaces.</i>
Rooney Holdings Limited	174.22	TRAN - Transport	Policies	TRAN-P8 Parking, loading and manoeuvring	Oppose TRAN-P8(3) as the policy duplicates the requirements of the Building Act 2004.	Amend TRAN-P8 as follows: TRAN-P8 Parking, loading and manoeuvring <i>Require land use activities to provide:</i> <i>1. efficient, effective and safe servicing and vehicle manoeuvring facilities on-Site, including for emergency service vehicles;</i> <i>2. accessible parking spaces on-Site for non-Residential activities with a large floor area;</i> <i>3. safe access for pedestrians and cyclists through parking areas, that are designed to reduce opportunities for crime through the demonstrated implementation of CPTED; and</i> <i>4. 3.landscaping in provided parking areas that visually softens the dominant effect of hard surfaces and positively contributes to amenity values.</i>
Rooney Holdings Limited	174.23	TRAN - Transport	Rules	TRAN-R11 New private roads, roads and other land transport infrastructure outside of existing road or rail corridors	There is no definition of a Private Road. Any combined private access appears to meet the definition of a Private Way.	Add a definition of “Private Way” to the definition section or remove the reference to Private Way in TRANS-R11 .

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Rooney Holdings Limited	174.24	TRAN - Transport	Standards	TRAN-S1 Landscaping where five or more at grade car parking spaces are provided for non- Residential activities on a site	The submitters oppose TRAN-S1. Limiting landscaping to indigenous species and requiring a 40mm minimum diameter (indigenous) tree, as well as being required to source the plantings from within the ecological district is unnecessarily onerous and expensive, let alone potentially difficult to source.	Amend TRAN-S1 with the following changes: TRAN-S1 Landscaping where five or more at grade car parking spaces are provided for non-Residential activities on a site 1. to encourage but not mandate indigenous planting. 2. The 40mm diameter requirement of TRAN-S1(5)(b) should be reduced for indigenous tree species.
Rooney Holdings Limited	174.25	TRAN - Transport	Standards	TRAN-S10 Vehicle access way requirements	Considers TRAN-S10(2) requires sealing 20 metres is unnecessarily long, and most roads are not sealed to the road boundary. Considers there are many examples where it is appropriate to access from the primary road without any adverse effect. Therefore, considers TRAN-S10(3) should promote rather than require access to the secondary roads. Considers the passing bay width of 5.5 metres in TRAN-S10(4) is excessive. Considers the 5.5m is intended to be the combined width of the carriage way and passing bay, but the drafting does not specify this.	Amend TRAN-S10 Vehicle access way requirements with the following changes: 1. Reduce the sealing requirement of TRAN-S10(2) from 20m to 5 metres from the existing seal formation regardless of the distance to the road boundary, and not require sealing where the road is unsealed. 2. Amend TRAN-S10(3) to promote the access to the secondary road as the principal consideration but provide for access to the primary road as an alternative where there are no resulting adverse effects. 3. Amend TRAN-S10(3) to specify a combined passing bay and carriage way width of 5.5 metres.
Rooney Holdings Limited	174.26	TRAN - Transport	Standards	TRAN-S17 Vehicle crossings onto roads with 70km/h or greater posted speed limits	The submitter is neutral on TRAN-S17.1 as the Plan does not appear to specify Gate Setback Distances referred to in the standard.	Amend TRAN-S17.1 to specify Gate Setback Distances.
Rooney Holdings Limited	174.27	TRAN - Transport	Standards	TRAN-S19 Lighting of parking and manoeuvring	Oppose TRAN-S19 referring to all zones. This standard conflicts with Light restrictions within Light Sensitive Areas as it is not	Amend TRAN-S19 Lighting of parking and manoeuvring with the following matters considered:
					clear what the standard means when it states "...that comply with the rules in the Light Chapter...".	1. Provide an exemption within Light Sensitive Areas, and all activities that are not commercial or industrial. 2. Many farms (Primary Production properties) will load and unload stock in darkness at certain times of the year and it is unnecessary to require lighting of these areas for when this activity occurs. 3. Many rural or rural lifestyle residential properties will have more than 10 or more (unmarked) parking spaces.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Rooney Holdings Limited	174.28	SASM - Sites and Areas of Significance to Māori	Rules	SASM-R1 Earthworks not including quarrying and mining	<p>Oppose SASM-R1(1) PER-1 as considers the maximum area of 750m² is too restrictive for earthworks associated with primary production and should be increased to 2000m².</p> <p>Oppose SASM-R1(1) PER-2. Considers the 2 weeks notice requirement is difficult for minor activities to be undertaken.</p> <p>Oppose earthworks within SASM-R1(3) being a restricted discretionary activity. Therefore seeks to remove SASM-R1(3) and amend permitted activity rule SASM-R1(1) to include wāhi tapu and wāhi tapu overlays.</p> <p>[Refer original submission for full reason]</p>	<p>Amend SASM-R1 as follows:</p> <p>SASM-R1 Earthworks not including quarrying and mining</p> <p>1 . Wāhi Tūpuna Overlay (excluding the Māori Purpose Zone), <u>Wāhi tapu and Wāhi tapu overlays</u></p> <p><i>Note : for earthworks associated with quarrying and mining, see SASM-R5</i></p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1</p> <p><i>The activity is either:</i></p> <p><i>1. earthworks, including those associated with and under new buildings/structures and those necessary for the installation of infrastructure / utilities, do not exceed a maximum area of 750m² <u>2000m²</u>; or</i></p> <p><i>2. earthworks for the purpose of maintaining existing roads , tracks , or natural hazard mitigation works, and are within the footprint or modified ground comprised by the existing road, track or natural hazard mitigation works; and</i></p> <p>PER-2</p> <p><i>The Accidental Discovery Protocol commitment form, contained within APP4 - Form confirming a commitment to adhering to an Accidental Discovery Protocol, has been completed and submitted to Council, at least 2 weeks prior to the commencement of any earthworks.</i></p> <p>2. Wāhi Taoka and Wai Taoka Overlay</p> <p>[...]</p> <p>3. Wāhi tapu and wai tapu overlays</p> <p>Activity status: Restricted Discretionary</p> <p>Where:</p> <p>RDIS-1</p> <p>All earthworks, including those associated with and under new buildings/structures, and including those necessary for the installation of infrastructure/utilities.</p> <p>Matters of discretion are restricted to:</p> <p>whether Te Rūnanga o Arowhenua has been consulted, the outcome of that consultation, and the extent to which the proposal responds to, or incorporates the outcomes of that consultation; and</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
						<p><i>whether a cultural impact assessment has been undertaken and the proposal's consistency with the values identified in SCHED6 – Schedule of Sites and Areas of Significance to Kāti Huirapa; and the potential adverse effects, including on sensitive tangible and/or intangible cultural values as identified through engagement with Te Rūnanga o Arowhenua; and</i></p> <p><i>effects on sites where there is the potential for koiwi or artefacts to be discovered, including consideration of the need to implement an accidental discovery protocol or have a cultural monitor present, and whether an accidental discovery protocol has been agreed with Te Rūnanga o Arowhenua; and</i></p> <p><i>whether there are alternative methods, locations or designs that would avoid or mitigate the impact of earthworks on the values associated with the site or area of significance; and the appropriateness of any mitigation measures proposed; and</i></p> <p><i>whether the proposed activity provides an opportunity to recognise Kāti Huirapa culture, history and identity associated with the site/area, and any potential to:</i></p> <p><i>affirm the connection between mana whenua and place; or</i></p> <p><i>enhance the cultural values of the site/area; or</i></p> <p><i>provide for the relationship of Kāti Huirapa with their taoka;</i></p> <p><i>commensurate with the scale and nature of the proposal; and</i></p> <p><i>any opportunities to maintain or enhance the ability of Kāti Huirapa to access and use the Site or Area of Significance; and</i></p> <p><i>where the earthworks will remove indigenous vegetation, the nature of any effects on mahika kai and other customary uses; and</i></p> <p><i>in respect of utilities, the extent to which the proposed utility has functional needs for its location.</i></p> <p>Note: <i>Limited notification of Te Rūnanga o Arowhenua is likely to be required under this rule.</i></p>
Rooney Holdings Limited	174.29	SASM - Sites and Areas of Significance to Māori	Rules	SASM-R5 Mining and quarrying	Oppose SASM-R5.1.PER-1 in relation to the inclusion of SASM-6 due to the upper Rangitata being back country land and the maximum area of 750m ² is too restrictive for mining and quarrying in this area.	Amend SASM-R5 Mining and quarrying by excluding SASM6 from the 750m ² earthwork limit for permitted activity under SASM-R5.1.PER-1.
Rooney Holdings Limited	174.30	ECO - Ecosystems and Indigenous Biodiversity	Policies	ECO-P1 Assessment and identification of significant indigenous biodiversity	Oppose ECO-P1 to the extent that Council has identified and mapped SNAs within the beds of rivers and lakes (section 13 RMA land). [Refer original submission for full reason]	Amend ECO-P1 Assessment and identification of significant indigenous biodiversity to specially exclude the identification of SNAs on section 13 RMA land.
Rooney Holdings Limited	174.31				Submission point deleted due to duplication, refer submission point 174.30.	Refer submission point 174.30.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Rooney Holdings Limited	174.32	ECO - Ecosystems and	Rules	ECO-R1 Clearance of indigenous vegetation (except as provided for in ECO-R2 for flood	The submitter supports the rule, but considers another provision should be added to provide for the clearance for indigenous vegetation within the SNA overlay where the	Amend ECO- R1 as follows: <i>ECO-R1 Clearance of indigenous vegetation (except as provided for in ECO-R2 for flood protection works or ECO- R3 for National Grid activities)</i>
		Indigenous Biodiversity		protection works or ECO-R3 for National Grid activities)	clearance is supported by QEII National Trust or the Department of Conservation.	1. Significant Natural Areas Overlay Activity status: Permitted Where [....] <u>PER-X</u> <u>Or the clearance is supported by the QEII National Trust or the Department of Conservation.</u>
Rooney Holdings Limited	174.33	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R4 Clearance of trees in the Long-Tailed Bat Protection Area	Oppose ECO-R4. The rules means that minor clearance of some trees would not be a permitted activity. Considers landowners should be encouraged to work with the Department of Conservation to protect existing bat habitat without the need for the additional regulatory requirement of needing a resource consent. [Refer original submission for full reason	Amend ECO-R4 Clearance of trees in the Long-Tailed Bat Protection Area to provide for any vegetation clearance to be a permitted activity where consultation with the Department of Conservation has been undertaken in advance of the clearance.
Rooney Holdings Limited	174.34	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R5 Earthworks in a Significant Natural Area	Opposes ECO-R5. Considers a permitted activity rule should be inserted at ECO-R5 to provide for earthworks within the SNA overlay where the earthworks is supported by QEII National Trust or the Department of Conservation. This would support the submitter's submission in relation to ECO- R1(1) regarding indigenous vegetation clearance.	Amend ECO-R5 Earthworks to create a permitted activity rule for earthworks within a Significant Natural Area where the earthworks are supported by the QEII National Trust or the Department of Conservation. Any consequential amendments as a result of the change.
Rooney Holdings Limited	174.35	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R6 Subdivision of land containing a Significant Natural Area	Oppose ECO-R6 as subdivision of land containing a SNA should not be a discretionary activity simply because the site has a SNA within it. The SNA is unlikely to be affected by the subdivision unless the boundary change dissects the SNA.	Amend the heading of ECO-R6 as follows: <i>ECO-R6 Subdivision of land containing a Significant Natural Area <u>where a new boundary intersects a Significant Natural Area.</u></i> AND Insert a new policy to support the requested change to this rule.
Rooney Holdings Limited	174.36	SCHED 10 Schedule of Visual Amenity Landscapes	Visual Amenity Landscape overlay	VAL-4 Cave Hill	Opposes NFL-R7 requiring a resource consent for afforestation within VAL-4. This VAL layer covers a significant area of land that is already subject to multiple SNAs.	Either: Delete VAL-4 ; OR Delete NFL-R7 Afforestation .

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Rooney Holdings Limited	174.37	NFL Natural Features and Landscapes	- Rules	NFL-R7 Afforestation	Opposes NFL-R7 requiring a resource consent for afforestation within VAL-4. This VAL layer covers a significant area of land that is already subject to multiple SNAs.	Either Delete NFL-R7 Afforestation ; OR Delete VAL-4 .
Rooney Holdings Limited	174.38	NFL Natural Features and Landscapes	- Rules	NFL-R8 New roads, farm tracks and walking and cycling tracks	Oppose NFL-R8 applying to the VAL overlay. Including the VAL overlay is unduly restrictive and unnecessary.	Amend NFL- R8 as follows: NFL- R8 New roads, farm tracks and walking and cycling tracks ONF overlay ONL overlay VAL overlay Activity status: Restricted Discretionary [...]
Rooney Holdings Limited	174.39	NFL Natural Features and Landscapes	- Rules	NFL-R9 Subdivision	Oppose all subdivision being discretionary within an ONF, ONL or VAL overlay. Considered the Discretionary activity status are unnecessarily restrictive: 1. For any subdivisions within VAL; and 2. For boundary adjustment subdivision and subdivisions for primary production on ONF and ONL. And consider the above activities should not be controlled under this rule	Amend NFL-R9 Subdivision to: 1. remove the VAL Overlay; and 2. exclude boundary adjustment subdivisions; and 3. exclude subdivision of land used for primary production.
Rooney Holdings Limited	174.40	NFL Natural Features and Landscapes	- Standards	NFL-S3 Proximity of new residential units, farm buildings and structures to existing buildings	Oppose NFL-S3.2 as this level of control is unnecessary for a visual amenity landscape.	Amend NFL-S3 Proximity of new residential units, farm buildings and structures to existing buildings to delete the control within VAL overlay (NFL-S3.2) from the standard.
Rooney Holdings Limited	174.41	NFL Natural Features and Landscapes	- Standards	NFL-S4 Footprint of buildings and structures and lengths of irrigators	Oppose NFL-S4.2 as this level of control in unnecessary for a visual amenity landscape.	Amend NFL-S4 Footprint of buildings and structures and length of irrigators to delete the control within VAL overlay (NFL-S4.2) from the standard.
Rooney Holdings Limited	174.42	NFL Natural Features and Landscapes	- Standards	NFL-S5 Colours and materials	Oppose NFL-S5.2 as this level of control in unnecessary for a visual amenity landscape.	Amend NFL-S5 Colours and materials to delete the control within VAL overlay (NFL-S5.2) from the standard.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Rooney Holdings Limited	174.43	NFL - Natural Features and Landscapes	Standards	NFL-S6 Earthworks	Oppose NFL-S6.2 as this level of control is unnecessary for a visual amenity landscape.	Amend NFL-S6 Earthworks to delete the control within VAL overlay (NFL-6.2) from the standard:
Rooney Holdings Limited	174.44	PA - Public Access	Policies	PA-P1 Benefits of public access	Oppose PA-P1 as the policy needs to recognise the negative impact public access can have on landowners, in particular those involved in primary production. The current drafting only looks at public access through one sphere.	Amend PA-P1 Benefits of public access to recognise the impacts of public access also.
Rooney Holdings Limited	174.45	PA - Public Access	Policies	PA-P2 Requirements for public access	Opposes PA-P2 that states "Require" public access. The policy should be worded to "facilitate" public access. This needs to be able to be balanced as public access may not be appropriate in all circumstances depending on the type of land use.	Amend PA-P2 Requirements for public access by: 1. replacing the word 'Require' with either 'facilitate' or 'promote'. 2. Insert an additional subclause recognising reverse sensitivity effects.
Rooney Holdings Limited	174.46	PA - Public Access	Policies	PA-P4 Limiting public access	Considers PA-P4 should recognise reverse sensitivity as a reason for limiting public access.	Amend PA-P4 Limiting public access to include a subclause identifying reverse sensitivity as a reason to limit public access.
Rooney Holdings Limited	174.47	SUB - Subdivision	Policies	SUB-P2 Subdivision of land within sensitive environments	Opposes the directive to requiring esplanade provisions as described in SUB-P2.2. Considers the esplanade provisions may compromise the ability of the landowner to continue to use their land effectively due to reverse sensitivity. [Refer original submission for full reason]	Amend SUB-P2 to recognise that esplanade provisions can have an adverse effect through reverse sensitivity; AND Related relief sought to other submission points on SUB Chapter policies.
Rooney Holdings Limited	174.48	SUB - Subdivision	Policies	SUB-P7 Esplanade reserves and strips	Opposes the directive to requiring esplanade provisions as described in SUB-P2.2. Considers the esplanade provisions may compromise the ability of the landowner to continue to use their land effectively due to reverse sensitivity. [Refer original submission for full reason]	Amend SUB-P7 Esplanade reserves and strips to remove the requirement for esplanade provisions; AND Related relief sought to other submission points on SUB Chapter policies.
Rooney Holdings Limited	174.49	SUB - Subdivision	Policies	New	Opposes the directive to requiring esplanade provisions as described in SUB-P2.2. Considers the esplanade provisions may compromise the ability of the landowner to continue to use their land effectively due to reverse sensitivity. The submitter refers to the draft Waitaki District Plan which provides for a waiver/reduction. [Refer original submission for full reason]	And a new policy to the SUB-Subdivision Chapter to provide for a waiver or a reduction for esplanade requirements; AND Related sought to other submission points on SUB Chapter policies.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Rooney Holdings Limited	174.50	SUB - Subdivision	Policies	SUB-P11 Residential Intensification	Supports SUB-P11 but consider that SUB-P11.2 should also afford the same flexibility to the General Residential Zone.	Amend SUB-P11 as follows: SUB-P11 Residential Intensification Provide for consolidation of residential zones outside of the Gleniti Low Density Residential Specific Control Areas and PREC1 - Old North General Residential Precinct by: 1. enabling a variety of residential units within the constraints of the allotment size anticipated by the zone; 2. not specifying a minimum allotment size in the General Residential Zone and the Medium Density Zone for joint subdivision and land use applications to ensure flexibility and comprehensive consideration of applications; and [...]
Rooney Holdings Limited	174.51	SUB - Subdivision	Policies	SUB-P14 Rural allotments	Opposes the use of the word “avoid” in SUB-P14. Considers the policy should provide flexibility to work with natural boundaries and existing fence lines and occupation.	Amend SUB-P14 as follows: SUB-P14 Rural allotments Avoid-Disourage subdivision that creates allotments that are less than the required minimum allotment size within the General Rural Zone and Rural Lifestyle Zone unless: 1. the subdivided allotments are solely for the purpose of network utilities, esplanade reserves or strips, roads, walkways, cycleways or access; or 2. the non-compliance is minor and the subdivision maintains the dwelling density anticipated for the zone; and 3. the subdivision is necessary for natural hazard mitigation; or 4. the subdivision is necessary to protect the values of sensitive environments. AND
						Amend the policy to encourage, where practicable, for new boundaries to align with natural boundaries or existing fence lines.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Rooney Holdings Limited	174.52	SUB - Subdivision	Rules	SUB-R1 Boundary adjustment	Opposes SUB-R1. Consider that Boundary adjustments should be a permitted activity. [Refer original submission for full reason]	Amend SUB-R1 Boundary adjustment as follows: SUB-R1 Boundary adjustment Activity status : Controlled Permitted CON-1 SUB- S1 is complied with; and CON-2 SUB-S2 to SUB- S7 are complied with. Matters of control are restricted to: [...]
Rooney Holdings Limited	174.53	SUB - Subdivision	Standards	SUB-S1 allotment sizes and dimensions	The submitter has a neutral position on proposed allotment sizes within all zones as the overarching effects of the proposed sizes is still being assessed.	Not specified.
Rooney Holdings Limited	174.54	SUB - Subdivision	Standards	SUB-S1 Allotment sizes and dimensions	Considers SUB-S1.6 should be amended to allow for legal access to road frontage.	Amend SUB-S1 as follows: SUB-S1 Allotment sizes and dimensions SUB-S1 6. General Industrial Zone Allotments must have <u>legal access to</u> a minimum road frontage width of 7m. [...]

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Rooney Holdings Limited	174.55	SUB - Subdivision	Standards	SUB-S3 Water supply	Opposes SUB-S3.1 using a consent notice to “alert” future owners that the allotment does not require a water supply. [Refer original submission for full reason]	Amend SUB-S3 follows: SUB-S3 Water supply 1. General Rural Zone 1. All allotments within a rural water supply scheme must have either: a. Approval for the allotment to connect to a rural water supply scheme.... b.[...] c. Evidence the future use of the allotment does not require water supply, and a consent notice is proposed altering future purchasers. [...]
Rooney Holdings Limited	174.56	SUB - Subdivision	Standards	SUB-S4 Wastewater disposal	Opposes the requirement for all General Industrial Zone allotments to be connected to a reticulated wastewater network when there is currently limited ability to provide a reticulated connection in this zone due to location and Council infrastructure capacity. The standard should provide a minimum distance to the allotment boundary before a connection is required.	Amend SUB-S4 Wastewater disposal to only require a connection within the General Industrial Zone where a conveyance structure of the reticulated sewer network passes within 50 metres of the allotment boundary and where Council can provide that service.
Rooney Holdings Limited	174.57	SUB - Subdivision	Standards	SUB-S6 Vehicular access	Opposes SUB-S6.2. The standard should refer to no “additional” access with regard to a state highway or railway line. The standard should not alter the activity status of an application where there is an existing lawful access to either a state highway or crossing a railway line.	Amend SUB-S6 Vehicular Access so that clause 2 does not apply to existing vehicular crossings, and instead only new or additional crossings.
Rooney Holdings Limited	174.58	SUB - Subdivision	Standards	SUB-S8 Esplanade reserves and strips	Opposes SUB-S8. This standard should not apply to boundary adjustments . The standard should also recognise that in accordance with section 230 RMA esplanade provisions are only required where the average bed width of a river through or adjoining an allotment is 3m or more. The standard should outline that Council should be paying compensation for all esplanade provisions. [Refer original submission for full reason]	Amend SUB-S8 Esplanade reserves and strips to recognise Section 230 of the Resource Management Act; to provide for a minimum width of 5 metres regardless of lot size; and that compensation is to be paid where any strip is taken.
Rooney Holdings Limited	174.59	EW - Earthworks	Rules	EW-R1 Earthworks, excluding earthworks [...]	Opposes the methodology of achieving accidental discovery protocol by requiring a “commitment” form to be completed in accordance with APP4. The submitters do not oppose the principle of Accidental Discovery Protocol. But considers two weeks’ notice is too onerous and will make it very difficult for minor activities to be undertaken as a permitted activity as intended.	Request to amend EW-R1 Earthworks by removing the requirement to provide two weeks notice in PER-2

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Rooney Holdings Limited	174.60	EW - Earthworks	Standards	EW-S1 Areas	Opposes EW-S1.2 applying to earthworks necessary to complete a subdivision in the General Residential Zone and the Medium Density Residential Zone. Such control has not been exerted under the operative District Plan.	Amend EW-S1 Areas to exclude earthworks associated with implementing a subdivision consent prior to receiving section 224(c) RMA Certification, in the General Residential Zone and Medium Density Residential Zone.
Rooney Holdings Limited	174.61	DWP - Drinking Water Protection	Rules	DWP-R2 Subdivision not connected to a community sewage system	Opposes DWP-R2 applying to all subdivision. It is submitted that DWP-R2 should not apply to boundary adjustment subdivision or subdivision not intended for use where a wastewater disposal is required.	Amend DWP-R2 Subdivision not connected to a community sewage system to exclude boundary adjustment subdivision or subdivision where the resultant use does not require wastewater disposal.
Rooney Holdings Limited	174.62	FC - Financial Contribution	Policies	FC-P2 Financial contributions for infrastructure and facilities	Opposes FC-P2. The policy is not specific enough in relation to meeting the needs for additional infrastructure that arise from the activity.	Amend FC-P2 Financial contributions for infrastructure and facilities to provide clarity.
Rooney Holdings Limited	174.63	APP7 - Financial Contribution	1.0 Water, Stormwater, Wastewater and Rooding	General	Oppose the drafting of APP7, 1.0 in its current form. It is submitted that the drafting of APP7 should specify more detail especially in relation to financial contributions for retrospective infrastructure upgrades. These should only include the cost of the over and above from what would have been routine upgrade and replacement work. [see original submission for full detail]	Redraft APP7 - Financial Contribution 1.0 Water, Stormwater, Wastewater and Rooding .
Rooney Holdings Limited	174.64	APP7 - Financial Contribution	1.0 Water, Stormwater, Wastewater and Rooding	1.4 Water, Stormwater, Wastewater and Rooding	Opposes 1.4.a specifying the "full actual cost". It is submitted that an equitable share would be a more appropriate term especially as financial contributions for infrastructure are predominately taken retrospectively. [see original submission for full reason]	Amend APP7 - Financial Contribution , 1.0 Water, Stormwater, Wastewater and Rooding to make it clear that any infrastructure contribution will be an equitable share of the full cost of any upgrade required as a result of the development.
Rooney Holdings Limited	174.65	APP7 - Financial Contribution	2.0 Open Space Recreation		Oppose a 4% contribution due to it being a significant increase from \$500 which is payable under the operative District Plan.	Amend APP7 - Financial Contribution 2.0 Open Space Recreation to retain the Operative District Plan approach of a flat fee contribution that is affordable and facilitates subdivision and development.
Rooney Holdings Limited	174.66	Planning Maps	Future Development Area Overlay	New	The submitters are neutral on the proposed Future Development Areas and submits that Lot 4 DP 301476 and Pt Lot 2 DP 17808 behind EcoTech Ltd in Redruth should be identified as an additional Future Development Area for either a partial extension of the General Industrial Zone and/or General Residential Zone.	Add to the Planning Maps an additional Future Development Area for General Industrial Zone and/or General Residential Zone purposes over Lot 4 DP 301476 and Pt Lot 2 DP 17808 (Redruth).
Rooney Holdings Limited	174.67	SCHED15 - Schedule of Future Development Areas	SCHED15 - Future Development Area	New	Submits that Lot 4 DP 301476 and Pt Lot 2 DP 17808 behind EcoTech Ltd in Redruth should be identified as an additional Future Development Area for either a partial extension of the General Industrial Zone and/or General Residential Zone.	Add to SCHED15 Schedule of Future Development Areas an additional Future Development Area for General Industrial Zone and/or General Residential Zone purposes over Lot 4 DP 301476 and Pt Lot 2 DP 17808 (Redruth).

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Rooney Holdings Limited	174.68	LIGHT - Light	General	General	Opposes the Light provisions as proposed. Considers the provisions are too extensive and restrictive and will make compliance as a permitted activity difficult. Proposed Plan Change 22 to the Mackenzie District Plan provides a more pragmatic framework.	Delete the proposed LIGHT- Light provisions and replace these provisions with those contained in Proposed Plan Change 22 of the Mackenzie District Plan.
Rooney Holdings Limited	174.69	LIGHT - Light	Rules	LIGHT-R1 Artificial outdoor lighting outside light sensitive areas	Opposes PER-3 of LIGHT-R1.1.Considers the performance standard is essentially extending the Light Sensitive Area. If a site is outside of the Light Sensitive Area, then only PER-1 and PER-2 should apply.	Amend LIGHT-R1 as follows: LIGHT-R1 Artificial outdoor lighting outside light sensitive areas Activity status: Permitted PER-1 [...] PER-3 <i>If the outdoor artificial light is located adjoining a Light Sensitive Area, it must:</i> <i>1.be fully shielded (see Figure 18—Lighting Fixtures); and</i> <i>2.have a colour corrected temperature of no greater than 3000K (warm white); and</i> <i>3.be installed in a manner that precludes operation between 10pm and 7am the following day; and</i> <i>4.meet the illumination levels set out in Table 22, when measured at boundary of the Light Sensitive Area.</i>
Rooney Holdings Limited	174.70	LIGHT - Light	Rules	LIGHT-R2 Outdoor artificial lighting for health and safety	Considers LIGHT-R2 should be extended to provide for permitted activities, not just a temporary activity. Temporary activities are limited as defined.	Amend LIGHT-R2 PER-2 to provide for any temporary activity.
Rooney Holdings Limited	174.71	LIGHT - Light	Rules	LIGHT-R3 Outdoor artificial lighting within Light Sensitive Areas not listed in light-R2	Opposes LIGHT-R3. PER-2(3) and considers it too restrictive and not practicable for many activities including primary production activities. Considers the rule should also provide for sensor lighting to be an option.	Amend LIGHT-R3 to: - provide for lighting in relation to primary production activities; and - to also provide for sensor lighting as a performance standard; and - reduce the time restriction period to recognise that many activities that require artificial light commence before 7am.
Rooney Holdings Limited	174.72	NOISE - Noise	Rules	NOISE-R9 Any new building for use by a noise sensitive activity and alterations to existing buildings for use by a noise sensitive activity (not listed in NOISE-R12)	Oppose NOISE-R9 to the extent that it applies to alterations to existing buildings. Considers the rule should only apply to new buildings. [Refer original submission for full reason]	Amend NOISE-R9 so it does not apply to alterations to existing buildings.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Rooney Holdings Limited	174.73	RELO - Relocated Buildings and Shipping Containers	Policies	RELO-P1 Relocated buildings and shipping containers in General Industrial Zone	Considers RELO-P1 should also enable the use of shipping containers in the General Rural Zone as these are currently widely used within the zone.	Amend RELO-P1 as follows: RELO-P1 Relocated buildings and shipping containers in General Industrial Zone and <u>General Rural Zone</u>. Enable the relocation of buildings and shipping containers in the <u>General Rural Zone</u> , General Industrial zone and Port Zone.
Rooney Holdings Limited	174.74	RELO - Relocated Buildings and Shipping Containers	Policies	RELO-P2 Shipping containers in all other zones	Considers RELO-P2 should be more flexible to provide for shipping containers to be screened and not readily visible but not necessarily unseen.	Amend RELO-P2 as follows: RELO-P2 Shipping containers in all other zones Enable shipping containers where: 1.they are screened so that they are not <u>readily</u> visible from any road; or [...]
Rooney Holdings Limited	174.75	RELO - Relocated Buildings and Shipping Containers	Rules	RELO-R2 Placement of a shipping container	Opposes RELO-R2(2). This should be a permitted activity rule.	Amend RELO-R2 as follows: RELO-R2 Placement of a shipping container - 2. All zones except the General industrial Zone and the Port Zone Activity Status : Controlled Permitted Where: CON-1 The shipping container is either: 1 .located more than 20m from a road boundary; or 2. is not visible from the road; and CON-2 [...]
Rooney Holdings Limited	174.76	TEMP - Temporary activities	Rules	TEMP-R3 Temporary events	Opposes TEMP-R3. Considers the number of events should be extended and should also provide for motorsport events. Also considers the rule should apply to all zones and should allow for regular temporary events such as markets that add to the vibrancy of the community and should not require resource consent to the limitations of the rule. [Refer original submission for full reason]	Amend TEMP-R3 Temporary events to apply to all zones and allow for regular temporary events such as markets that add to the vibrance of the community. Extend the number of events for non-motorsport and also provide for a limited number of motorsport events.


Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Rooney Holdings Limited	174.77	GRZ - General Residential Zone	Rules	GRZ-R10 Fences	Opposes PER-1 limiting the height of a road boundary fence or a fence adjoining a walkway or cycleway to 1m or 45% visually permeable. This is considered to result in a loss of privacy and make screening of outdoor storage difficult for landowners. Considers restrictions should be left to developers to impose through covenants if considered necessary, and not apply to the entire zone.	Amend GRZ-R10 as follows: GRZ-R10 Fences Activity status: Permitted Where: PER-1 <i>Any fence within 2m of a sites road boundary or a boundary shared with a public reserve, walkway or cycleway is:</i> <i>no higher than 1m above ground level; or</i> <i>no higher than 1.8m above ground level where at least 45% of the fence is visually permeable; and</i> PER-2 [...]
Rooney Holdings Limited	174.78	GRZ - General Residential Zone	Standards	GRZ-S9 Landscaping	Opposes GRZ-S9 as this level of control is not required by the District Plan. Also requests that plan clarify if grassed landed areas also comply/qualify as outdoor living space.	Delete GRZ-S9 Landscaping .
Rooney Holdings Limited	174.79	MRZ - Medium Density Residential Zone	Policies	MRZ-P3 innovative approaches	Supports MRZ-P3.	Retain as notified.
Rooney Holdings Limited	174.80	MRZ - Medium Density Residential Zone	Rules	MRZ-R10 Fences	The submitter opposes PER-1 limiting the height of a road boundary fence or a fence adjoining a walkway or cycleway to 1m or 45% visually permeable as it is considered it will result in a loss of privacy and provide screening of outdoor storage difficult for landowners. It is submitted that such restrictions should be left to developers to impose through covenants if considered necessary, and not apply to the entire zone.	Amend MRZ-R10 Fences . MRZ-R10 Fences Activity status: Permitted Where: PER-1 <i>Any fence within 2m of a sites road boundary or a boundary shared with a public reserve, walkway or cycleway is:</i> <i>1. no higher than 1m above ground level; or</i> <i>2. no higher than 1.8m above ground level where at least 45% of the fence is visually permeable;</i> <i>and</i> PER-2 [...]

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Rooney Holdings Limited	174.81	MRZ - Medium Density Residential Zone	Rules	MRZ-S6 Landscaping	The submitters oppose MRZ-S6. The level of control is not required by the District Plan. Most owners of residential sections provide landscaping on their own accord.	Delete MRZ-R6 Landscaping .
Rooney Holdings Limited	174.82	MRZ - Medium Density Residential Zone	Standards	MRZ-S10 Noise mitigation measures	Opposes MRZ-S10 as this standard is contrary to the conditions of Subdivision Consent 101.2021.79.1 granted to Timaru Developments Ltd on 14.4.22. The subdivision consent only requires a 2-metre-high acoustic fence, not 4 metres. MRZ-S10.2 and 3 are addressed in the subdivision consent conditions and by the consent itself.	Delete MRZ-S10 Noise mitigation measures .
Rooney Holdings Limited	174.83	GRUZ - General Rural Zone	Rules	GRUZ-R4 Residential units, excluding seasonal workers accommodation and permanent workers accommodation	Oppose GRUZ-R4 PER-1. Considers that a minimum site area of 40ha is unnecessary and overly restrictive. The minimum site area should be 10ha and should also provide for clustering of residential units on a site comparable to the overall property size where a farm comprises multiple records of title . Changes to PER-1 to reflect this would provide more flexibility to farm owners and avoid unnecessary and costly resource consents.	Amend GRUZ-R4 Residential units, ... to provide for the following: -a reduced minimum site area of 10ha; -the clustering of residential units on a site regardless of the site size up to a 1 residential unit per 10ha of overall property (combined sites) area.
Rooney Holdings Limited	174.84	GRUZ - General Rural Zone	Rules	GRUZ-R11 Recreation activities	Oppose GRUZ-R11 PER-1. It is considered that the rule should provide for commercial activities that are non-motorised, or predominately non- motorised as a permitted activity.	Amend GRUZ-R11 Recreation activities to provide or commercial activities that are predominantly non-motorised.
Rooney Holdings Limited	174.85	GRUZ - General Rural Zone	Rules	GRUZ-R14 Use of airstrips and helicopter landing sites	Supports the provisions of the rule for primary production but considers that the rule should also provide for take- off and landings associated with recreational activities such as hunting and fishing whether commercial or non-commercial. Such activities are often associated with properties undertaking primary production and provide an integrated part of the income stream for that property.	Amend GRUZ-R14 Use of airstrips and helicopter landing sites to provide for take-off and landings associated with commercial and non-commercial recreational activities.
Rooney Holdings Limited	174.86	GRUZ - General Rural Zone	Rules	GRUZ-R16 Quarries and quarrying activities [...]	Opposes GRUZ-16 PER-4 requiring Accidental Discovery Protocol. Considers the SASM areas in the proposed plan are extensive and the Accidental Discovery Protocol commitment should only be required in SASM areas. Council should be promoting the practice of accidental discovery rather than regulating for it through a rule. [see original submission for full reason]	Amend GRUZ-R16 as follows: <i>GRUZ-R16 Quarries and quarrying activities: up to 2,000m² (not in the bed of a river); and in the bed of a river , which is authorised under the Regional Plan either as a permitted activity, or through a resource consent having been obtained from the Canterbury Regional Council</i> <i>Activity status: Permitted</i> [....]
						<i>PER-4</i> <i>Where located in a SASM, the Accidental Discovery Protocol commitment form, contained within APP4 - Form confirming a commitment to adhering to an Accidental Discovery Protocol, has been completed and submitted to Council, at least 2 weeks prior to the commencement of any earthworks.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Rooney Holdings Limited	174.87	GRUZ - General Rural Zone	Rules	GRUZ-R20 Permanent workers accommodation	Opposes GRUZ-20. It is considered the minimum requirement of 80 hectares is too large and not necessary . A restriction tied to an overall property size of 40 hectares would be more appropriate and should provide for clustering of residential units as appropriate to the size and scale of the property. Considers that as long as the minimum site/property threshold is met there should be no further restrictions. Limiting the scope of the use of those residential units is not a sustainable use of existing resources. [see original submission for full reason]	Amend GRUZ-R20 as follows: GRUZ-R20 Permanent workers accommodation Activity status: Permitted Where: PER-1 <i>It is located on a site larger than 40 80 hectares ; or that where a property comprises more than one record of title, the sum of the titles is greater than 40 hectares. The overall density shall not be greater than 1 unit per 40 hectares that comprises the property .; and</i> PER-2 <i>An employment contract for the permanent full-time worker(s) who will reside in the worker's accommodation is provided to Timaru District Council at the time of a building consent application and is available upon request; and</i> PER-3 <i>It is located on the same site where the permanent full worker is employed.</i> <i>Note: any associated building and structure must be constructed in accordance with GRUZ-R13.</i>
Rooney Holdings Limited	174.88	GRUZ - General Rural Zone	Standards	GRUZ-S4 Setbacks for Sensitive Activities	The submitter believes the standard should exclude rural water tanks as these are a building by definition and are predominately located on boundaries adjoining fence lines.	Amend GRUZ-S4 to exclude water tanks.
Rooney Holdings Limited	174.89	GIZ - General Industrial Zone	Rules	GIZ-R2 Industrial ancillary activities	Opposes GIZ-R2 as it does not provide for residential activities that are ancillary to an industrial site. Considers the rule should provide for residential units and residential activities that are ancillary to the primary industrial activity. The rule should also apply to separate adjoining sites that are in the same ownership of that as the principal site.	Amend GIZ-R2 as follows: GIZ-R2 Industrial ancillary activities Activity status: Permitted Where: PER-1 <i>The activity and its associated buildings and structures (excluding fences) are located more than 50 metres from any Residential Zone unless the ancillary activity is a residential activity on the site, or on an adjoining site in the same ownership as that of the primary industrial activity site ; and</i> PER-2 <i>The activity does not include a residential activity; and</i> PER-3 <i>Any ancillary activity(s):</i> <i>1. are located on the same site of the primary industrial activity or on an adjoining site in the same ownership as that of the primary industrial activity site; and</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
						<p>2.has a maximum combined gross floor area of 15% of the primary industrial buildings on the site; and</p> <p>PER-4</p> <p>The activity and its associated buildings and structures, complies with all the Standards of this chapter.</p>
Rooney Holdings Limited	174.90	DEV1 - Broughs Gully Residential Development Area	General	General	The submitters have a neutral position on DEV-1.	None specified.
Rooney Holdings Limited	174.91	DEV2 - Gleniti Residential Development Area	Rules	DEV2-R1 Land use, subdivision and development	The submitters oppose DEV2-R1 as the rule should not apply to land use and development. It is unclear to the submitter, what difference is intended between land use and development. The standards of DEV should only apply to subdivision (apart from DEV2-S1.3) as all five standards relate to infrastructure that will vest to Council through subdivision. It is considered unnecessarily onerous and unfair for an owner to trigger the performance standards when constructing a new residential dwelling outside of subdivision.	<p>Amend the Rules and Standards of the chapter to achieve the follows:</p> <ul style="list-style-type: none"> -amend DEV2-R1,PER-2 to include a new residential unit; -standards DEV2-S1 to DEV2-S5 should not apply to land use activities apart from DEV2-S1.3; -define the relationship between land use and development OR delete the term 'development'.
Rooney Holdings Limited	174.92	DEV2 - Gleniti Residential Development Area	Standards	DEV2-S3 Walkway/cycleways	The submitters oppose this standard as it triggers a developer to design and construct ALL cycleways/walkways indicated on the Gleniti Residential Development Area Plan. The submitter considers this absurd and not practically possible as the developer will not own all the sites within DEV2.	<p>Amend DEV2-S3 to achieve the following:</p> <ul style="list-style-type: none"> -to only provide for the land required and delete requirements for the developer to design and form the walkways/cycleways; -to provide for walkway/cycleway land to be provided as land in lieu of cash to offset any reserve contribution payable; -to only apply to subdivision.
Rooney Holdings Limited	174.93	DEV3 - Washdyke Industrial Development Area	Rules	DEV3-R1 Land use, subdivision and development	Considers the rule should not apply to land use and development. The standards should only apply to subdivision (apart from DEV3-S1(3)) as all five standards relate to infrastructure that will vest to council through subdivision. Amendment also sought to clarify how infrastructure will vest to Council outside of subdivision.	<p>Amend the Rules and Standards of the chapter to achieve the following:</p> <ol style="list-style-type: none"> 1. Amend DEV3-R1.PER-2 to include a new residential unit; 2. standards DEV3- S1 - S5 should not apply to land use activities apart from DEV3-S1.3; 3. define the relationship between land use and development OR delete the term 'development'.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Rooney Holdings Limited	174.94	DEV3 - Washdyke Industrial Development Area	Standards	DEV3-S1 Roading	<p>Opposes DEV3-S1 but do not oppose the location of ROAD 5. The submitter considers that there is no benefit to the landowner from ROAD 5 as the road is facilitating Council's vision for development of the road network. Council should be solely responsible for the design and construction of ROAD 5 and compensation should be paid to the landowner for the land taken (if ROAD 5 becomes a Principal Road).</p> <p>It is noted that ROAD 5 is not listed in SCHED1 - Schedule of Roading Hierarchy, however as ROAD 5 is taking on the function of the Seadown Road to Meadows Road connection it is anticipated ROAD 5 will become a Principal Road and Seadown Road between ROAD 5 and Meadows Road will revert to a Local Road.</p>	<p>Amend DEV3-S1 Roading with the following changes:</p> <ol style="list-style-type: none"> 1. to only provide for the land to vest with Council at the time of subdivision; 2. to provide for compensation to be paid to the landowner for the land surrendered for ROAD 5; 3. delete the requirements for the developer to design and construct ROAD 5: <p>[...]</p>
Rooney Holdings Limited	174.95	SCHED1 - Schedule of Roading Hierarchy	Local Roads	All other roads are local roads.	Oppose DEV3-S1 but do not oppose the location of ROAD 5.	Amend SCHED1 - Schedule of Roading Hierarchy to include ROAD 5 or note on DEV3 - Washdyke Industrial Development Plan that ROAD 5 is a Local Road.
Rooney Holdings Limited	174.96	DEV3 - Washdyke Industrial Development Area	Standards	DEV3-S2 Stormwater, water and sewerage infrastructure	Opposes DEV3-S2. It is submitted that the standard is unclear using the term "required". Considers the standard should simply refer to where there is existing reticulated infrastructure within a minimum distance from the site boundary, and that infrastructure can be extended to the boundary.	Amend DEV3-S2 Stormwater, water and sewerage infrastructure to require reticulated water and services to be provided to the boundary when the network is within a specified distance of the site and can be extended to the boundary.
Rooney Holdings Limited	174.97	DEV3 - Washdyke Industrial Development Area	Standards	DEV3-S3 Walkway/cycleways	<p>Opposes the standard which triggers a developer to design and construct ALL walkways/cycleways indicated on DEV3 - Washdyke Industrial Development Area Plan. Also considers an amendment to provide clarity on whether the intention is for the walkway/cycleways to be on legal road or be from land taken from the developer adjacent to the legal road. Considers any walkway/cycleways within DEV3 should be designed and constructed by Council and should be funded from Council's Reserves Contribution Fund. If land for walkway/cycleways is to be taken upon subdivision, then compensation should be paid to the landowner.</p> <p>[see original submission for full reason]</p>	Delete DEV3-S3 .
Rooney Holdings Limited	174.98	APP4 Form confirming a commitment to adhering to an Accidental Discovery Protocol	General	General	Oppose APP4 and the need to confirm a commitment to adhering to an Accidental Discovery Protocol. The submitters support the principle of accidental discovery protocol, the specified requirement is a pseudo contract that is unnecessary. The submitter supports working with the relevant authorities and local Rūnanga when accidental discovery occurs.	Delete the requirement to 'commit' to the Accidental Discovery Protocol as outlined in various chapters of the PDP.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
PrimePort Limited	175.4	Planning Maps	Esplanade Provisions Overlay		The area of land north of Talbot Street within the Port Zone, being land contained within Lot 2 DP 326718, forms part of the working Port area and may on occasion require closure for health and safety reasons, or may be developed for Port purposes. Provision for an esplanade reserve is inconsistent with those uses, nor is an esplanade reserve required in that location given public access can be gained to the coast from Talbot Street, the adjoining Open Space Zone and along the coast itself.	Amend the Planning Maps to delete the Esplanade Provision overlay on Lot 2 DP 326718.
PrimePort Limited	175.5	Planning Maps	Public Access Provision overlay		Oppose the Public Access Provisions north of Talbot Street, within Lot 2 DP 326718. This land forms part of the Port Operational Area that periodically requires closure for health and safety reasons. Public access can be gained to the coast from Talbot Street, the adjoining Open Space Zone and along the coast itself.	Amend the Planning Maps to delete the Public Access Provision overlay within Lot 2 DP 326718.
PrimePort Limited	175.6	Planning Maps	Public Access Provision overlay		Public access to the coastal marine area within the operational areas of the Port must not be required, for public health and safety, and security reasons. The PDP does not require public access provision in those areas and this is supported.	Retain that there is no public access provision requirement within the Operational Port area.
PrimePort Limited	175.7	Planning Maps	Urban Area boundary		<p>The Urban Area encompasses the large majority of the Port Zone, which is supported as the Port Zone is developed and utilised for urban purposes. There is however a sliver of land in the north eastern section of the Port Zone that is zoned "Port Zone" but lies outside the Urban Area boundaries. That area should also be zoned Urban Area. The area of land in question is annotated on the image in blue below.</p> 	Retain the Urban Area boundary and amend to fully encompass the Port Zone.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
PrimePort Limited	175.8	Planning Maps	Noise Control Boundary Overlay		Considers the proposed Port Inner Noise Control Boundary and the Port Outer Noise control Boundary are consistent with that previously recommended by Acoustic Engineering Services, per their report of February 2022.	Retain the Port Inner Noise Control Boundary and the Port Outer Noise Control Boundary as notified on the Planning Maps.
PrimePort Limited	175.9	Planning Maps	Precinct	PREC7 - Port Operational Area Precinct	Considers the Precinct 7 boundaries are consistent with the core Port operational area.	Retain PREC7 as notified on the Planning Maps.
PrimePort Limited	175.10	Planning Maps	Height Specific Control Area	General	A Height Specific Control Area covers a large part of the Port Zone. This is inconsistent with Schedule 16B which states that the Height Specific Control Area is located in the General Industrial Zone only, and is inconsistent with the rules of the Special Purpose Port Zone, which make no reference to the Height Specific Control Area. It therefore appears to serve no purpose.	Delete the Height Specific Control Area within the Port Zone.
PrimePort Limited	175.11	Definitions	Definitions	Lifeline Utilities	Considers the definition appropriately includes the Port of Timaru.	Retain as notified.
PrimePort Limited	175.12	Definitions	Definitions	Regionally Significant Infrastructure	The definition appropriately includes the Port of Timaru.	Retain as notified.
PrimePort Limited	175.13	Definitions	Definitions	Port Activity	The definition appropriately reflects the range of activity that occurs within the PORTZ.	Retain as notified.
PrimePort Limited	175.14	Definitions	Definitions	Natural Hazard Sensitive Activity	Considers the number of employees listed (two or more on a full-time basis), is overly restrictive.	Amend definition of Natural Hazard Sensitive Activity as follows: <i>means:</i> <i>Buildings which:</i> <ol style="list-style-type: none"> 1. contain one or more habitable rooms; and / or 2. contain two <u>ten</u> or more employees on a full time basis; and / or 3. are a place of assembly; [...].
PrimePort Limited	175.15	SD - Strategic Direction	Objectives	SD-O8 Infrastructure	Considers the reference to the benefits and recognition of regionally significant infrastructure and lifeline utilities is appropriate.	Retain SD-O8.iv as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
PrimePort Limited	175.16	SD - Strategic Direction	Objectives	SD-O10 Community and Open Space	Considers it is not appropriate for public access along the coastal marine area within the operational area of the Port of Timaru. This is appropriately reflected in the proposed provisions for public access and esplanade reserves and should be similarly reflected in this objective.	Amend SD-O10 Community and Open Space as follows: <i>A range of recreational, social and community facilities and open spaces that meet the long-term needs of the community are enabled, including:</i> <ol style="list-style-type: none"> i. <i>other than within the Port of Timaru, the provision of public access to and along the coastal marine area and margins of identified rivers; and</i> ii. <i>the provision of a network of facilities and open spaces to support densification and new growth areas, including co-location.</i>
PrimePort Limited	175.17	EI - Energy and Infrastructure	Objectives	EI-O2 Adverse effects of Regionally Significant Infrastructure	Supports the provision for regionally significant infrastructure to locate in sensitive environments where there is an operational need.	Retain as notified.
PrimePort Limited	175.18	EI - Energy and Infrastructure	Objectives	EI-O4 Adverse effects on Regionally Significant Infrastructure and Lifeline Utilities	The protection of regionally significant infrastructure and lifeline utilities from other development and reverse sensitivity effects is appropriate, given the value and importance of that infrastructure.	Retain as notified.
PrimePort Limited	175.19	EI - Energy and Infrastructure	Policies	EI-P1 Recognising the benefits of Regionally Significant Infrastructure and Lifeline Utilities	Recognition of the benefits of, and enablement of, regionally significant infrastructure and lifeline utilities from other development and reverse sensitivity effects is appropriate, given the value and importance of that infrastructure.	Retain as notified.
PrimePort Limited	175.20	EI - Energy and Infrastructure	Policies	EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure	Provision for regionally significant infrastructure to locate in sensitive environments where there is a functional and operational need is supported.	Retain as notified.
PrimePort Limited	175.21	EI - Energy and Infrastructure	Policies	EI-P3 Adverse effects on Regionally Significant Infrastructure	The protection of regionally significant infrastructure and lifeline utilities from other development and reverse sensitivity effects is appropriate, given the value and importance of that infrastructure.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
PrimePort Limited	175.22	SW - Stormwater Management	Standards	SW-S2 Stormwater neutrality devices or systems	Considers stormwater neutrality is onerous and impractical for the Port Zone, which been densely developed and has little space for the size of stormwater neutrality devices for large warehouse buildings and extensive sealed areas.	1. Delete SW-S2 ; OR 2. Amend SW-S2 so that Port Zone is excluded.
PrimePort Limited	175.23	SW - Stormwater Management	Standards	SW-S3 Stormwater quantity permission requirements	Considers stormwater neutrality is onerous and impractical for the Port Zone, which been densely developed and has little space for the size of stormwater neutrality devices for large warehouse buildings and extensive sealed areas.	1. Delete SW-S3.2 ; OR 2. Amend SW-S3.2 so that Port Zone is excluded.
PrimePort Limited	175.24	SW - Stormwater Management	Standards	SW-S4 Stormwater quality permission requirements	Considers the standard is impractical and onerous. The removal rates should be expressed as a trigger value, beyond which adverse water quality effects can be expected. Anything less than that trigger should be permitted. Under this rule, a new roof would require reduction of suspended solids by more than 80%, even though a nil reduction would likely still result in a significantly less suspended solids discharge than, for example, a new road.	1. Delete SW-S4 ; OR 2. Amend SW-S4 so that Port Zone is excluded.
PrimePort Limited	175.25	TRAN - Transport	Policies	TRAN-P3 Existing land transport infrastructure	The ongoing operation, maintenance and upgrading of existing land transport infrastructure is appropriate.	Retain as notified.
PrimePort Limited	175.26	TRAN - Transport	Standards	TRAN-S1 Landscaping where five or more at grade car parking spaces are provided for non- residential activities on a site	The Port Zone is a highly modified urban area with no ability to expand to meet future demand for port-related industry. The efficient use of land is critical. Landscaping in car parking areas would undermine efficiency and could cause a health and safety issue given reduced visibility.	Amend TRAN-S1 follows: <i>TRAN-S1 Landscaping where five or more at grade car parking spaces are provided for non-residential activities on a site</i> <i>All Zones <u>except the Port Zone</u></i> <i>[...]</i>
PrimePort Limited	175.27	CL - Contaminated Land	Rules	Note	It is appropriate that the District Plan should contain no rules controlling contaminated land and instead defer to the NES for Assessing and Managing Contaminants in Soil to Protect Human Health.	Retain as notified.
PrimePort Limited	175.28	NH - Natural Hazards	Objectives	NH-O3 Natural hazard mitigation works	Whilst it is agreed that the use of natural features and buffers for natural hazard mitigation is preferable where it practicable, such features are not always sufficient to enable hazard mitigation.	Amend NH-O3 Natural hazard mitigation works as follows: <i>Natural hazard mitigation works reduce risks to people and property, with a preference for the use of natural features and buffers <u>where practicable.</u></i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
PrimePort Limited	175.29	NH - Natural Hazards	Policies	NH-P4 Subdivision, use and development in Flood Assessment Areas, excluding high hazard areas and overland flow paths	The Port Zone is subject to flood hazards including land subject to a 0.5% AEP flood event. Is not practicable to achieve a floor level above that flood level. Also, a lower floor level may in some cases be appropriate, if the building can be designed with resilience, this should be reflected in the policy. Clause (5) specifies that major hazard facilities will not be inundated. This is likely not achievable in the Port Zone, where major hazard facilities are required (for functional and operational reasons) to locate in a Flood Assessment Area.	Amend NH-P4 as follows: <i>NH-P4 Subdivision, use and development in Flood Assessment Areas, excluding high hazard areas and overland flow paths</i> <i>Enable subdivision, use and development (excluding Regionally Significant Infrastructure) in areas subject to inundation by a 0.5% AEP flood event provided that:</i> 1. <i>it is not likely to suffer significant damage in a flood event; and</i> 2. <i>it will not significantly affect the functioning of the flood plain; and</i> <i>it will not generate the need for new or upgraded public natural hazard mitigation works to mitigate or avoid the natural hazard; and</i> 4. <i>a minimum floor level above the 0.5% AEP design flood level can be achieved <u>or the effects of flooding on the building can be mitigated</u>; and</i> 5. <i>major hazard facilities will not be inundated; and</i> 6. <u>5.</u> <i>significant adverse effects on people and property are avoided; and</i> 7. <u>6.</u> <i>increased risk on other sites is avoided as a priority and where this is not practicable, will be appropriately mitigated.</i>
PrimePort Limited	175.30	NH - Natural Hazards	Rules	NH-R5 Regionally Significant Infrastructure - maintenance, replacement and upgrading	Supports the provision for the maintenance, replacement and upgrading of regionally significant infrastructure. Although considers PER-1 is too restrictive, particularly where infrastructure is large scale.	Amend NH- R5 as follows: <i>NH- R5 Regionally Significant Infrastructure - maintenance, replacement and upgrading</i> <i>Activity status: Permitted</i> <i>Where</i> <i>PER-1</i> <i>The infrastructure is within 5 <u>20m</u> of the existing alignment or location; and</i> <i>PER-2</i> <i>The above ground footprint of the infrastructure is not increased by more than 10%.</i>
PrimePort Limited	175.31	NH - Natural Hazards	Standards	NH-S2 Volume of earthworks	Considers the rule lacks clarity as to whether the limits are applied on a per site, project or per zone basis.	Amend NH-S2 Volume of earthworks as follows: <i>Flood Assessment Areas Overlay</i> <i>The earthworks do not exceed:</i> <ul style="list-style-type: none"> • <i>2,000m² in area in any calendar year in a Rural zone <u>site</u>; and</i> • <i>250m² in area in any calendar year in any <u>site within any</u> other zone</i> [...]

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
PrimePort Limited	175.32	HS - Hazardous Substances	Policies	HS-P1 New Major Hazard Facilities and additions to existing Major Hazard Facilities	Under clause 3, means that new or additional major hazard facilities could potentially not establish in the Port Zone. This is impractical and onerous given the operational requirement for those facilities to locate at the Port. Clause 4 provides for Major Hazard Facilities to locate in Natural Hazard Areas where measures are taken to minimise adverse effects, which is a practicable requirement, this clause is therefore supported.	1. Amend HS-P1.3 to exclude its application to the Port Zone; AND 2. Retain HS-P1.4 .
PrimePort Limited	175.33	HS - Hazardous Substances	Policies	HS-P2 Repair and maintenance of existing Major Hazard Facilities	It is important to enable the repair and maintenance of existing Major Hazard Facilities.	Retain as notified.
PrimePort Limited	175.34	HS - Hazardous Substances	Policies	HS-P4 Hazardous facilities (other than Major Hazard Facilities)	Considers Clause 1 is problematic for hazardous facilities located within the Port Zone (the entirety of which is a sensitive environment due to its location within the Coastal Environment Area). Supports clause 2.	Amend HS-P4 as follows: HS-P4 Hazardous facilities (other than Major Hazard Facilities) 1. Enable hazardous facilities (other than Major Hazard Facilities), provided that: <i>a. other than the Port Zone, The facility is located outside of a sensitive environment (except for a Flood Assessment Area); and</i> <i>b. The facility is located within a Flood Assessment Area where the flood hazard can be mitigated; and</i> 2. Other than the Port zone , Only allow hazardous facilities (other than Major Hazard Facilities) in sensitive environments where the risks to the sensitive environments can be avoided in the first instance, or where avoidance is not possible, minimised.
PrimePort Limited	175.35	HS - Hazardous Substances	Rules	HS-R1 Use and/or storage of hazardous substances in a hazardous facility (excluding Major Hazard Facilities)	Considers that PER-1 creates an unnecessary consent burden, as all new hazardous facilities would require resource consent. PER-2 is more reasonable.	Amend HS-R1 as follows: HS-R1 Use and/or storage of hazardous substances in a hazardous facility (excluding Major Hazard Facilities) Activity status: Permitted Where: PER-1 (Excluding the Port Zone) <i>The hazardous facility is located outside a sensitive environment (other than a Flood Assessment Area Overlay); and</i> PER-2 <i>The activity is within a Flood Assessment Area Overlay and the hazardous facility has a finished floor level equal to or higher than the minimum floor level as stated in a Flood Risk Certificate issued in accordance with NH-S1.</i>
PrimePort Limited	175.36	HS - Hazardous Substances	Rules	HS-R2 Maintenance and repair of Major Hazard Facilities	Maintenance and repair of Major Hazard Facilities is necessary and important.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
PrimePort Limited	175.37	HS - Hazardous Substances	Rules	HS-R4 New Major Hazard Facilities and additions to Major Hazard Facilities	Support provision for new Major Hazard Facilities and additions to existing facilities as a discretionary activity.	Retain as notified.
PrimePort Limited	175.38	PA - Public Access	Objectives	PA-O1 Public access	Supports public access to the coastal marine area and notes it should only be restricted in certain circumstances. Considers the wording of this objective is uncertain and requires clarity.	Amend PA-O1 Public access as follows: <i>Public access to and along the coastal marine area and the margins of identified wetlands and rivers is maintained and enhanced, and only restricted where <u>desirable it is incompatible with public health and safety, the sensitivity of the receiving environment or the protection of natural, historic and cultural values of the coastal environment.</u></i>
PrimePort Limited	175.39	PA - Public Access	Policies	PA-P2 Requirements for public access	The policy sets out a range of matters where public access might appropriately be excluded, which are considered appropriate including where public safety risks could be created, and where existing suitable public access points exist in the vicinity.	Retain as notified.
PrimePort Limited	175.40	PA - Public Access	Policies	PA-P4 Limiting public access	Provision for limiting public access in some situations is supported, including as set out in clause (d) to protect public health or safety, and clause (f) the operation of regionally significant infrastructure.	Retain as notified.
PrimePort Limited	175.41	SUB - Subdivision	Policies	SUB-P7 Esplanade reserves and strips	There will be some sites where esplanade reserve or strip provision is not appropriate (other than where already identified in the Proposed Plan), and it is appropriate that the policy set out circumstances where those requirements can be reduced or waived.	Retain as notified.
PrimePort Limited	175.42	SUB - Subdivision	Standards	SUB-S8 Esplanade reserves and strips	There are significant health and safety and security issues, as well as operational efficiency issues, with requiring esplanade reserves and strips within the Port area. Exclusion of the Port from Rule SUB-S8 is appropriate.	Retain as notified.
PrimePort Limited	175.43	CE - Coastal Environment	Objectives	CE-O6 Existing urban activities	It is appropriate to recognise existing urban activities in the Coastal Environment, and the Port of Timaru in particular, and to provide for their ongoing activity. Those urban areas are already highly modified and provision for their ongoing use is an efficient use of existing resources.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
PrimePort Limited	175.44	CE - Coastal Environment	Policies	CE-P3 Identifying coastal hazards	Considers the policy does not recognise that activities within the Port of Timaru have a functional and operational requirement to locate in the Coastal Environment, and this requirement should be a matter for consideration in the risk-based approach.	Amend CE-P3 Identifying coastal hazards as follows: <i>Identify Coastal Hazard Areas on the planning maps and take a risk-based approach to the management of subdivision, use and development based on the following:</i> 1. the sensitivity of the activity or use to loss of life, potential damage from a coastal natural hazard, the need for reliance on emergency services, and the ability for the activity or use to recover after a coastal natural hazard; and 2. the likelihood of adverse effects on people and property from a coastal natural hazard; and 3. the impact on the wider community from the loss of, or damage to, the activity or use; and <i>4. a functional or operational need to locate in a Coastal Hazard Area.</i>
PrimePort Limited	175.45	CE - Coastal Environment	Policies	CE-P9 Anticipated activities	The policy appropriately recognises that urban zoned coastal areas have different qualities than non-urbanised coastal areas.	Retain as notified.
PrimePort Limited	175.46	CE - Coastal Environment	Policies	CE-P10 Preserving the natural character of the Coastal Environment	The policy appropriately recognises that development in existing urban areas will likely be appropriate where it is consistent with the anticipated character and qualities of the zone. It also appropriately recognises the need for Infrastructure to locate there.	Retain as notified.
PrimePort Limited	175.47	CE - Coastal Environment	Policies	CE-P12 Coastal Hazard Areas (excluding Regional Significant Infrastructure)	Clause 2 of this policy is problematic, as “avoid” sets a very high threshold, yet even a small amount of temporary coastal inundation could be deemed to increase the risk of economic harm from a coastal natural hazard (albeit that harm may only fall to the building owner), as “increase” is not quantified. Potentially, no new buildings could establish in the Sea Inundation Overlay of the Port Zone, under this policy.	Amend CE-P12 Coastal Hazard Areas (excluding Regional Significant Infrastructure) as follows: 1. In non-urban areas, avoid subdivision, use and development within the Coastal Erosion Overlay and Sea Water Inundation Overlay where there is a new or increased risk of loss of life, or significant damage to structures or property; 2. Within existing urban areas, <i>other than the Port Zone,</i> avoid increasing the risk of social, economic, or environmental harm from coastal natural hazards.
PrimePort Limited	175.48	CE - Coastal Environment	Policies	CE-P13 Regionally Significant Infrastructure in Coastal Hazard Areas	The policy appropriately provides for Regionally Significant Infrastructure in coastal hazard areas.	Retain as notified.
PrimePort Limited	175.49	CE - Coastal Environment	Policies	CE-P14 Hard engineering natural hazard mitigation within the Coastal Environment	Submitter undertakes hard engineering hazard mitigation on the breakwaters and eastern spurs within the Port of Timaru which are necessary works to control wave action into the Port and restrict movement of sediment not the Port channel and soft engineering solutions are considered insufficient in those locations. Therefore Clause 1 of the policy is supported.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
PrimePort Limited	175.50	CE - Coastal Environment	Rules	CE-R4 Buildings and structures and extensions (excluding Regionally Significant Infrastructure and fences)	CE-R4.1 Provision for buildings and structures as a permitted activity in urban areas of the Coastal Environment area overlay is appropriate. Considers the requirement for the buildings to be able to be made completely watertight may not be able to be economically achieved. Provided the materials of the building below the required minimum floor level are resilient and hazardous substances are not stored below that level (addressed via Rule HS-R1 PER-2), that should be sufficient to mitigate adverse effects from seawater inundation.	1. Retain CE-R4.1 as notified; AND 2. Amend CE-R4.4 as follows: [...] PER-4 <i>That part of the building below the minimum finished floor level as stated in a Flood Risk Certificate issued in accordance with NH-S1 is constructed of <u>flood durable</u> materials that will be watertight and any openings below this level must be capable of being sealed mechanically</i>
PrimePort Limited	175.51	CE - Coastal Environment	Rules	CE-R6 Land disturbance	Support provision for land disturbance in Coastal Environment Area Overlay and Sea Water Inundation Overlay as permitted activities.	Retain as notified.
PrimePort Limited	175.52	CE - Coastal Environment	Rules	CE-R7 Regionally Significant Infrastructure - maintenance and upgrade	Considers the requirement for the buildings to be able to be made completely watertight is unhelpfully onerous and may not be able to be economically achieved. Provided the materials of the building below the required minimum floor level are resilient and hazardous substances are not stored below that level (addressed via Rule HS-R1 PER-2), that should be sufficient to mitigate adverse effects from seawater inundation.	Amend CE-R.7.1 Regionally Significant Infrastructure - maintenance and upgrade as follows: [...] PER-5 <i>That part of the building below the minimum finished floor level as stated in a Flood Risk Certificate issued in accordance with NH-S1 is constructed of <u>flood durable</u> materials that will be watertight and any openings below this level must be capable of being sealed mechanically.</i>
PrimePort Limited	175.53	CE - Coastal Environment	Rules	CE-R8 Regionally Significant Infrastructure - New	Considers the requirement for the buildings to be able to be made completely watertight is unhelpfully onerous and may not be able to be economically achieved. Provided the materials of the building below the required minimum floor level are resilient and hazardous substances are not stored below that level (addressed via Rule HS-R1 PER-2), that should be sufficient to mitigate adverse effects from seawater inundation.	Amend CE- R.8.1 Regionally Significant Infrastructure - new as follows: [...] PER-4 <i>That part of the building below the minimum finished floor level as stated in a Flood Risk Certificate issued in accordance with NH-S1 is constructed of <u>flood durable</u> materials that will be watertight and any openings below this level must be capable of being sealed mechanically.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
PrimePort Limited	175.54	CE - Coastal Environment	Rules	CE-R9 Natural hazard mitigation works, including earthworks - maintenance, replacement and upgrading	Submitter undertakes natural hazard mitigation works within/adjoining the Port Zone. Considers Rule CE-R9 needs to make similar provision for Port maintenance of existing works.	Amend CE- R9 as follows: CE- R9 Natural hazard mitigation works, including earthworks - maintenance, replacement and upgrading This rule does not apply to natural hazard mitigation works only involving the planting of vegetation. [...] PER-4 <u>The activity is undertaken by PrimePort and is within or adjacent to the Port Zone and is required to protect the ongoing operation of the Port.</u>
PrimePort Limited	175.55	CE - Coastal Environment	Rules	CE-R12 Natural hazard mitigation works, including Earthworks - New	The rule appropriately makes provision for Port natural hazard mitigation works.	Retain CE-R12 RDIS-2 as notified.
PrimePort Limited	175.56	CE - Coastal Environment	Standards	CE-S1 Height of buildings and structures	Considers it is appropriate for this rule to defer to the underlying Port Zone height standard.	Retain as notified.
PrimePort Limited	175.57	CE - Coastal Environment	Standards	CE-S2 Site coverage	Considers it is appropriate for this rule to defer to the underlying urban zone coverage standard.	Retain as notified.
PrimePort Limited	175.58	CE - Coastal Environment	Standards	CE-S3 Building and structure external materials	It is appropriate for the Port Zone to be exempted from this standard, noting for some buildings in the Port Zone there is a requirement for highly reflective colour to be utilised (e.g. cool stores, fuel storage).	Retain as notified.
PrimePort Limited	175.59	LIGHT - Light	Introduction	General	Considers the final paragraph of the introduction accurately reflects the role of the Light Management Plan in managing lighting within the Port Zone, and recognises the importance of lighting for health and safety purposes for 24 hour operation of the Port.	Retain Introduction as notified.
PrimePort Limited	175.60	LIGHT - Light	Rules	LIGHT-R1 Artificial outdoor lighting outside light sensitive areas	Supports the exclusion of the Port Zone from this rule, as Port lighting is more appropriately managed under LIGHT-R1.2. Light R1.2 provides appropriate flexibility for night time Port operations whilst ensuring that exterior lighting does not unduly adversely affect adjoining residential zones.	Retain the exclusion of the Port Zone from LIGHT-R1.1 and LIGHT-R1.2 as notified.
PrimePort Limited	175.61	LIGHT - Light	Standards	LIGHT-S1 General lighting standards	Supports Port Zone exclusion from this standard, lighting standards are addressed in the adopted Light Management Plan for the Port.	Retain the exclusion of the Port Zone from LIGHT-S1 as notified.
PrimePort Limited	175.62	NOISE - Noise	Objectives	NOISE-O2 Reverse sensitivity	The objective appropriately recognises the potential for the Port to be adversely affected by reverse sensitivity effects, so as not to compromise its operation.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
PrimePort Limited	175.63	NOISE - Noise	Policies	NOISE-P5 Reverse sensitivity	The policy appropriately reflects the need to protect the Port from potential adverse reverse sensitivity effects, so as not to compromise its operation.	Retain as notified.
PrimePort Limited	175.64	NOISE - Noise	Policies	NOISE-P7 Noise sensitive activities within noise control boundaries	The policy appropriately reflects the need to protect the Port from potential adverse reverse sensitivity effects, so as not to compromise its operation.	Retain as notified.
PrimePort Limited	175.65	NOISE - Noise	Rules	NOISE-R1 Activities generating noise not otherwise specified in the Rules section	Support application of this rule only to activities generating noise not otherwise specified in the Rules section. Noise from activities generated in the Port Zone is more appropriately controlled under Rule NOISE-R8 only.	Retain NOISE-R1 as notified, which does not apply to noise generated within the Port Zone.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
PrimePort Limited	175.66	NOISE - Noise	Rules	NOISE-R8 Noise from activities within the Port Zone	<p>Provision for the management of noise from activities within the Port Zone via a specific rule is supported, given the distinctive circumstances of the Port of Timaru, being regionally significant infrastructure that requires 24 hour operation. It is also appropriate that noise from core Port activities is measured via NZS 6809:1999 Acoustics Port Noise Management and Land use Planning, as that standard was developed specifically to address the particular characteristics and circumstances of Port noise.</p> <p>However, the rule as drafted has several issues:</p> <ul style="list-style-type: none"> - the Port Noise Control Boundaries (Inner and Outer) are only intended to apply outside the Port Zone - The Port Noise Control Boundaries were modelled based on Port noise generation from within Precinct 7 only - There appears to be no noise rule applying to Port Zone activities that sit outside the Port Noise Control Boundaries, but inside the Port Zone - The measurement of industrial and other noise within the Port Zone (i.e. non-Port industrial and other activity occurring outside Precinct 7) is more appropriately measured under NZS 6801:2008 Acoustics - Measurement of environmental sound, and assessed in accordance with NZS 6802:2008 Acoustics - Environmental noise. 	<p>Amend NOISE-R8 Noise from activities within the Port Zone as follows:</p> <p>[...]</p> <p>PER-1 <u>Within Precinct 7, the maximum noise generated from activities is measured in accordance with NZS 6809:1999 Acoustics Port Noise Management and Land Use Planning; and</u></p> <p>PER-2 <u>Except Precinct 7, NOISE-S1 is complied with; and</u></p> <p>PER-2 3 <u>When measured at any point outside the Port Zone, at or landward of the Port Noise Inner control boundary shown on the planning maps, the following noise limits apply within Precinct 7:</u></p> <ol style="list-style-type: none"> 1. the 5 day L_{dn} noise limit must not exceed 65 dB L_{dn}; 2. L_{Aeq} 'night' (10pm to 7am) must not exceed 60 dB L_{Aeq (9hours)} provided that no single 15 minute measurement will exceed 65 dB L_{Aeq} and 85dBA L_{Amax} <p>PER-3 4 <u>When measured at any point outside the Port Zone, at or landward of the Port noise outer control boundary shown on the planning maps, the following noise limit applies within Precinct 7:</u></p> <ol style="list-style-type: none"> 1. on any day between 10pm to 7am the following day, noise generated must not exceed 52 dB L_{Aeq (9hours)} provided that no single 15 minute sound measurement level must not exceed 57 dB L_{Aeq} and 77 dB L_{Amax}; <p>PER-5 <u>Except Precinct 7, NOISE-S2 is complied with for the following zones only:</u></p> <ol style="list-style-type: none"> 1. <u>General Residential Zone;</u> 2. <u>Medium Density Residential Zone;</u> 3. <u>Mixed Use Zone;</u> 4. <u>Central City Commercial.</u> <p>Note: For the purpose of Port Noise, daytime is defined as 7am to 10pm on any day, and night time is defined as 10pm to 7am the following day.</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
PrimePort Limited	175.67	NOISE - Noise	Rules	NOISE-R9 Any new building for use by a noise sensitive activity and alterations to existing buildings for use by a noise sensitive activity (not listed in NOISE-R12)	The rule is appropriate to manage both potential adverse noise effects on inhabitants from regionally significant infrastructure (in the case of the Port) and potential reverse sensitivity effects.	Retain as notified.
PrimePort Limited	175.68	NOISE - Noise	Rules	NOISE-R12 New noise sensitive activities, alterations to existing buildings for use by a noise sensitive activity or subdivision to accommodate a noise sensitive activity	The rule appropriately provides a consenting pathway for establishing new noise sensitive activities in Medium Density Residential and City Centre zones within the Inner Control Boundary that is not overly restrictive but allows for full consideration of potential noise effects.	Retain NOISE-R12.1 as notified.
PrimePort Limited	175.69	NOISE - Noise	Standards	Table 24 Noise Performance Standards	<p>Clause (2) makes clear that noise from the Port Zone does not apply to the MDRZ between the Terrace and Main South Railway Line. Noise from the Port is instead subject to Rule NOISE-R8 and the Port Noise Boundary contours.</p> <p>Clause (3)(d) refers General Industrial Zone that is located to the east of the Main South Railway Line and forming part of, or adjoining, the Port of Timaru. All such land is proposed to be zoned Port Zone, not General Industrial Zone.</p>	<p>Amend Table 24 - Noise performance standards as follows:</p> <p>Retain:</p> <p><i>2. Within any part of a site in the Medium Density Residential Zone, but, where noise is generated from within the Port Zone, excluding those sites located between the Terrace and the Main South Railway Line.</i></p> <p>AND</p> <p>Amend:</p> <p><i>3. Within any part of a site in the following zones:</i></p> <ul style="list-style-type: none"> <i>a. Large Format Retail Zone</i> <i>b. Town Centre Zone</i> <i>c. City Centre Zone</i> <i>d. General Industrial Zone, excluding those sites located to the east of the Main South Railway Line and forming part of, or adjoining the Port of Timaru.</i> <p>[...]</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
PrimePort Limited	175.70	NOISE - Noise	Standards	NOISE-S3 Acoustic insulation	Requirements for acoustic insulation in new or altered buildings for noise sensitive activities within the Outer Control Boundary for the Port Noise Control Overlay will help reduce the potential for reverse sensitivity effects on the Port Zone, and assist with mitigating potential adverse noise effects on noise sensitive activities.	Retain NOISE-S3.2 as notified.
PrimePort Limited	175.71	RELO - Relocated Buildings and Shipping Containers	Policies	RELO-P1 Relocated buildings and shipping containers in General Industrial Zone	Notes that shipping containers and relocatable buildings are common in the Port Zone and, in respect of shipping containers in particular, fundamental to its operations.	Retain as notified.
PrimePort Limited	175.72	RELO - Relocated Buildings and Shipping Containers	Rules	RELO-R1 Placement of a relocated building	Notes that relocatable buildings are common in the Port Zone and it is appropriate provision is made for them as a permitted activity.	Retain as notified.
PrimePort Limited	175.73	RELO - Relocated Buildings and Shipping Containers	Rules	RELO-R2 Placement of a shipping container	Shipping containers are common in the Port Zone and fundamental to its operations.	Retain as notified.
PrimePort Limited	175.74	SIGN - Signs	Rules	SIGN-R4 Any signs not otherwise address in the Rules section of this chapter	Considers the signage provisions in SIGN-R4.3 is appropriately flexible for the Port Zone.	Retain SIGN-R4.3 as notified.
PrimePort Limited	175.75	SIGN - Signs	Standards	SIGN-S3 Maximum height of signage	Considers the proposed height limits are appropriate for the Port Zone.	Retain SIGN-S3.2 as notified.
PrimePort Limited	175.76	SIGN - Signs	Standards	SIGN-S4 Maximum area of a sign	Considers the signage provision is appropriately flexible for the Port Zone.	Retain SIGN-S4.6 as notified.
PrimePort Limited	175.77	SIGN - Signs	Standards	SIGN-S6 Maximum number of signs (not including Official signs and Temporary signs)	Considers the signage provision is appropriately flexible for the Port Zone.	Retain SIGN-S6.1 as notified.
PrimePort Limited	175.78	PORTZ - Port Zone	Introduction	General	The introduction reflects the nature and range of activities undertaken in the Port Zone and the value of the Port to Timaru.	Retain Introduction as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
PrimePort Limited	175.79	PORTZ - Port Zone	Objectives	PORTZ-O1 Purpose of the Port Zone	The objective appropriately provides for the establishment, operation and ongoing growth of activities in the Port Zone whilst also recognising the role and amenity values of immediately adjoining zones.	Retain as notified.
PrimePort Limited	175.80	PORTZ - Port Zone	Objectives	PREC7-O1 Purpose of the Port Operational Area	The objective reflects the purpose of the Port Operational Area.	Retain as notified.
PrimePort Limited	175.81	PORTZ - Port Zone	Policies	PREC7 - P1 Port operation, use and development	The efficient operation, use and development of the Port is vital to the wellbeing of the District.	Retain as notified.
PrimePort Limited	175.82	PORTZ - Port Zone	Policies	PORTZ-P1 Compatible activities in the Port Zone	The policy will assist in guiding the range of industrial, commercial and residential activity that are not Port Activities but which nonetheless may appropriately locate in the zone.	Retain as notified.
PrimePort Limited	175.83	PORTZ - Port Zone	Policies	PORTZ-P2 Effects of Port activities	The policy provides for critical Port Activities within the zone, and recognises that adverse effects from Port Activities need to be mitigated as far as practicable, but that nevertheless the functional needs of the Port may constrain the practicality of some mitigation (e.g. the Port requires 24 hour operation and so must therefore be well lit for health and safety reasons).	Retain as notified.
PrimePort Limited	175.84	PORTZ - Port Zone	Policies	PORTZ-P3 Offensive trades	Considers that offensive trades should be able to establish in the Port Zone but should also require mitigation to ensure they don't create unreasonable adverse nuisance effects on adjoining zones. The proposed policy reflects this.	Retain as notified.
PrimePort Limited	175.85	PORTZ - Port Zone	Rules	PORTZ-R1 Port activities	The rule provides flexibility to establish a range of Port Activities in the Port Zone as a permitted activity.	Retain as notified.
PrimePort Limited	175.86	PORTZ - Port Zone	Rules	PORTZ-R2 Emergency service facilities, including coastguard, and ancillary activities	Emergency service facilities, including the coastguard, are an important activity in the Port Zone and it is appropriate it is provided for as a permitted activity.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
PrimePort Limited	175.87	PORTZ - Port Zone	Rules	PORTZ-R3 Industrial activity and ancillary activities not addressed in PORTZ-R1	<p>PORTZ-R3.1 - A range of industrial and ancillary activities occur in the Port Zone currently (outside the Port Operational Area), primarily where they have a direct relationship with Port Activities.. It is appropriate that industrial activity continues to be permitted. As both residential activity and offensive trade activity may only be appropriate in some restricted circumstances, fully discretionary activity status is suitable to allow full consideration of the potential effects of those activities.</p> <p>PORTZ-R3.2 -While there may be instances where industrial activities are appropriate within the Port Operational Area, for the most part that area is anticipated to be used for Port Activities only and given the very limited potential for expansion of the Port land area, it is vital that the Port Operational Area be protected from uses that do not have a necessity to be there.</p>	Retain PORTZ-R3.1 and PORTZ-R3.2 as notified.
PrimePort Limited	175.88	PORTZ - Port Zone	Rules	PORTZ-R4 Residential activity and associated buildings and structures	Considers that residential activity in the Port Zone should only be allowed where it is ancillary to a Port Activity or industrial activity. This rule appropriately reflects that.	Retain as notified.
PrimePort Limited	175.89	PORTZ - Port Zone	Rules	PORTZ-R6 Any other activity not listed in this chapter	Considers that the fully discretionary activity status is appropriate for all other activities in the Port Zone, as it will allow for consideration of all potential effects associated with any unanticipated activity in the zone.	Retain as notified.
PrimePort Limited	175.90	PORTZ - Port Zone	Standards	PORTZ-S1 Height of buildings and structures	The proposed height limit allows sufficient flexibility to provide for a range of Port and industrial related activity. The proposed exemptions are supported as the listed activities are key aspects of the function and operation of the Port.	Retain as notified.
PrimePort Limited	175.91	PORTZ - Port Zone	Standards	PORTZ-S2 Height in relation to boundary	So as to assist with managing and mitigating potential adverse effects of tall structures and buildings in close proximity to a residential zone, it is appropriate that recession planes be applied at the boundary of any residential zone.	Retain as notified.
PrimePort Limited	175.92	PORTZ - Port Zone	Standards	PORTZ-S3 Building colour and reflectivity	So as to assist with managing and mitigating potential adverse effects of highly reflective buildings in close proximity to a residential zone, it is appropriate that minimum reflectivity levels be stipulated.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
PrimePort Limited	175.93	PORTZ - Port Zone	Standards	PORTZ-S4 Outdoor storage	To assist with managing and mitigating potential adverse effects of outdoor storage areas that are located in close proximity residential zones, it is appropriate to require storage to be setback from any shared boundaries. Given the important role of outdoor storage in the Port Zone, 15m is an appropriate set back.	Retain as notified.
PrimePort Limited	175.94	SCHED11 - Schedule of Public Access Provisions	SCHED11 - Schedule of Public Access Provisions	General	The land adjoining the Coastal Marine Area north of Talbot Street is a working part of the Port and periodically subject to public closure for health and safety reasons. Access along the Coastal Marine Area north of Talbot Street should be excluded.	Amend SCHED11 - Schedule of Public Access Provisions so that the Public Access Provisions also do not apply to land beside the Coastal Marine Area, between Talbot and Charman Streets.
PrimePort Limited	175.95	SCHED2 - Schedule of Major Hazard Facilities	SCHED2 - Schedule of Major Hazard Facilities	General	The schedule for Major Hazard Facilities does not match the mapped facilities. The planning maps refer "SHF" while the schedule refers "MHF". The descriptions of the MHF in the schedule do not match the mapped facilities.	Amend SCHED2 - Schedule of Major Hazard Facilities to correctly reference the Major Hazard Facilities.
PrimePort Limited	175.96	SCHED12 - Schedule of Esplanade Provisions	SCHED12 - Schedule of Esplanade Provisions	General	The area of land north of Talbot Street within the Port Zone, being land contained within Lot 2 DP 326718, forms part of the working Port area and may on occasion require closure for health and safety reasons, or may be developed for Port purposes. Provision for an esplanade reserve is inconsistent with those uses, nor is an esplanade reserve required in that location given public access can be gained to the coast from Talbot Street, the adjoining Open Space Zone and along the coast itself. Exclusion of esplanade provision requirements from Timaru Port is appropriate, given health, safety and security concerns within the Port area.	1. Amend SCHED12 - Schedule of Esplanade Provisions to delete the Lot 2 DP 326718; AND 2. Retain within SCHED12 the exclusion for Timaru Port, including that land between Charman Street and Talbot Street.
Connexa Limited	176.1	Description of the District	Infrastructure	General	Supports the Introduction which notes that the Timaru District contains Regionally Significant Infrastructure, which is specified as including telecommunication facilities.	Retain Description of the District Infrastructure as notified.
Connexa Limited	176.2	Statutory Context	Relationship with Other Planning Documents	General	Supports the statement detailing that the Council is required to enforce any relevant National Environmental Standard, and that Plan rules may not duplicate National Environmental Standard provisions (unless specified).	Retain Statutory Context Relationship with Other Planning Documents as notified.
Connexa Limited	176.3	Definitions	Definitions	Antenna	Supports the definition of Antenna as it is the NESTF definition.	Retain as notified.
Connexa Limited	176.4	Definitions	Definitions	Cabinet	Supports the definition of Cabinet as it is the NESTF definition.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Connexa Limited	176.5	Definitions	Definitions	Customer connection	Supports the definition of Customer Connection which clearly includes part or all of any structure, pipe, equipment or cable that relates to radio communication or telecommunication lines that connect a network utility to a premises for the purpose of providing service to a customer.	Retain as notified.
Connexa Limited	176.6	Definitions	Definitions	Functional need	Supports the definition of Functional Need as it is the National Planning Standards definition.	Retain as notified.
Connexa Limited	176.7	Definitions	Definitions	Height for network utility structure	Supports the definition of Height For Network Utility Structure as it clearly excludes ancillary utility equipment, omni directional 'whip' antennas, GPS antennas, earth peaks and lightning rods.	Retain as notified.
Connexa Limited	176.8	Definitions	Definitions	Infrastructure	Considers the definition of Infrastructure is appropriate and is supported.	Retain as notified.
Connexa Limited	176.9	Definitions	Definitions	Land disturbance	Supports the definition of Land Disturbance as it clearly allows for disturbance that does not permanently alter the profile, contour, or height of the land, e.g., trenching.	Retain as notified.
Connexa Limited	176.10	Definitions	Definitions	Lifeline utilities	Supports the definition of Lifeline Utilities as it is the Civil Defence Emergency Management Act 2002 definition, and clearly includes telecommunication.	Retain as notified.
Connexa Limited	176.11	Definitions	Definitions	Maintenance	Considers the definition is clear as to what is within the ambit of maintenance.	Retain as notified.
Connexa Limited	176.12	Definitions	Definitions	Network utility	Considers the definition makes it clear what a Network Utility is, linking it to the definition of Network Utility Operator in the RMA.	Retain as notified.
Connexa Limited	176.13	Definitions	Definitions	Network utility operator	Supports the definition of Network Utility Operator as it is the RMA definition of Network Utility Operator.	Retain as notified.
Connexa Limited	176.14	Definitions	Definitions	Operational need	Supports the definition of Operational Need as it is the National Planning Standards definition.	Retain as notified.
Connexa Limited	176.15	Definitions	Definitions	Pole [in relation to infrastructure and energy]	Considers lattice structures should be provided for within the definition, on the basis that the NESTF definition of pole clearly provides for these.	Amend the definition of Pole [in relation to infrastructure and energy] as follows: <i>In relation to Energy and infrastructure chapter, means a non-lattice structure that supports conductors, lines, cables, antennas, lights or cameras, but is not a tower, and includes foundations and hardware associated with the structure such as insulators, cross arms and guywires.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Connexa Limited	176.16	Definitions	Definitions	Regionally significant infrastructure	Considers that the Telecommunications Act 2001 definition of telecommunications service, should be used in the PDP instead of telecommunication facility, given it is statutorily defined.	Amend the definition of Regionally Significant Infrastructure as follows: Regionally Significant Infrastructure is: <i>a. Strategic land transport network and arterial roads</i> <i>b. Timaru Airport</i> <i>c. Port of Timaru</i> <i>d. Telecommunication facilities services</i> <i>e. National, regional and local renewable electricity generation activities of any scale</i> [...]
Connexa Limited	176.17	Definitions	Definitions	Repair	Supports the definition of Repair as it is clear as to what is within the ambit of repair.	Retain as notified.
Connexa Limited	176.18	Definitions	Definitions	Replacement	Supports the definition of Replacement as it is clear as to what is within the ambit of repair.	Retain as notified.
Connexa Limited	176.19	Definitions	Definitions	Reverse sensitivity	Notes that reverse sensitivity effects can occur on telecommunication companies, and this accurate definition of what those effects are, is supported.	Retain as notified.
Connexa Limited	176.20	Definitions	Definitions	Self-contained power unit	Supports the definition of Self-Contained Power Unit as it is the NESTF definition.	Retain as notified.
Connexa Limited	176.21	Definitions	Definitions	Small cell unit	Supports the definition of Small Cell Unit as it is the NESTF definition.	Retain as notified.
Connexa Limited	176.22	Definitions	Definitions	Structure	Supports the definition of Structure as it is the RMA definition.	Retain as notified.
Connexa Limited	176.23	Definitions	Definitions	Telecommunication kiosk	Not specified.	Retain as notified.
Connexa Limited	176.24	Definitions	Definitions	Tower [in relation to energy and infrastructure chapter]	Notes that the definition of Tower conflicts with the definition of Pole in the NESTF. As a consequence of submission on the definition of Pole, the definition of Tower should also be amended so there is alignment between the PDP and NESTF is requested. Alternatively, the definition of Tower can be deleted, and the definition of Pole solely relied on in the PDP, with effects of such structures controlled by permitted standards regarding pole height and pole diameter/width.	Amend the definition of Tower [in relation to energy and infrastructure chapter] as follows: <i>In relation to Energy and Infrastructure chapter, means a steel-lattice structure that supports conductors, lines, cables or antennas (other than telecommunication equipment). A tower includes the foundations and hardware associated with the structure such as insulators, cross arms and guywires.</i> OR Delete the definition of Tower [In Relation to Energy and Infrastructure Chapter] in its entirety.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Connexa Limited	176.25	Definitions	Definitions	Upgrading / Upgrade	Considers the definition should not include reference to Replacement as that term is separately defined in the PDP and therefore is a separate activity. The reference to Replacement should be deleted for clarity.	Amend the definition of Upgrading/Upgrade as follows: <i>means the replacement, renewal or improvement of infrastructure that results in an increase in carrying capacity <u>and size</u>, but excludes replacement, repair and maintenance.</i>
Connexa Limited	176.26	Definitions	Definitions	New	Considers that a new definition of Line, being the Telecommunications Act 2001 definition, should be added to the PDP.	Add a new definition into the PDP as follows: <u>Line</u> <i>(a) means a wire or a conductor of any other k reception of signs, signals, impulses, writing, images, sounds, instruction, information, or intelligence of any nature by means of any electromagnetic system; and</i> <i>(b) includes</i> <i>(i) any pole, insulator, casing, fixture, tunnel, or other equipment or material used or intended to be used for supporting, enclosing, surrounding, or protecting any of those wires or conductors; and</i> <i>(ii) any part of a line.</i>
Connexa Limited	176.27	Definitions	Definitions	New	Considers that a definition of radio communication facilities is needed and should be a replica of the definition included in the Radio communications Act 1989.	Add a new definition into the PDP as follows: <u>Radio Communications</u> <i>has the same meaning as in the Radio communications Act 1989 (as set out in the box below) means any transmission or reception of signs, signals, writing, images, sounds, or intelligence of any nature by radio waves.</i>
Connexa Limited	176.28	Abbreviations	Abbreviations	NESTF	Considers that the year that the NESTF was issued could be added for consistency with other NES's referenced in this section.	Amend the abbreviation for NESTF as follows: <u>NESTF</u> <u>National Environmental Standards for Telecommunication Facilities 2016.</u>
Connexa Limited	176.29	National Environmental Standards	National environmental standards	National environmental standards (NESs)	Considers that the National Environmental Standards subsection of the National Direction Instruments section reinforces to plan users the discussion of National Environmental Standards under the Statutory Context subsection in the How the Plan Works.	Retain the National Direction Instruments section as notified.
Connexa Limited	176.30	Regulations	Regulations	General	Supports the reference to the Resource Management (Network Utility Operations) Regulations 2016.	Retain Regulations as notified.
Connexa Limited	176.31	SD - Strategic Direction	Objectives	SD-O1 Residential Areas and Activities	Considers the objective should be widened to be infrastructure more generally, as more than sewer and water infrastructure is necessary to service rural lifestyle development. Such a change would also provide for better alignment between SD-O1 and SD-O8.	Amend SD-O1 as follows: <u>SD-O1 Residential Areas and Activities</u> <i>i. There is sufficient residential development capacity [...] limited rural lifestyle development opportunities are provided where they concentrate and are attached to existing urban areas, achieve a coordinated pattern of development and are capable of efficiently connecting to reticulated sewer and water infrastructure; and [...].</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Connexa Limited	176.32	SD - Strategic Direction	Objectives	SD-O8 Infrastructure	Supports that SD-O8 clearly seeks that the benefits of regionally significant infrastructure and lifeline utilities are provided for across the district.	Retain as notified.
Connexa Limited	176.33	UFD - Urban Form and Development	Objectives	UFD-O1 Settlement Patterns	Considers it is unclear what 'efficient use of infrastructure' is. Submitter considers that a consolidated and integrated settlement pattern that is integrated with infrastructure is clearer and more appropriate.	Amend UFD-O1 as follows: UFD-O1 Settlement Patterns <i>A consolidated and integrated settlement pattern that:</i> <i>i. efficiently accommodates future growth and capacity[...];</i> <i>ii. is integrated with the efficient use of infrastructure;</i> <i>[...];</i>
Connexa Limited	176.34	EI - Energy and Infrastructure	Introduction	The Infrastructure and Energy Chapter Introduction	Supports the statement 'in the case of conflict with any other provision in the District Plan, the NESETA and NESTF prevail'. But the submitter considers that similar direction should be provided on how the rules in the Energy and Infrastructure Chapter override the respective zone provisions. A reminder in the introduction is helpful.	Amend Introduction to the Infrastructure and Energy Chapter as follows: <i>[...]</i> <i>In the case of conflict with any other provision in the District Plan, the NESETA and NESTF prevail.</i> <i>The provisions in this chapter override the respective Zone provisions in Part 3 Area-Specific Matters, unless otherwise specified in this chapter.</i>
Connexa Limited	176.35	EI - Energy and Infrastructure	Objectives	EI-O1 Regionally Significant Infrastructure	Considers the title of the objective should include lifeline utilities, given they are provided for in the body of the objectives.	Amend the title of EI-O1 as follows: <i>EI-O1 Regionally Significant Infrastructure and Lifeline Utilities.</i>
Connexa Limited	176.36	EI - Energy and Infrastructure	Objectives	EI-O2 Adverse effects of Regionally Significant Infrastructure	Considers there is a cross reference to the relevant objectives for the underlying zone which is inappropriate, as the Energy and Infrastructure chapter should be standalone, and the objectives in the zone chapters do not provide helpful guidance for the avoidance, remediation or mitigation of adverse effects from regionally significant infrastructure.	Amend EI-O2 as follows: <i>EI-O2 Adverse effects of Regionally Significant Infrastructure and Lifeline Activities</i> <i>The adverse effects of Regionally Significant Infrastructure and Lifeline Utilities:</i> <i>1. are avoided in sensitive environments unless there is a functional or operational need for the infrastructure to be in that location, in which case they must be remedied or mitigated; and</i> <i>2. are avoided, remedied or mitigated to achieve the relevant objectives for the underlying zone in other areas.</i>
Connexa Limited	176.37	EI - Energy and Infrastructure	Objectives	EI-O3 Adverse effects of other infrastructure	Considers the objective should not reference the relevant objectives for the underlying zone in other areas. Further, there can be a functional and operational need which requires consideration.	Amend EI-O3 as follows: <i>EI-O3 Adverse effects of other Infrastructure</i> <i>1. are avoided on the identified characteristics and values of the sensitive environments the infrastructure is located within, unless there is a functional or operational need for the infrastructure to be in that location, in which case they must be remedied or mitigated; and</i> <i>2. are avoided, remedied or mitigated to achieve the relevant objectives for the underlying zone in other areas.</i>
Connexa Limited	176.38	EI - Energy and Infrastructure	Objectives	EI-O4 Adverse effects on Regionally Significant Infrastructure and	Considers that EI-O4 appropriately requires the recognition of reverse sensitivity effects on Regionally Significant Infrastructure and Lifeline Utilities.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
				Lifeline Utilities		
Connexa Limited	176.39	EI - Energy and Infrastructure	Policies	EI-P1 Recognising the benefits of Regionally Significant Infrastructure and Lifeline Utilities	Partly supports EI-P1 in that it recognises the benefits of RSI and Lifeline Utilities and allows for considerations of new technologies. Considers that Clause 2 is unnecessary. It is at times of emergency that lifeline utilities, in particular, should be operational.	Amend EI-P1 as follows: EI-P1 Recognising the benefits of Regionally Significant Infrastructure and Lifeline Utilities <i>Recognise the benefits of Regionally Significant Infrastructure and Lifeline Utilities by:</i> 1. <i>enabling their operation, maintenance, repair, upgrade, development</i> 2. enabling their removal during an emergency; and 3. <i>recognising their functional needs or operational needs;</i> [...]
Connexa Limited	176.40	EI - Energy and Infrastructure	Policies	EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure	Considers that: 1. given EI-P2 directly discusses Regionally Significant Infrastructure and other infrastructure, it should also specifically mention lifeline utilities for consistency. 2. it is not appropriate for the policy to seek that infrastructure be consistent with the character of an area. the policy should also recognise that it is not appropriate for all infrastructure to be placed underground.	Amend EI-P2 as follows: EI-P2 Managing adverse effects of Regionally Significant Infrastructure, <u>Lifeline Utilities</u> and other infrastructure 1. <i>Provide for Regionally Significant Infrastructure, <u>lifeline utilities</u> and other infrastructure where any adverse effects are appropriately managed by:</i> a. [...]; and b. <i>controlling the height, bulk and location of Regionally Significant Infrastructure and other infrastructure, <u>consistent with to complement</u> the role, function, character and identified qualities of the underlying zone; and</i> c. [...]. d. <i>requiring the undergrounding of network <u>utilities utility lines</u> in new areas of urban development; and</i> e. [...]. f. [...]. g. <i>requiring other infrastructure to adopt sensitive design to integrate within the site, existing built form and/or landform and to <u>maintain complement</u> the character and qualities of the surrounding area;</i> <i>while:</i> 2. <i>recognising the functional or operational need of Regionally Significant Infrastructure, <u>lifeline utilities</u> and other infrastructure activities, and having regard to:</i> [...].
Connexa Limited	176.41	EI - Energy and Infrastructure	Policies	EI-P3 Adverse effects on Regionally Significant Infrastructure	Supports the policy that appropriately provides direction for reverse sensitivity effects management on regionally significant infrastructure and lifeline utilities.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Connexa Limited	176.42	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R1 Maintenance and repair, or removal of infrastructure not otherwise addressed by another rule in this chapter	Considers it is necessary to permit the maintenance, repair and removal of infrastructure.	Retain as notified.
Connexa Limited	176.43	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R2 Upgrading of underground infrastructure, not otherwise addressed by another rule in this chapter	Considers it is necessary to permit the upgrading of underground infrastructure. It is noted that EW-R1 does not apply to earthworks for infrastructure permitted in the Energy and Infrastructure chapter. This is appropriate.	Retain as notified.
Connexa Limited	176.44	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R3 New underground infrastructure (including customers connections) not otherwise addressed by another rule in this chapter	Considers that permitting the installation of new underground infrastructure is necessary.	Retain as notified.
Connexa Limited	176.45	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R4 Upgrading of above ground network utilities not otherwise addressed by another rule in this chapter	Considers that permitting the upgrading of above ground infrastructure is necessary.	Retain as notified.
Connexa Limited	176.46	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R5 Vehicle access tracks for network utilities, including ancillary access tracks	Considers that permitting vehicle access tracks for network utilities is appropriate. The sub-clauses of the rule provide for an appropriate track, and the matters of discretion are appropriate.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Connexa Limited	176.47	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R6 Above ground customer connections	Considers that permitting above ground customer connections in all zones is appropriate, and limiting the number of poles in more densely populated zone types is supported.	Retain as notified.
Connexa Limited	176.48	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R7 Temporary network utilities, including generators	Supports the permitting temporary network utilities for a period of up to 12 months operation.	Retain as notified.
Connexa Limited	176.49	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R9 New network utilities within existing fully enclosed buildings	Supports that new network utilities enclosed within existing buildings are permitted.	Retain as notified.
Connexa Limited	176.50	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R10 Navigational aids, sensing and environmental monitoring equipment (including air quality and meteorological)	Telecommunications by facilitating the “Internet of Things” (IoT) describes physical objects with sensors, processing ability, software and other technologies that connect and exchange data with other devices and systems over the internet. Matters such as sensing and environmental monitoring are supported.	Retain as notified.
Connexa Limited	176.51	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R13 New overhead telecommunication lines and associated support structures excluding customer connections	<p>Considers permitting new overhead lines in the general rural, general industrial and port zone is appropriate.</p> <p>Considers these zone types should be expanded to include commercial and mixed use zones, as these zones tend to have larger buildings which comfortably assimilate overhead lines.</p> <p>The matters of discretion are appropriate.</p>	<p>Amend EI-R13 as follows:</p> <p><i>EI-R13 New overhead telecommunication lines and associated support structures excluding customer connections.</i></p> <p><i>1. General Rural Zone, General Industrial Zone Port Zone <u>and Commercial and Mixed-Use Zones</u></i></p> <p><i>Activity Status: Permitted</i></p> <p><i>[...]</i></p> <p><i>2. All Zones other than the General Rural Zone, General Industrial Zone, <u>and Port Zone and Commercial and Mixed-Use Zones</u></i></p> <p><i>Activity Status: Restricted Discretionary</i></p> <p><i>[...]</i></p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Connexa Limited	176.52	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R14 Telecommunications kiosk	<p>Support the permitted activity status in all zones.</p> <p>Considers Clause 2 should be amended so that setbacks only apply to side and rear boundaries.</p> <p>As notified, a telecommunication kiosk is permitted in legal road without the need for setbacks. This is supported.</p> <p>However, it does mean such a structure can be established with no setback from the front boundary in legal road, but if it were to be on the other side of that boundary it would require a 2m setback. This should be aligned as per the relief sought.</p>	<p>Amend EI-R14 as follows:</p> <p>EI-R14 Telecommunications kiosk</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>[...].</p> <p>PER-2</p> <p><i>If not located within a road reserve, the telecommunication kiosk is setback no less than 2m from all <u>side and rear</u> site boundaries; and</i></p> <p>[...]</p>
Connexa Limited	176.53	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R15 Telecommunications or radio communication activities (not otherwise listed in rules EI-R15 to EI-R22 and not regulated by the NESTF)	<p>Supports the catch all rule with some minor amendments to allow a better 'fit' with existing telecommunications componentry.</p>	<p>Amend EI-R15 as follows:</p> <p>EI-R15 Telecommunications or radio communication activities</p> <p><u>All Zones Residential, Commercial and Mixed Use, General Industrial, Open Space and Recreation and Special Purpose Zones</u></p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1</p> <p>[...].</p> <p>PER-2</p> <p><i>A panel antenna:</i></p> <p><i>1. does not exceed a width of 0.7 <u>0.9</u> metres; and</i></p> <p><i>2. when in a road reserve, fits within an envelope of 3.5 metres in length and 0.7 <u>0.9</u> metres in width; and</i></p> <p>[...].</p>
Connexa Limited	176.54	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R16 Small cell units	<p>Supports permitting small cell units in all zones.</p>	<p>Retain as notified.</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Connexa Limited	176.55	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R17 Other network utilities (including network utility buildings and enclosed substations)	Supports the rule for new buildings/structures not otherwise addressed. However, considers the footprint should be consistent with the underlying zone provisions in the manner that setback and height in relation to boundary standards is under PER-1.	Amend EI-R17 as follows: <i>EI-R17 Other network utilities (including network utility buildings and enclosed substations)</i> Activity status: Permitted Where: PER-1 <i>The building or structure complies with the building height for network utility structures, setback, footprint or site coverage (whichever is relevant) and height in relation to boundary standards for the zone; and</i> PER-2 <i>The building or structure does not exceed a maximum footprint of:</i> <i>1. 20m² in a Residential Zone or Open Space and Recreation Zone; or</i> <i>2. 50m² in any other zone, except the General Industrial Zone, which has no maximum footprint;</i> and PER-3 <i>EI-S1 is complied with.</i>
Connexa Limited	176.56	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R19 Network utilities generating radiofrequency fields	Considers that EI-R19 aligns with the radiofrequency regulations of the NESTF.	Retain as notified.
Connexa Limited	176.57	EI - Energy and Infrastructure	Rules Section A - Rules for Energy and Infrastructure Activities (not listed in other Sections of this chapter)	EI-R21 Telecommunications lines, cabinets, poles and new antennas regulated by the NESTF that do not meet the permitted activity standards in Regulations 20, 21, 23, 27, 29, 31, 33, 35, or 37 of the NESTF and are not expressly listed as a controlled activity in Part 3 of the NESTF Regulations	Supports Rule EI-R21 that provides clarity for any NESTF regulated activities which cannot meet the permitted regulations of that document.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Connexa Limited	176.58	EI - Energy and Infrastructure	Standards	EI-S1 Maximum structure height for network utility structures of poles, antenna, towers and telecommunication poles (including the combined height of poles and antenna)	Supports the permitted pole heights in all zones, being 5m above the permitted building height limit in the relevant zone. The standard title refers to poles and telecommunication poles. The definitions in the PDP do not differentiate. Therefore, considers the term telecommunication poles should be removed from the standard title.	Amend the title of EI-S1 as follows: <i>EI-S1 Maximum structure height for network utility structures of poles, antenna, towers and telecommunications poles (including the combined height of poles and antenna)</i>
Connexa Limited	176.59	EI - Energy and Infrastructure	Standards	EI-S2 Upgrading infrastructure	Supports EI-S2 that provides directive parameters for the permitted upgrading of infrastructure. The parameters are appropriate for telecommunications infrastructure and generally align with the NESTF.	Retain as notified.
Connexa Limited	176.60	NH - Natural Hazards	Objectives	NH-O2 Regionally Significant Infrastructure	The submitter considers that Regulation 57 of the NESTF specifically disappplies District Plan natural hazard area rules from telecommunication structures which are regulated under the NESTF. Consistency between the District Plan and the NESTF is sought. The submitter requests adding words (<i>excluding telecommunication infrastructure</i>) after each mention of Regionally Significant Infrastructure in the aforementioned provisions. [see original submission for full reasons]	Amend NH-O2 as follows: <i>NH-O2 Regionally Significant Infrastructure (excluding telecommunication infrastructure)</i> <i>Regionally Significant Infrastructure (excluding telecommunication infrastructure) is located outside of high hazard areas where practicable.</i>
Connexa Limited	176.61	NH - Natural Hazards	Policies	NH-P5 Subdivision and Regionally significant Infrastructure in Liquefaction Awareness Areas	The submitter considers that Regulation 57 of the NESTF specifically disappplies District Plan natural hazard area rules from telecommunication structures which are regulated under the NESTF. Consistency between the District Plan and the NESTF is sought. The submitter requests adding words (<i>excluding telecommunication infrastructure</i>) after each mention of Regionally Significant Infrastructure in the aforementioned provisions. [see original submission for full reasons]	Amend NH-P5 as follows: <i>NH-P5 Subdivision and Regionally Significant Infrastructure (excluding telecommunication infrastructure) in Liquefaction Awareness Areas</i> <i>Require subdivision and Regionally Significant Infrastructure (excluding telecommunication infrastructure) in Liquefaction Awareness Areas to apply appropriate measures to avoid or, where avoidance is not reasonably practicable due to the functional needs of the activity, mitigate risks to people and property.</i>



Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Connexa Limited	176.62	NH - Natural Hazards	Policies	NH-P6 Subdivision and Regionally Significant Infrastructure in Earthquake Fault Awareness Areas	<p>The submitter considers that Regulation 57 of the NESTF specifically disapplies District Plan natural hazard area rules from telecommunication structures which are regulated under the NESTF. Consistency between the District Plan and the NESTF is sought.</p> <p>The submitter requests adding words (<i>excluding telecommunication infrastructure</i>) after each mention of Regionally Significant Infrastructure in the aforementioned provisions.</p> <p>[see original submission for full reasons]</p>	<p>Amend NH-P6 as follows:</p> <p><i>NH-P6 Subdivision and Regionally Significant Infrastructure (excluding telecommunication infrastructure) in Earthquake Fault Awareness Areas</i></p> <p><i>Require subdivision and Regionally Significant Infrastructure (excluding telecommunication infrastructure) in the Earthquake Fault Awareness Areas overlay to be designed or located in a way that avoids or, where avoidance is not reasonably practicable due to the functional needs of the activity, mitigates risks to people and property.</i></p>
Connexa Limited	176.63	NH - Natural Hazards	Policies	NH-P11 Regionally Significant Infrastructure in Natural Hazard Areas	<p>The submitter considers that Regulation 57 of the NESTF specifically disapplies District Plan natural hazard area rules from telecommunication structures which are regulated under the NESTF. Consistency between the District Plan and the NESTF is sought.</p> <p>The submitter requests adding words (<i>excluding telecommunication infrastructure</i>) after each mention of Regionally Significant Infrastructure in the aforementioned provisions.</p> <p>[see original submission for full reasons]</p>	<p>Amend NH-P11 as follows:</p> <p><i>NH-P11 Regionally Significant Infrastructure (excluding telecommunication infrastructure) in Natural Hazard Areas</i></p> <p><i>Only allow Regionally Significant Infrastructure (excluding telecommunication infrastructure) in Natural Hazard Areas where:</i></p> <p>[...]</p>
Connexa Limited	176.64	NH - Natural Hazards	Rules	NH-R5 Regionally Significant Infrastructure - maintenance, replacement and upgrading	<p>The submitter considers that Regulation 57 of the NESTF specifically disapplies District Plan natural hazard area rules from telecommunication structures which are regulated under the NESTF. Consistency between the District Plan and the NESTF is sought.</p> <p>The submitter requests adding words (<i>excluding telecommunication infrastructure</i>) after each mention of Regionally Significant Infrastructure in the aforementioned provisions.</p> <p>[see original submission for full reasons]</p>	<p>Amend the title of NH- R5 as follows:</p> <p><i>Regionally Significant Infrastructure (excluding telecommunication infrastructure) - maintenance, replacement and upgrading.</i></p>
Connexa Limited	176.65	NH - Natural Hazards	Rules	<p>NH-R6 Regionally Significant Infrastructure - New</p> <p>NH-R6.1 does not apply if: [...]</p>	<p>The submitter considers that Regulation 57 of the NESTF specifically disapplies District Plan natural hazard area rules from telecommunication structures which are regulated under the NESTF. Consistency between the District Plan and the NESTF is sought.</p> <p>The submitter requests adding words (<i>excluding telecommunication infrastructure</i>) after each mention of Regionally Significant Infrastructure in the aforementioned provisions.</p> <p>[see original submission for full reasons]</p>	<p>Amend NH-R6 as follows:</p> <p><i>NH-R6 Regionally Significant Infrastructure (excluding telecommunication infrastructure) New</i></p> <p>[...]</p>



Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Connexa Limited	176.66	HH - Historic Heritage	Policies	HH-P3 Benefits of active protection and use of Historic Heritage Items	Telecommunications can provide for the adaptive reuse of historic heritage items.	Retain as notified.
Connexa Limited	176.67	HH - Historic Heritage	Rules	New	<p>Considers that a new rule is needed to ensure that customer connections to heritage buildings are permitted, as opposed to falling under HH-R14 and require restricted discretionary consent.</p> <p>Please note, the wording proposed is the wording which has been agreed with Heritage New Zealand in other instances.</p>	<p>Add a new rule as follows:</p> <p><u>HH-RX Customer connections to Historic Heritage Items</u></p> <p><u>Activity Status: Permitted</u></p> <p><u>Where:</u></p> <p><u>PER-1</u></p> <p><u>Customer connections to heritage resources identified in SCHED3 - Schedule of Historic Heritage Items where the customer connection shall not be attached to a primary feature or front façade of the heritage building or structure.</u></p> <p><u>Activity status where not achieved: Controlled</u></p>
Connexa Limited	176.68	TREES - Notable Trees	Rules	TREES-R1 Minor pruning and trimming of branches	Considers the rule should be amended so the obligations established in the Telecommunications Act 2001 and the Electricity (Hazards from Trees) Regulations 2003 are met.	<p>Amend TREES-R1 as follows:</p> <p><u>TREES-R1 Minor pruning and trimming of branches less than 50mm diameter associated with the maintenance of Notable Trees</u></p> <p><u>Activity status: Permitted</u></p> <p><u>Where:</u></p> <p><u>PER-1</u></p> <p><u>It involves minor pruning and trimming of branches in the bottom third of the notable tree only and is undertaken using non-mechanical means only (handsaw, secateurs or loppers).</u></p> <p>1. The maximum branch diameter must not exceed 50mm at severance.</p> <p>2. No more than 10 per cent of live growth of the tree may be removed in any one calendar year.</p> <p>3. The works must meet best arboricultural practice.</p> <p>All trimming or alteration must retain the natural shape, form and branch habit of the tree.</p>
Connexa Limited	176.69	TREES - Notable Trees	Rules	TREES-R3 New activity and	Concerned the rule does not allow for minor excavations. Considers it is unclear if PER-1.1 allows for suitable provision	Amend TREES-R3 as follows:

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
				development within the root protection area of a notable tree	for minor works within the root protection area of notable trees consistent with the Auckland Unitary Plan.	<p>TREES-R3 New activity and development within the root protection area of a notable tree</p> <p>Activity Status:</p> <p>Permitted Where:</p> <p>PER-1</p> <p><u>1. Excavation must be undertaken by drilling machines at a depth of 1m or greater, hand-digging, air spade, or hydro vac, within the root protection area.</u></p> <p><u>2. The surface area of a single excavation must not exceed 1m².</u></p> <p><u>3. Works involving root pruning must not be on roots greater than 35mm in diameter at severance.</u></p> <p><u>5. Works must not disturb more than 10 per cent of the protected root zone.</u></p> <p><u>6. Any machines used must operate on top of paved surfaces and/or ground protection measures.</u></p> <p><u>8. Any machines used must be fitted with a straight blade bucket.</u></p> <p><u>9. All works must be undertaken under the direction of a qualified arborist.</u></p> <p>And</p> <p>The activity or development is not for any of the following:</p> <p>1. any earthworks including trenching; or</p> <p>2. establishment of new impervious surface; or</p> <p>3. new buildings; or</p> <p>4. new <u>above ground</u> structures including fences and signs (temporary and permanent).</p>
Connexa Limited	176.70	ECO - Ecosystems and Indigenous Biodiversity	Policies	ECO-P2 Appropriate indigenous vegetation clearance in significant natural areas	Supports the PDP recognises that indigenous vegetation clearance in SNAs when it is causing danger to infrastructure is appropriate.	Retain as notified.
Connexa Limited	176.71	ECO - Ecosystems and Indigenous Biodiversity	Policies	ECO-P5 Protection of Significant Natural Areas	Supports the PDP recognises that indigenous vegetation clearance in SNAs when it is causing danger to infrastructure is appropriate.	Retain as notified.
Connexa Limited	176.72	NFL - Natural Features and Landscapes	Introduction	General	Supports the introduction as it is clear that the objectives and policies of the Energy and Infrastructure Chapter are applicable to any resource consent application sought for infrastructure in an ONL, ONF or VAL.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Connexa Limited	176.73	Planning Maps	ONF overlay		Considers that roads should be excluded from the provisions relating to the ONF, ONL and VAL overlays, as they are a modified environment.	Amend the extent of the ONF overlay so it is clear that roads are not included within these areas.
Connexa Limited	176.74	Planning Maps	ONL overlay		Considers that roads should be excluded from the provisions relating to the ONF, ONL and VAL overlays, as they are a modified environment.	Amend the extent of the ONL overlay so it is clear that roads are not included within these areas.
Connexa Limited	176.75	Planning Maps	VAL overlay		Considers that roads should be excluded from provisions relating to the ONF, ONL and VAL overlays, as they are a modified environment. Considers that Rural residential areas should be excluded from Visual Amenity Landscapes as they are defined as rural areas under the NESTF	1. Amend the extent of the VAL overlay so it is clear that roads are not included within these areas. 2. Amend the extent of the VAL to exclude any areas zoned for rural residential land use.
Connexa Limited	176.76	NFL - Natural Features and Landscapes	Rules	NFL-R3 Network utilities including associated earthworks	Supports the clarity that network utilities, including earthworks, are permitted in ONF, ONL and VAL overlays. It is noted that there are no permitted standards relating to the size of network utility infrastructure maintenance or upgrading. Consequently, it is assumed that the underlying zone provisions apply.	Amend NFL-R3 as follows: <i>NFL-R3 Network utilities including associated earthwork</i> [no amendments provided]
Connexa Limited	176.77	SUB - Subdivision	Objectives	SUB-O2 Infrastructure	Supports the objective that requires the integration of subdivision and infrastructure.	Retain as notified.
Connexa Limited	176.78	SUB - Subdivision	Objectives	New	Considers that reverse sensitivity should be a consideration for all subdivisions. Considers an objective providing direction on this matter is warranted and supports SUB-5 as notified.	Amend SUB - Subdivision Chapter to add a new objective, as follows: <i>SUB-O[X] Reverse sensitivity.</i> <i>Reverse sensitivity effects of subdivision on existing lawfully established activities (including network utilities) are avoided where practicable or mitigated where avoidance is not practicable.</i>
Connexa Limited	176.79	SUB - Subdivision	Policies	SUB-P5 Reverse Sensitivity	Supports the policy which provides direction on reverse sensitivity.	Retain as notified.
Connexa Limited	176.80	SUB - Subdivision	Policies	SUB-P6 Infrastructure	Supports the policy requiring the integration of subdivision and infrastructure.	Retain as notified.
Connexa Limited	176.81	SUB - Subdivision	Rules	SUB-R2 Subdivision that creates new allotments solely for the purpose of network utilities, the national grid or roads	Supports the Controlled Activity status for new network utility allotments.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Connexa Limited	176.82	SUB - Subdivision	Standards	SUB-S5 Electricity supply and telecommunications	Considers all new subdivisions, regardless of zoning, should be required to provide a telecommunications connection. All new subdivisions within the Rural Lifestyle and urban zones should require a connection to an open access fiber network.	Amend SUB-S5 as follows: SUB-S5 Electricity supply and telecommunications All zones except General Rural Zone <i>All allotments, other than allotments for access, roads, utilities or reserves, must be provided with connections at the boundary of the net area of the allotment to an electricity supply and telecommunication service system networks, unless evidence is provided that a suitable alternative supply can be provided, and a consent notice is proposed alerting future purchasers.</i> <i><u>In all zones except General Rural, the connection to a telecommunication service must be through an open access fibre network. In the general rural zone the applicant shall provide written confirmation from a telecommunication network operator confirming that a telecommunications connection (fibre, mobile or wireless including satellite) can be provided to all new allotments and describing how this can be achieved.</u></i> <i><u>In all zones, at the time of subdivision, sufficient land for telecommunications, and any associated ancillary services must be set aside. For a subdivision that creates more than 15 lots, consultation with telecommunications network utility operators will be required.</u></i> <i><u>All necessary easements for the protection of telecommunications network utility services must be duly granted and reserved.</u></i> <i>This standard does not apply to allotments for a utility, road, reserve or for access purposes.</i>
Connexa Limited	176.83	CE - Coastal Environment	Rules	CE-R5 Earthworks, excluding: earthworks for natural hazard mitigation works; and any land disturbance	Supports that earthworks in the Coastal Environment for the purpose of installation of underground network utilities and ancillary structure and an allowance for above ground structures is permitted.	Retain as notified.
Connexa Limited	176.84	CE - Coastal Environment	Rules	CE-R7 Regionally Significant Infrastructure - maintenance and upgrade	Supports that maintenance and upgrade of regionally significant infrastructure in the coastal environment is permitted.	Retain as notified.
Connexa Limited	176.85	CE - Coastal Environment	Rules	CE-R8 Regionally Significant Infrastructure - New	Supports that new regionally significant infrastructure in the coastal environment (outside of the high natural character area overlay) is permitted.	Retain as notified.
Connexa Limited	176.86	EW - Earthworks	Introduction		Supports the introduction which exempts earthworks associated with infrastructure from the rules within this chapter.	Retain as notified.
Connexa Limited	176.87	NOISE - Noise	Standards	Table 24 Noise Performance Standards	Supports the permitted noise standards in Table 24 generally align with the NESTF.	Retain NOISE - Noise Table 24 as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Connexa Limited	176.88	SIGN - Signs	Rules	SIGN-R4 Any signs not otherwise address in the Rules section of this chapter	Supports that Sign R4 clearly permits signs associated with network utilities.	Retain as notified.
Alastair Joseph Rooney	177.1	Planning Maps	Rezone		Opposes the Sport and Active Recreation Zone in relation to land at 0 Domain Avenue and part of 32 Milford-Clandeboye Road. Notes grazing (to control grass/weeds) is a permitted activity under the operative District Plan but needs a resource consent in the SARZ in the PDP. Considers the provisions of SARZ do not contemplate management of private land.	<p>1. Rezone 0 Domain Avenue and a portion of 32 Milford-Clandeboye Road as General Rural Zone as shown below: 0 Domain Ave, Temuka</p>  <p>32 Milford - Clandeboye Road</p>  <p>AND</p> <p>2. If the rezone request is not accepted, amend SARZ as detailed in the 177.2.</p>
Alastair Joseph Rooney	177.2	SARZ - Sport and Active Recreation Zone	General	General	Opposes the Sport and Active Recreation Zone in relation to land at 0 Domain Avenue and part of 32 Milford-Clandeboye Road. Notes grazing (to control grass/weeds) is a permitted activity under the operative District Plan but needs a resource consent in the SARZ in the PDP. Considers the provisions of SARZ do not contemplate management of private land.	<p>If the rezone request in 177.1 is not accepted, the following relief are sought, in order of preference:</p> <ol style="list-style-type: none"> 1. Enable the grazing of animals within the Sport and Active Recreation Zone. 2. Enable grazing of animals within the Sport and Active Recreation Zone within 0 Domain Avenue and 32 Milford -Clandeboye Road. 3. Any alternative relief that would address submitters concerns.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alastair Joseph Rooney	177.3	GRUZ - General Rural Zone	General	General	<p>Opposes any objectives, policies, rules, standards and schedules of the GRUZ in relation to the overlay relating to the Properties because:</p> <ul style="list-style-type: none"> Intensively farmed stock is not expressly authorised within any zone and should be provided for in this zone; Intensively farmed stock should be protected under GRUZ-O3; 	<ol style="list-style-type: none"> Amend GRUZ-R1 to permit primary production, intensive primary production and intensively farmed stock Amend GRUZ-O1 to provide for primary production, intensive primary production and intensively farmed stock Any alternative relief that would address submitters concerns.
					<ul style="list-style-type: none"> Intensively farmed stock should be provided as a permitted activity under GRUZ-R1. 	
Alastair Joseph Rooney	177.4	Planning Maps	Light Sensitive Area Overlay		<p>Opposes the inclusion of the submitter's properties in the overlay because:</p> <ul style="list-style-type: none"> the extent of the layer was based on overlays (where some were extensive in area), rather than ecological assessment. The overlay does not account for the critical need for light for health and safety associated with activities within the overlay. The rules in this chapter do not allow critical health and safety lighting past 10pm. <p>[Refer to original submission for full reason].</p>	<p>Delete the Light Sensitive Area Overlay from land located at 32 and 48 Milford-Clandeboye Road, as shown below:</p> <p>32 Milford-Clandeboye Road</p>  <p>48 Milford-Clandeboye Road</p>  <p>OR</p> <ol style="list-style-type: none"> reduce the extent of the overlay. <p>OR</p> <ol style="list-style-type: none"> any alternative relief to address these concerns.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alastair Joseph Rooney	177.5	LIGHT - Light	Policies	LIGHT-P1 Appropriate artificial outdoor lighting	Opposes LIGHT-P1 as it should exempt artificial lighting required for health and safety reasons, ancillary activities to permanent activities.	<ol style="list-style-type: none"> 1. Amend LIGHT-P1 to ensure that artificial outdoor lighting is not restricted when it is necessary for health and safety. 2. Any alternative relief that would address concerns.
Alastair Joseph Rooney	177.6	LIGHT - Light	General	General	Opposes Light Sensitive Areas being delineated by overlays, rather than on ecological assessment. The Wāhi tapu, Wāhi taoka and Wai taoka Overlays are expansive, particularly Wāhi taoka SASM-4B, and encompasses areas where the control of light is unnecessary to character and qualities of the surrounding area. Outdoor lighting is a broad definition which is unclear whether this applies to fixed or unfixed lighting.	<p>Amend the PDP (including the LIGHT Chapter, the Planning Maps and definitions) as follows, in order of preference:</p> <ol style="list-style-type: none"> 1. Light sensitive areas to be determined based on ecological evidence, and limited accordingly. 2. Standards be developed to determine what constitutes a light sensitive area.
						<ol style="list-style-type: none"> 3. Clarification of the definition of Outdoor Lighting to identify whether such lighting is fixed and/or unfixed. 4. Any alternative relief that would address the submitter's concerns.
Alastair Joseph Rooney	177.7	LIGHT - Light	Rules	LIGHT-R2 Outdoor artificial lighting for health and safety	<p>Opposes LIGHT-R2 PER-2 as it does not account for permanent activities or existing uses that require artificial lighting in the ordinary course of business to protect the health and safety of stock/plant/personnel and is at odds with LIGHT-P1.</p> <p>Additionally, PER-3 is at odds with policy LIGHT-P3.</p> <p>[Refer to original submission for full reason].</p>	<p>Amend LIGHT-R2 - Outdoor artificial lighting for health and safety to:</p> <ol style="list-style-type: none"> 1. Provide for outdoor artificial light for health and safety as a permitted activity for an ancillary activity to a permanent activity that occurs on site; 2. Amend PER-3 to clearly be not applicable to lighting required for health and safety (including for ancillary activities to permanent activities occurring at the site). 3. Any alternative relief that would address the submitters concerns and enable farming operations to continue with necessary lighting.
Alastair Joseph Rooney	177.8	LIGHT - Light	Standards	General	<p>Oppose Table 22 and 23 and Figure 18 together with any other rules and standards relating to lighting standards, illuminance levels, increment and acceptable/unacceptable lighting because the limitations in these tables and figures are not practical, in particular:</p> <ul style="list-style-type: none"> • Opposes Table 22 which limits illuminance levels to times between 7am-10pm and prescribes low lux levels. These times and lux levels cannot be achieved when undertaking ancillary activities to permanent activities such as farming, where emergency clearance of stock may be required past 10pm. • Opposes Figure 18 as the examples of acceptable fixtures are limited, and must all be fully shielded, this is not practicable for farming operations, where flood lights or other exposed lighting might be required to safely operate the permanent activity. 	<ol style="list-style-type: none"> 1. Remove the illuminance time restrictions in Table 22. 2. Remove the illuminance time restrictions in Table 22 insofar as they relate to matters of health and safety (including ancillary activities to permanent activities that occur on site) 3. Remove the limits on acceptable illuminance levels, increment, and acceptable/unacceptable lighting for matters of health and safety for an ancillary activity of a permanent activity that occurs on site. 4. Any alternative relief that would address submitter's concerns, and enable farming operations to continue with necessary lighting.


Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alastair Joseph Rooney	177.9	Definitions	Definitions	Urban Area	Considers that the boundaries of a “town with a population of 1,000 or more” is unclear. 0 Domain Avenue, 48 Milford-Clandeboyne Road, and 23 Milford-Clandeboyne Road are within Temuka, but are not situated within Temuka proper and it is unclear which rules will apply to the properties.	Amend the definition of Urban Area to clarify the boundaries of urban areas.
Alastair Joseph Rooney	177.10	Planning Maps	SASM Overlay		Opposes the extent of the overlays over the Properties. The SASM boundaries are expansive and it is unclear how these have been determined. These overlays contain some very restrictive rules, and it is not appropriate to apply these equally across expansive areas, which have their own natural characteristics and existing uses.	<ol style="list-style-type: none"> 1. Delete the SASM Overlays off land located at 0 Domain Ave, Temuka; 48 Milford-Clandeboyne Road, Temuka and 32 Milford-Clandeboyne Road, Temuka; 2. Reduce the extent of the SASM Overlays on 0 Domain Ave, Temuka; 48 Milford-Clandeboyne Road, Temuka and 32 Milford-Clandeboyne Road, Temuka 3. Delete SASM-4B from 0 Domain Ave, Temuka; 48 Milford-Clandeboyne Road, Temuka and 32 Milford-Clandeboyne Road, Temuka; 4. Reduce the extent of SASM-4B from the properties; 5. Any alternative relief to address these concerns.
Alastair Joseph Rooney	177.11	SASM - Sites and Areas of Significance to Māori	Policies	General	The submitter accepts the policies of this chapter focus on the protection of SASM. However, the submitter considers policies should contemplate health and safety, and existing use of land subject to SASMs and the protection of those activities.	<ol style="list-style-type: none"> 1. Amend SASM-P4 Cultural Access to focus on the grant of safe access and to recognise the impact of access on existing rural activities. 2. Amend policies to recognise that an adverse effect of the activities, do not negatively impact existing uses of the affected land. 3. Any alternative relief that would address the submitter’s concerns.
Alastair Joseph Rooney	177.12	SASM - Sites and Areas of Significance to Māori	Policies	SASM-P8 Protection of wāhi taoka, wāhi tapu, wai taoka and wai tapu sites and areas	Oppose SASM - P8 as this policy does not recognise existing uses of land. ‘Functional needs associated with an activity’ may not enable an existing activity to be efficiently carried out. Activities within these overlays can be effectively managed with matters of control or discretion.	<ol style="list-style-type: none"> 1. Amend SASM-P8 to recognise existing rural use of sites within the SASM overlays. 2. Amend SASM-P8 as follows: SASM-P8 Protection of wāhi taoka, wāhi tapu, wai taoka and wai tapu sites and areas <i>Where an activity is proposed within any of the wāhi taoka sites, wāhi tapu sites, wai taoka areas and wai tapu areas listed in SCHED6 - Schedule of Sites and Areas of Significance to Kāti Huirapa, ensure that:</i> [...] <i>3. any adverse effects on identified values are avoided unless it can be demonstrated that:</i> <ol style="list-style-type: none"> a. due to the are for the functional needs of the activity, it is not possible to avoid all adverse effects; and b. any residual effects that cannot be practicably avoided are mitigated, as far as possible, in a way that protects, maintains or enhances the overall values of the site or area; and c. where any historical loss of values can be remediated; 3. Any alternative relief that would address the submitter’s concerns.

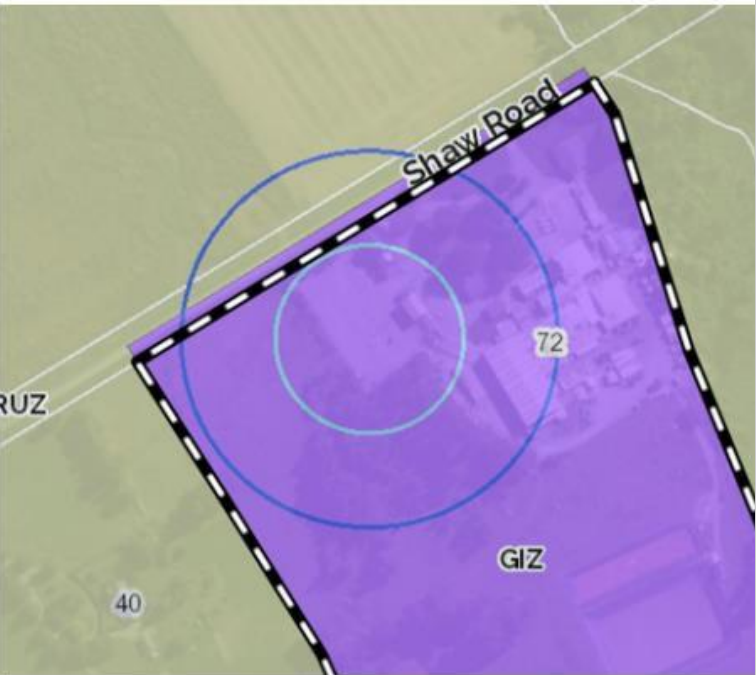
Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Alastair Joseph Rooney	177.13	SASM - Sites and Areas of Significance to Māori	Rules	SASM-R6 Intensively farmed stock	Opposes SASM-R6 as Intensively farmed stock can be adequately managed through matters of control and discretion and a more appropriate process for approval should be provided (i.e., not deemed a non-complying activity within wāhi taoka, wāhi tapu, and wai tapu overlays with objectives and policies that seek avoidance and protection over continued use). [See original submission for full reason].	<ol style="list-style-type: none"> 1. Amend SASM-R6 Intensively farmed stock by deleting SASM-R6.2. 2. Amend the activity status from Non-complying to Controlled. 3. Any alternative relief that would address the submitters concerns.
Alastair Joseph Rooney	177.14	ECO - Ecosystems and Indigenous Biodiversity	General	General	The submitter, notes there is no ECO-SCHED2 to the PDP, and it is unclear whether this is to be read together with SCHED7 - Schedule of Significant Natural Areas.	Amend ECO - Ecosystems and Indigenous Biodiversity chapter so that ECO-SCHED2 is made available or reference corrected to SCHED7 if included in error.
Alastair Joseph Rooney	177.15	NH - Natural Hazards	General	General and NH-S2 Volume of earthworks.	Opposes, together with any objectives, policies, rules, standards and schedules in respect of the Flood Assessment Area Overlay relating to the submitter's properties. The Flood Assessment Area Overlay covers the submitter's properties which are both used for primary production purposes. Farming activities, and natural hazard mitigation activities (such as maintenance of stopbanks) can involve significantly more than 2,000m ² in earthworks.	<ol style="list-style-type: none"> 1. Delete; amend; or reduce the extent of; the Flood Assessment Areas overlay off land located at 0 Domain Avenue, Temuka; 48 Milford Clandeboye Road and 32 Milford Clandeboye Road; 2. Amend NH-S2 to increase the permitted earthworks volumes in the Rural Zones within the Flood Assessment Areas overlay per year under NH-S2.2. from 2,000m² to 2,500m² or more; 3. Introduce a rule that earthwork limits within this overlay, only apply in respect to activities that increase flood exposure; 4. Reduce the extent of the overlay on these properties; 5. any alternative relief that would address the submitter's concerns.
Alastair Joseph Rooney	177.16				Submission point deleted due to duplication, refer submission point 177.15.	Refer submission point 177.15
Alastair Joseph Rooney	177.17				Submission point deleted due to duplication, refer submission point 177.15.	Refer submission point 177.15

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Rural Contractors New Zealand	178.1	Definitions	Definitions	New	Considers that a rural contractor depot would currently be captured under the definition of 'rural industry', resulting in a restricted discretionary activity resource consent. A permitted activity is considered more appropriate for small-scale rural contractor depots. The definition is proposed to support the associated GRUZ rules.	Add a new definition for Rural contractor depot as follows: <u>Rural contractor depot</u> <u>means 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> [See submission on GRUZ for relief sought on associated rules]
Rural Contractors New Zealand	178.2	Definitions	Definitions	Rural Industry	Supports the definition as appropriate to align with the National Planning Standards 2019.	Retain as notified.
Rural Contractors New Zealand	178.3	SD - Strategic Direction	Objectives	SD-O9 Rural Areas	Considers that Objective SD-O9 should better reflect the policy direction for the General Rural Zone which enables activities that support and protect primary production activities (e.g. rural industry).	Amend SD-O9 Rural Areas as follows: A range of primarily Primary production activities, rural industry and other supporting activities are enabled in the rural environment to enable the ongoing use of land for primary production for present and future generations, while: [...] iii. managing the adverse effects of new sensitive activities on primary production activities, rural industry and other supporting activities; [...]
Rural Contractors New Zealand	178.4	GRUZ - General Rural Zone	Objectives	GRUZ-O1 Purpose of the General Rural Zone	Supports the objective as it recognises the importance of providing for activities (such as rural industry) that support primary production and require a rural location.	Retain as notified.
Rural Contractors New Zealand	178.5	GRUZ - General Rural Zone	Objectives	GRUZ-O2 Character and qualities of the General Rural Zone	Supports the objective as it recognises the characteristics and variable nature of the General Rural Zone working environment.	Retain as notified.
Rural Contractors New Zealand	178.6	GRUZ - General Rural Zone	Objectives	GRUZ-O3 Protecting primary production	Supports the policy direction to protect the land resource from activities that have no functional or operational need to locate in the General Rural Zone.	Retain as notified.

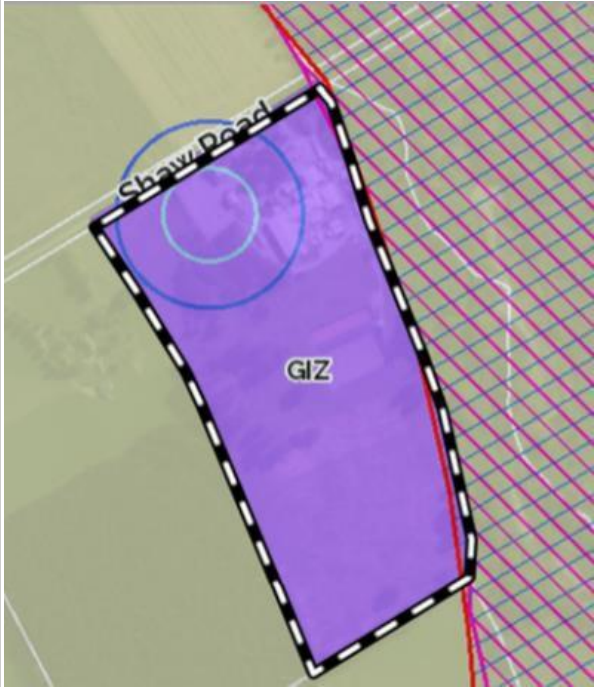
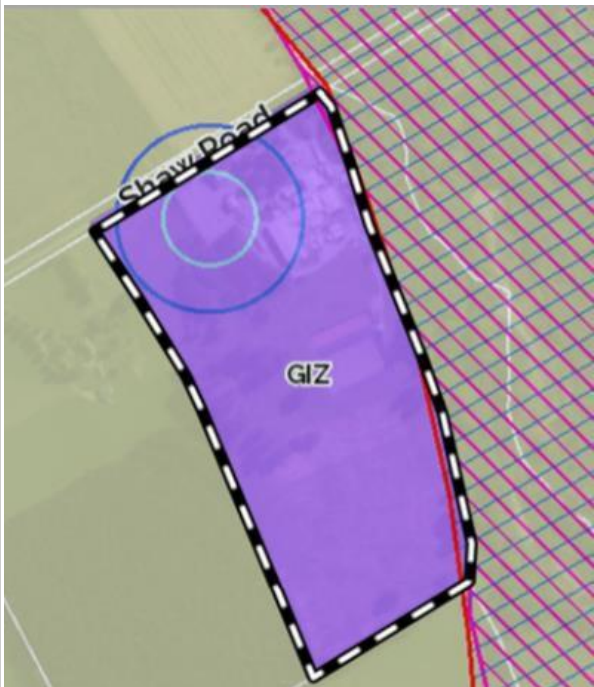
Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Rural Contractors New Zealand	178.7	GRUZ - General Rural Zone	Policies	GRUZ-P5 Protecting primary production	Considers GRUZ-P5 needs to be broadened to ensure that rural and industry and other activities that support primary production are also protected from potential reverse sensitivity effects arising from the establishment of nearby sensitive activities.	Amend GRUZ-P5 as follows: <u>GRUZ-P5 Protecting primary production, rural industry and other supporting activities</u> Manage sensitive activities in the zone to ensure: <i>1. they are located to avoid adverse effects on primary production, <u>rural industry and other supporting activities</u>; or</i> <i>2. if avoidance is not possible, the sensitive activity includes mitigation measures so that there is minimal potential for adverse effects on the sensitive activity from primary production, <u>rural industry and other supporting activities</u>.</i>
Rural Contractors New Zealand	178.8	GRUZ - General Rural Zone	Policies	GRUZ-P7 Industrial activities, rural industries and other activities	Supports that Policy GRUZ-P7 clearly provides for activities (such as rural industry) that support primary production and require a rural location.	Retain as notified.
Rural Contractors New Zealand	178.9	GRUZ - General Rural Zone	Rules	New	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. A new permitted activity rule is considered more appropriate for small-scale rural contractor depots. A consequential amendment is required to Rule GRUZ-R21 so that it does not apply to rural contractor depots, if this rule is accepted.	Insert a new rule into the GRUZ - General Rural Zone Chapter as follows: <u>GRUZ-RXX Rural Contractor Depot Activity</u> <u>Status Permitted</u> <u>Where:</u> <u>PER-1</u> <u>The maximum number of staff is 7 (other than persons living on the site).</u> <u>PER-2</u> <u>The rural contractor depot (including associated vehicle access, parking and manoeuvring areas) is set back at least 50m from any existing sensitive activity.</u> <u>Note: any associated building and structure must be constructed in accordance with GRUZ- R13.</u> <u>Activity status where compliance not achieved with PER-1 to PER-2: Restricted Discretionary</u> <u>Matters of discretion are restricted to:</u> <i><u>1. the suitability of the location, site design and layout; and</u></i> <i><u>2. the intensity and scale of the activity; and</u></i> <i><u>3. the extent of adverse effects on existing or permitted activities; and</u></i> <i><u>4. the extent of adverse effects on the safe and efficient operation of the road network, and suitability of onsite loading, manoeuvring and access; and</u></i>

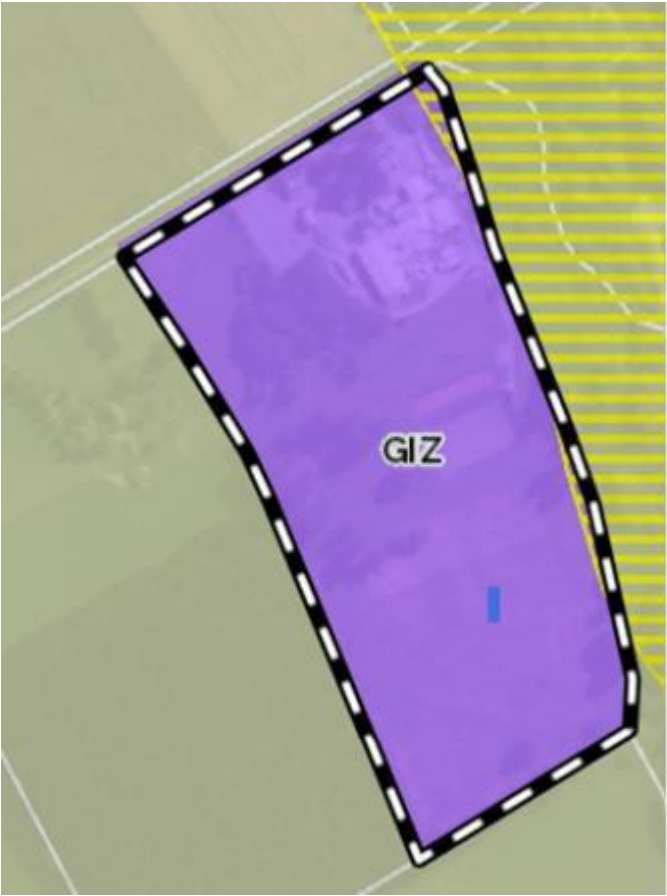
Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
						<p><u>5. the provision of infrastructure to service the activity; and</u></p> <p><u>6. measures to avoid, mitigate or remedy adverse effects.</u></p> <p>[See submission 178.10 on GRUZ-R21 for consequential changes]</p>
Rural Contractors New Zealand	178.10	GRUZ - General Rural Zone	Rules	GRUZ-R21 Rural industry	As outlined in submission point 178.9, the submitter seeks a new permitted activity rule to enable rural contractor depots. Accordingly, a consequential amendment is required in relation to Rule GRUZ-R21	<p>Amend GRUZ-R21 Rural industry as follows:</p> <p>GRUZ-R21 Rural industry (excluding a rural contractor depot) [...]</p> <p>[This is a consequential amendment to the relief sought in 178.9]</p>
Rural Contractors New Zealand	178.11	GRUZ - General Rural Zone	Standards	GRUZ-S4 Setbacks for sensitive activities	Considers that it is appropriate to restrict the siting of sensitive activities relative to primary production activities. However, a consequential amendment is required to account for the new rural contractor definition and rule.	<p>Amend GRUZ-S4 Setbacks for sensitive activities as follows:</p> <p>GRUZ-S4 Setbacks for sensitive activities</p> <p>[...]</p> <p>3. <u>No new building for a sensitive activity may be erected within 20m of an existing shelter belt;</u></p> <p>4. <u>No new building for a sensitive activity may be erected within 50m of a rural contractor depot (including associated vehicle access, parking and manoeuvring areas).</u></p>
Barkers Fruit Processors Limited	179.1	Planning Maps	Wai Taoka and Wai Taoka Lines overlays	SASM20 Te Umu Kaha (Temuka), Hae hae Te Moana and Waihi Rivers	The Wai Taoka and Wai Taoka Lines (SASM20) are located immediately adjacent to part of the eastern boundary of the submitters site. It is understood that these overlays follow the Hae Hae Te Moana River. It is considered practicable for plan implementation that the overlays to follow the site boundary.	Amend the Wai Taoka and Wai Taoka Lines (SASM20) to reflect the site boundary of 72 Shaw Road, Geraldine.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
					 <p>The image is an aerial photograph with a purple shaded polygon labeled 'GIZ' and a green dotted area labeled 'SASM-20'. The purple area is irregularly shaped and outlined with a thick black dashed border. The green dotted area is to the right of the purple area. The background shows a mix of green and brownish terrain, possibly representing different land uses or vegetation types.</p>	

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Barkers Fruit Processors Limited	179.2	Planning Maps	Drinking Water Protection Area overlay		<p>The submitter considers the additional bore should be shown to trigger consideration for nearby land uses. The bore classifications to be updated to Community Drinking Water Supply, if considered necessary.</p> 	<p>1. Add a new Drinking Water Protection Area for the additional bore at 72 Shaw Road, Geraldine. (shown on the aerial photo below and attached to original submission)</p> <p>AND</p> <p>2. Amend the classification of the Drinking Water Protection Areas to Community Drinking Water Supplies if this is deemed necessary.</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
						

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Barkers Fruit Processors Limited	179.3	Planning Maps	Flood Assessment Area overlay		<p>The submitter considers it would be practicable for plan implementation purposes, that the for the Flood Assessment Area overlay to follow the site boundary.</p> 	<p>Amend the Flood Assessment Area overlay to reflect the site boundary of 72 Shaw Road, Geraldine (see map attached on original submission).</p>
Barkers Fruit Processors Limited	179.4	Planning Maps	Liquefaction Awareness Areas overlay		<p>The submitter considers it would be practicable for plan implementation purposes, that the for the Liquefaction Area overlay to follow the site boundary.</p> 	<p>Amend the Liquefaction Area overlay to reflect the site boundary of 72 Shaw Road, Geraldine.</p>

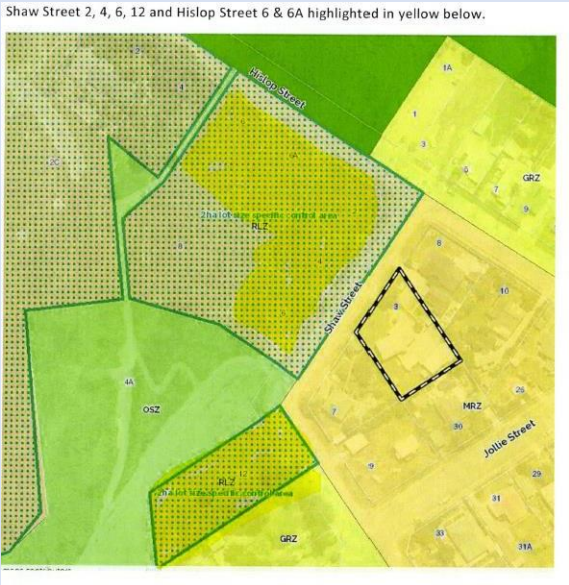
Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Barkers Fruit Processors Limited	179.5	Planning Maps	Light Sensitive Area overlay		The submitter considers it would be practicable for plan implementation purposes, that the for the Light Sensitive Area overlay to follow the site boundary.	Amend the Light Sensitive Area overlay to reflect the site boundary of 72 Shaw Road, Geraldine.
						
Barkers Fruit Processors Limited	179.6	SD - Strategic Direction	Objectives	SD-O6 Business Areas and Activities	Objective SD-O6 is considered appropriate.	Retain as notified.
Barkers Fruit Processors Limited	179.7	GIZ - General Industrial Zone	Objectives	GIZ-O1 The purpose of the General Industrial Zone	Objective GIZ-O1 is considered appropriate.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Barkers Fruit Processors Limited	179.8	GIZ - General Industrial Zone	Objectives	GIZ-O2 Character and qualities of the General Industrial Zone	Considers that the term 'do not compromise' is a too onerous threshold in the GIZ, and instead 'maintain' is more appropriate and would better align with Objective GIZ-O4.3.	Amend GIZ-O2 Character and qualities of the General Industrial Zone as follows: <i>The character and qualities of the General Industrial Zone comprise:</i> [...] 7. buildings and activities that do not compromise <u>maintain</u> the amenity of adjoining Residential and Open Space and Recreation Zones; and [...]
Barkers Fruit Processors Limited	179.9	GIZ - General Industrial Zone	Objectives	GIZ-O3 Use and development in the General Industrial Zone	The objective is considered appropriate.	Retain as notified
Barkers Fruit Processors Limited	179.10	GIZ - General Industrial Zone	Policies	GIZ-P1 Industrial activities	The policy is considered appropriate.	Retain as notified.
Barkers Fruit Processors Limited	179.11	GIZ - General Industrial Zone	Policies	GIZ-P3 Streetscape and amenity values	The policy is considered appropriate.	Retain as notified.
Barkers Fruit Processors Limited	179.12	GIZ - General Industrial Zone	Policies	GIZ-P6 Other activities	The policy is considered appropriate.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Barkers Fruit Processors Limited	179.13	GIZ - General Industrial Zone	Rules	GIZ-R1 Industrial activity Trade supplier Laboratories Service stations Motor garage Emergency services facilities Veterinary clinics Excluding any industrial ancillary activity and offensive trades	The submitter notes that GIZ-R1 permits industrial activity but excludes ancillary activities. The definition of “Industrial Activity” in the PDTP is defined to include “any ancillary activity”. Accordingly, the rule is at odds with the definition and this creates confusion for plan users. Considers that, PER-2 is blunt and is worded in a way that captures all activities which require a trade waste connection, even if the site has an existing available connection.	Amend GIZ-R1 Industrial activity , [...] as follows: GIZ-R1 Industrial activity, Trade supplier, Laboratories, Service stations, Motor garage, Emergency services facilities, Veterinary clinics Excluding any industrial ancillary activity and offensive trades [...] Activity status: Permitted Where: [...] PER-1 <i>The activity and its buildings and structures (excluding fences) are located more than 50 metres from any Residential Zones or Rural Lifestyle Zone; and</i> PER-2 <i>If the activity does not requires a new industrial and trade waste connection <u>and a trade waste connection is available</u>; and</i> PER-3 <i>The activity and its buildings and structures, complies with all the Standards of this chapter; <u>and</u></i> PER-4 <i><u>Any ancillary activity does not include a residential activity; and</u></i> PER-5 <i><u>Any ancillary activity(s):</u></i> <i><u>1. are located on the same site of the primary industrial activity; and</u></i> <i><u>2. has a maximum combined gross floor area of 15% of the primary industrial buildings on the site.</u></i>
Barkers Fruit Processors Limited	179.14	GIZ - General Industrial Zone	Rules	GIZ-R2 Industrial ancillary activities	Considers that combining Rule GIZ-R1 with Rule GIZ-R2 will streamline the rule framework.	Delete GIZ-R2 Industrial ancillary activities .
Barkers Fruit Processors Limited	179.15	GIZ - General Industrial Zone	Standards	GIZ-S1 Height in relation to boundary	Standard GIZ-S1 is considered appropriate.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Barkers Fruit Processors Limited	179.16	GIZ - General Industrial Zone	Standards	GIZ-S2 Maximum height of buildings and structures	Standard GIZ-S2 is considered appropriate.	Retain as notified.
Barkers Fruit Processors Limited	179.17	GIZ - General Industrial Zone	Standards	GIZ-S3 Setbacks of buildings and structures excluding fences	Standard GIZ-S3 requires any building or structure be setback 5m from a road boundary whereas GIZ-S6 requires a 3-metre-wide landscaping strip along the road boundary. A 3-metre setback (comprising the required landscaping) is considered an appropriate width to establish the species set out in GIZ-S6 and provide the screening and amenity anticipated.	Amend GIZ-S3 Setbacks of buildings and structures excluding fences as follows: 1. General Industrial Zone 1. Any building or structure must be setback a minimum of 53m from any road boundary; and 2. Any building or structures must be setback a minimum of 3m from any boundary with a Residential Zone, Rural Zone or Open Space and Recreation Zone.
Barkers Fruit Processors Limited	179.18	GIZ - General Industrial Zone	Standards	GIZ-S6 Landscaping and bund(s)	Standard GIZ-S6 is considered appropriate, however it should provide for planting to occur in the following planting season.	Amend GIZ-S6.4 Landscaping and bund(s) as follows: 1. General Industrial Zone [...]; 4. The landscaping strip must be permanently maintained and if any plants die or become diseased, they must be replaced in the next planting season immediately .
Barkers Fruit Processors Limited	179.19	GRUZ - General Rural Zone	Standards	GRUZ-S4 Setbacks for sensitive activities	Considers a setback for sensitive activities, or buildings for sensitive activities, is an appropriate tool to manage reverse sensitivity effects which may arise from the site.	Amend GRUZ-S4 Setbacks for sensitive activities as follows: [...] 4. No new sensitive activity shall be established, and no new building for a sensitive activity shall be erected within 100m from the boundary of the General Industrial Zone at 72 Shaw Road (Lot 3 DP58430).
Barkers Fruit Processors Limited	179.20	LIGHT - Light	Rules	LIGHT-R1 Artificial outdoor lighting outside light sensitive areas	Considers that for health and safety, and site security reasons, it is too restrictive for the site operations to meet the Light Sensitive Area standards as at the boundary of the Light Sensitive Area.	1. Amend LIGHT-R1 Artificial outdoor lighting outside light sensitive areas as follows: 1. All zones other than Port Zone, and the General Industrial Zone at 72 Shaw Road, Geraldine (Lot 3 DP58403), outside Light Sensitive Areas. OR 2. Amend rules to exclude 72 Shaw Road, Geraldine (Lot 3 DP58403) from compliance with the Light Sensitive Area requirements.
Barkers Fruit Processors Limited	179.21	LIGHT - Light	Rules	LIGHT-R2 Outdoor artificial lighting for health and safety	Considers that for health and safety, and site security reasons, it is too restrictive for the site operations to meet the Light Sensitive Area standards at the boundary of the Light Sensitive Area.	1. Amend LIGHT-R2 Outdoor artificial lighting for health and safety as follows: 2. Port Zone, and the General Industrial Zone at 72 Shaw Road, Geraldine (Lot 3 DP58403) outside Light Sensitive Areas. OR 2. Amend rules to exclude 72 Shaw Road, Geraldine (Lot 3 DP58403) from compliance with the Light Sensitive Area requirements.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary									
Barkers Fruit Processors Limited	179.22	LIGHT - Light	Standards	LIGHT-S1 General lighting standards	Considers that for health and safety, and site security reasons, it is too restrictive for the site operations to meet the Light Sensitive Area standards as at the boundary of the Light Sensitive Area.	<p>1. Amend LIGHT-S1 General lighting standards as follows: All zones (excluding Port Zone and the General Industrial Zone at 72 Shaw Road, Geraldine (Lot 3 DP58403)).</p> <p>OR</p> <p>2. Amend rules to exclude 72 Shaw Road, Geraldine (Lot 3 DP58403) from compliance with the Light Sensitive Area requirements.</p>									
Barkers Fruit Processors Limited	179.23	NOISE - Noise	Standards	Table 24 - Noise performance standards	Noise limit controls are considered appropriate along the zone boundary with sensitive zones or at the notional boundary of noise sensitive activities in other zones. However, the principle of an in-zone noise limit in the GIZ is opposed.	<p>Amend reference to the General Industrial Zone within Table 24.3 as follows:</p> <table border="1"> <thead> <tr> <th>Receiving zone and assessment location</th> <th>Receiving zone and assessment location</th> <th>Receiving zone and assessment location</th> </tr> </thead> <tbody> <tr> <td>3.</td> <td>7.00am - 10.00pm</td> <td>65 dB L_{Aeq} (15 min)</td> </tr> <tr> <td> <p>Within any part of a site in the following zones:</p> <p>a. Large Format Retail Zone</p> <p>b. Town Centre Zone</p> <p>c. City Centre Zone</p> <p>d. General Industrial Zone, excluding those sites located to the east of the Main South Railway Line and forming part of, or adjoining the Port of Timaru.</p> </td> <td>10.00pm - 7.00am</td> <td>65 dB L_{Aeq} (15 min) 75 dB L_{AFmax}</td> </tr> </tbody> </table>	Receiving zone and assessment location	Receiving zone and assessment location	Receiving zone and assessment location	3.	7.00am - 10.00pm	65 dB L _{Aeq} (15 min)	<p>Within any part of a site in the following zones:</p> <p>a. Large Format Retail Zone</p> <p>b. Town Centre Zone</p> <p>c. City Centre Zone</p> <p>d. General Industrial Zone, excluding those sites located to the east of the Main South Railway Line and forming part of, or adjoining the Port of Timaru.</p>	10.00pm - 7.00am	65 dB L _{Aeq} (15 min) 75 dB L _{AFmax}
Receiving zone and assessment location	Receiving zone and assessment location	Receiving zone and assessment location													
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Barkers Fruit Processors Limited	179.24	RELO - Relocated Buildings and Shipping Containers	Policies	RELO-P1 Relocated buildings and shipping containers in General Industrial Zone	The policy is considered appropriate.	Retain as notified.									
Barkers Fruit Processors Limited	179.25	RELO - Relocated Buildings and Shipping Containers	Rules	RELO-R1 Placement of a relocated building	The rule RELO-R1 is considered appropriate.	Retain as notified.									
Barkers Fruit Processors Limited	179.26	RELO - Relocated Buildings and Shipping Containers	Rules	RELO-R2 Placement of a shipping container	The rule is considered appropriate.	Retain as notified.									

Submitter	Sub No.	Section/Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Malpati Regenvanu	180.1	Planning Maps	Rezone		<p>Considers that properties on Shaw and Hislop Streets, Geraldine are part of the urban precinct of Geraldine, are small scale and have all infrastructural services connected, with an urban amenity including streetlights, kerb and channel etc. Along Shaw Street these RLZ sites are across the road from the Medium Density Zone, MRZ. The MRZ provides for higher density settlement in town centres. A better graduation of zoning would be achieved to zone the lots subject to this submission as General Residential Zone, GRZ. They are not rural residential properties.</p> <p>Considers that when RLZ is applied to the properties at 2, 4, 6 and 12 Shaw Street and 6 and 6A Hislop Street, none of the relevant zone standards can be met such as setbacks, site coverage and minimum lot size. The lots are too small to be included in this Zone.</p> <p>[see related submission to change the zoning of this land].</p>	<p>Rezone 2, 4, 6 and 12 Shaw Street and 6 and 6A Hislop Street from Rural Lifestyle Zone to General Residential Zone.</p>  <p>Shaw Street 2, 4, 6, 12 and Hislop Street 6 & 6A highlighted in yellow below.</p> <p>If the preferred relief of changing the zoning of lots on Hislop and Shaw Street to GRZ is not granted, then:</p> <p>Amend all relevant rules and standards of the RLZ-Rural Lifestyle Zone Chapter to exclude Lots existing at the time of public notification of the Proposed District Plan which are less than 2001 square metres in area.</p>
Malpati Regenvanu	180.2				Submission point deleted due to duplication, refer submission point 180.1.	Refer submission point 180.1.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Malpati Regenvanu	180.3	RLZ - Rural Lifestyle Zone	Standards	RLZ-S1 Height of buildings and structures	Oppose RLZ-S1 as it relates to 2, 4, 6, 12 Shaw Street and 6 & 6A Hislop Street. The standard when applied to these small Lots are overly restrictive and un-necessary within the urban precinct of Geraldine. [Refer original submission for full reason].	If the rezone request as it relates to 2, 4, 6, 12 Shaw Street and 6 & 6A Hislop Street isn't accepted, amend the standard to exclude Lots existing at the time of public notification of the Proposed District Plan which are less than 2001 square metres in area by providing an exemption for small lots from all of those RLZ standards which are impractical when applied to small lots.
Malpati Regenvanu	180.4	RLZ - Rural Lifestyle Zone	Standards	RLZ-S3 Building coverage	Oppose RLZ-S3 as it relates to 2, 4, 6, 12 Shaw Street and 6 & 6A Hislop Street. The standard when applied to these small Lots are overly restrictive and un-necessary within the urban precinct of Geraldine. [Refer original submission for full reason]	If the rezone request as it relates to 2, 4, 6, 12 Shaw Street and 6 & 6A Hislop Street isn't accepted, amend the standard to exclude Lots existing at the time of public notification of the Proposed District Plan which are less than 2001 square metres in area by providing an exemption for small lots from all of those RLZ standards which are impractical when applied to small lots.
Malpati Regenvanu	180.5	RLZ - Rural Lifestyle Zone	Standards	RLZ-S4 Boundary setbacks for buildings and structures	Oppose RLZ-S4 as it relates to 2, 4, 6, 12 Shaw Street and 6 & 6A Hislop Street. The standard when applied to these small Lots are overly restrictive and un-necessary within the urban precinct of Geraldine. Building setbacks of 8 metres on these small Lots are unrealistic. [Refer original submission for full reason]	If the rezone request as it relates to 2, 4, 6, 12 Shaw Street and 6 & 6A Hislop Street isn't accepted, amend the standard to exclude Lots existing at the time of public notification of the Proposed District Plan which are less than 2001 square metres in area by providing an exemption for small lots from all of those RLZ standards which are impractical when applied to small lots.
Malpati Regenvanu	180.6	RLZ - Rural Lifestyle Zone	Standards	RLZ-S5 Boundary treatment styles	Oppose RLZ-S5 as it relates to 2, 4, 6, 12 Shaw Street and 6 & 6A Hislop Street as the standard impinge on property ownership rights with the urban precinct of the Geraldine Township. The properties are small in nature with subdivision consent granted by Council with the intent of them being developed as residential properties, not rural residential properties. The standard is therefore an un-necessarily restriction without providing a benefit to the natural rural landscape of the Geraldine Downs. Such controls are inconsistent with other properties in the Geraldine Township. [Refer to original submission for full reason].	If the rezone request in relation to 2, 4, 6, 12 Shaw Street and 6 & 6A Hislop Street isn't accepted, amend the standard to exclude Lots existing at the time of public notification of the Proposed District Plan which are less than 2001 square metres in area by providing an exemption for small lots from all of those RLZ standards which are impractical when applied to small lots.
Malpati Regenvanu	180.7	RLZ - Rural Lifestyle Zone	Standards	RLZ-S6 Colour reflectance	Oppose RLZ-S6 as it relates to 2, 4, 6, 12 Shaw Street and 6 & 6A Hislop Street as the standard impinge on property ownership rights with the urban precinct of the Geraldine Township. The properties are small in nature with subdivision consent granted by Council with the intent of them being developed as residential properties, not rural residential properties. The standard is therefore un-necessarily restriction without providing a benefit to the natural rural landscape of the Geraldine Downs. Such controls are inconsistent with	If the rezone request in relation to 2, 4, 6, 12 Shaw Street and 6 & 6A Hislop Street isn't accepted, amend the standard to exclude Lots existing at the time of public notification of the Proposed District Plan which are less than 2001 square metres in area by providing an exemption for small lots from all of those RLZ standards which are impractical when applied to small lots.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
					<p>other properties in the Geraldine Township.</p> <p>[Refer to original submission for full reason].</p>	
Malpati Regenvanu	180.8	RLZ - Rural Lifestyle Zone	Standards	RLZ-S8 Trees Rural	<p>Oppose RLZ-S8 as it relates to 2, 4, 6, 12 Shaw Street and 6 & 6A Hislop Street as the standard impinge on property ownership rights with the urban precinct of the Geraldine Township. The properties are small in nature with subdivision consent granted by Council with the intent of them being developed as residential properties, not rural residential properties. The standard is therefore un-necessarily restriction without providing a benefit to the natural rural landscape of the Geraldine Downs. Such controls are inconsistent with other properties in the Geraldine Township.</p> <p>[Refer to original submission for full reason].</p>	<p>If the rezone request in relation to 2, 4, 6, 12 Shaw Street and 6 & 6A Hislop Street isn't accepted, amend the standard to exclude Lots existing at the time of public notification of the Proposed District Plan which are less than 2001 square metres in area by providing an exemption for small lots from all of those RLZ standards which are impractical when applied to small lots.</p>
Opuha Water Limited	181.1	General	General	General	<p>The submitter notes that the PDP E Plan contains various spelling and grammatical errors; omits the text for footnotes; shows terms as "defined" which either are not defined in the PDP (or the RMA) or do not have operational cross-linkages; contains inconsistent terminology both within chapters and across chapters; and refers to outdated (repealed) legislation (e.g., Health & Safety in Employment Act 1992) amongst other various issues, which are addressed in the specific submission points.</p> <p>The submitter seeks that such errors be addressed in the section 42A Report so that submitters can review the reporting officers' recommendations prior to the hearing of submissions, and offer further suggestions, if necessary.</p>	<p>Ensure the S.42A reports address the following errors in the PDP:</p> <ul style="list-style-type: none"> • drafting errors such as spelling and grammatical errors, omitted footnoted and inconsistency of terminology used within and between chapters; • technological issues, such as e-plan definition cross-linkage errors; • references to outdated (repealed) legislation.
Opuha Water Limited	181.2	Foreword or Mihi	Foreword or mihi	General	<p>Supports the Foreword or Mihi section and considers that it is appropriately worded and is consistent with the format and content envisaged by the National Planning Standards.</p>	<p>Retain as notified.</p>
Opuha Water Limited	181.3	Contents	Contents	General	<p>Supports the Contents section and considers that it is appropriately worded and is consistent with the format and content envisaged by the National Planning Standards.</p>	<p>Retain as notified.</p>
Opuha Water Limited	181.4	Purpose	General	General	<p>Supports the Purpose section and considers that it is appropriately worded and is consistent with the format and content envisaged by the National Planning Standards.</p>	<p>Retain as notified.</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Opuha Water Limited	181.5	Description of the District	Description of the district	General	Supports the Description of the District section and considers that it is appropriately worded and is consistent with the format and content envisaged by the National Planning Standards.	Retain as notified.
Opuha Water Limited	181.6	Statutory Context	Relationship with Other Planning Documents	Treaty of Waitangi / Te Tiriti o Waitangi and Māori Issues of Significance.	The submitter notes various footnotes have been omitted.	Amend the Statutory Context to include the text of omitted footnotes in the discussion under the sub-heading “Treaty of Waitangi/Te Tiriti o Waitangi and Māori Issues of Significance”.
Opuha Water Limited	181.7	Statutory Context	Relationship with Other Planning Documents	Other Planning Documents and Legislation Considered.	The submitter notes the PDP erroneously refers to the now repealed health and safety statute: Health and Safety in Employment Act 1992 and does not refer to its replacement statute: Health and Safety in Work Act 2015. Further acknowledges that aspects of the PDP may need to be revised as a consequence of outdated (repealed) legislation being considered in the development of the PDP.	Amend the Statutory Context to replace the reference to “Health and Safety in Employment Act 1992” with “Health and Safety in Work Act 2015”. Review and update the list of “Other Planning Documents and Legislation Considered” to ensure this is a list of current (not repealed) legislation. Make any consequential amendments to the PDP that may be required to reflect the requirements of current legislation where the development of the PDP has been informed by outdated (repealed) legislation.
Opuha Water Limited	181.8	General Approach	General	General	The submitter considers that during the course of its review of the PDP that, in some instances, linkages are provided in the text of the PDP’s chapters to the RMA or other statutory definitions, but those definitions have not been included in this section of the PDP. It is unclear if this was intentional or in error.	Amend the General Approach Section to include an explanatory note on the approach taken to defining terms and providing links to the definitions where they appear in the text of Chapters and Sections of the PDP.
Opuha Water Limited	181.9	Cross Boundary Matters	Cross boundary matters	General	Supports Cross boundary matters and considers these sections are appropriately worded and are consistent with the format and content envisaged by the National Planning Standards.	Retain as notified.
Opuha Water Limited	181.10	Relationships between Spatial Layers	General	General	Supports Relationships between spatial layers and considers these sections are appropriately worded and are consistent with the format and content envisaged by the National Planning Standards.	Retain as notified.
Opuha Water Limited	181.11	Definitions	Definitions	General	Supports in part definitions in the Proposed District Plan other than as outlined in the submissions points that follow in this Annexure.	Retain the definitions included in the PDP subject to the submissions on specific PDP definitions that are addressed in other submission points.
Opuha Water Limited	181.12	Definitions	Definitions	General	The submitter considers that it would be appropriate for the introductory section of the PDP to explain the approach that the PDP takes in terms of defining terms and providing links to the definitions where they appear in the text of Chapters and Sections of the PDP.	Amend to include in the PDP (potentially in the “General Approach” section of the “How the Plan Works” Chapter) an Explanatory Note addressing the approach that the PDP takes in terms of defining terms and providing links to the definitions where they appear in the text of Chapters and Sections of the PDP.
Opuha Water Limited	181.13	Definitions	Definitions	Regionally Significant Infrastructure	Supports and the definition of Regionally Significant Infrastructure as it is consistent with that included in higher	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
					order statutory planning documents such as the Canterbury Regional Policy Statement (CRPS).	
Opuha Water Limited	181.14	Definitions	Definitions	New	Considers a new definition for “alteration” be added to the plan, to aid interpretation of PDP in light of related relief sought on EI-P1.2.	Add a new definition of alteration (in relation to relief sought to EI-P1.2) as follows: <i><u>means, in relation to EI-P1(2), the act of altering the alignment of a network utility or infrastructure during an emergency.</u></i>
Opuha Water Limited	181.15	Definitions	Definitions	New	The submitter seeks to include a new definition of “Natural Hazard Areas”, which is a term referred to in the Natural Hazards chapter but is not defined.	Add a new definition of Natural Hazard Areas as follows: <i><u>means areas subject to the Flood Assessment Area, Overland Flow Paths, and High Hazard Overlays.</u></i>
Opuha Water Limited	181.16	Definitions	Definitions	New	The submitter seeks to include a new definition of the term “water infrastructure” as it is used variously within the PDP’s chapters, particularly the Energy and Infrastructure Chapter.	Add a new definition of Water Infrastructure ” as follows, or similar: <i><u>means water storage and supply, stormwater or wastewater infrastructure.</u></i>
Opuha Water Limited	181.17	Abbreviations	General	General	The submitter considers the Abbreviations section is appropriately worded and is consistent with the format and content envisaged by the National Planning Standards.	Retain as notified.
Opuha Water Limited	181.18	Glossary	Glossary	General	The submitter considers that the Glossary is appropriately worded and is consistent with the format and content envisaged by the National Planning Standards.	Retain as notified.
Opuha Water Limited	181.19	General	General	General	Supports the National Directions Instruments section and considers that it is appropriately worded and is consistent with the format and content envisaged by the National Planning Standards.	Retain the National Directions Instruments section as notified.
Opuha Water Limited	181.20	Mana whenua	General	General	Supports the Mana Whenua section and considers that it is appropriately worded and is consistent with the format and content envisaged by the National Planning Standards.	Retain the Mana Whenua Chapter as notified.
Opuha Water Limited	181.21	SD - Strategic Direction	General	General	Supports the range of strategic directions in this Chapter, particularly, the recognition of the benefits of regionally significant infrastructure and their importance within the district as articulated in SD-O8 Infrastructure.	Not specified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Opuha Water Limited	181.22	SD - Strategic Direction	Objectives	SD-O5 Mana Whenua	<p>Considers that while it is important to retain and enhance access to sites for customary activities there is a concern that public access cannot always be available, particularly when there is a statutory health and safety reason to restrict access.</p> <p>The submitter notes that the PDP's objectives and policies for Public Access and Esplanades expressly acknowledge that public health and safety as a legitimate basis on which public access can be avoided. Accordingly, minor amendments are sought.</p>	<p>Amend SD-O5 Mana Whenua as follows:</p> <p><i>The mana whenua status of Kāti Huirapa is recognised and their historic and contemporary relationship with the District's land, water bodies and wetlands, coastal environment, and indigenous species is recognised and provided for by ensuring:</i></p> <p>[...]</p> <p>iv. <i>Where appropriate, Kāti Huirapa retains, and where appropriate is able to enhance access to their sites and areas of significance; ...</i></p> <p>vi. <i>Where appropriate, Kāti Huirapa are able to carry out customary activities in accordance with tikanga; ...</i></p>
Opuha Water Limited	181.23	UFD - Urban Form and Development	Urban form and development	UFD-O1 Settlement Patterns	Considers UFD-O1.ix and x will ensure that future development in the District does not compromise the safe, efficient and effective operation, maintenance, renewal and upgrading of RSI, such as water supply infrastructure.	Retain as notified.
Opuha Water Limited	181.24	EI - Energy and Infrastructure	Introduction	General	Supports the Introduction section as it identifies all relevant issues for existing and future scheme/sub-scheme infrastructure in the Timaru District.	Retain the as notified.
Opuha Water Limited	181.25	EI - Energy and Infrastructure	Objectives	EI-O1 Regionally Significant Infrastructure	Except for a grammatical errors that needs correcting, the submitter considers this objective is appropriate in that it recognises the importance of RSI in the District.	<p>Amend E1-O1 Regionally Significant Infrastructure as follows:</p> <p><i>Effective, resilient, efficient and safe Regionally Significant Infrastructure and Lifelines Utilities that:</i></p> <ol style="list-style-type: none"> 1. <i>provides...</i> 2. <i>facilitates...</i> 3. <i>contributes...</i> 4. <i>is-are...</i> 5. <i>enables..</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Opuha Water Limited	181.26	EI - Energy and Infrastructure	Objectives	EI-O2 Adverse effects of Regionally significant Infrastructure	<p>Concerned that there are inconsistencies between the directive in E1-O2.1 and its implementing Policy E1-P2.1 and policies NH-P11 E1-P1.</p> <p>These inconsistencies need to be corrected to ensure the PDP complies with section 75(1)(b) of the RMA. The inconsistencies also cut across the directives in section 104(1)(ab) of the RMA, which requires that, when considering an application for resource consent, the consenting authority must have regard to: <i>...any measure ... to offset or compensate for any adverse effects on the environment</i></p> <p>An effects management hierarchy, such as that set out in the (NPS-FM) for managing the adverse effects of an activity on the extent or values of a natural inland wetlands and rivers, would be a more appropriate approach to managing effects on the listed “sensitive environments”.</p> <p>[See original submission for full reasons]</p>	<p>Amend EI-O2 Adverse effects of Regionally significant Infrastructure as follows:</p> <p><i>The adverse effects of Regionally Significant Infrastructure and Lifeline Utilities:</i></p> <p><i>1. are avoided in sensitive environments unless there is a functional or operational need for the infrastructure to be in that location, in which case they must be remedied or mitigated; where practicable, and:</i></p> <p><i>a. where adverse effects cannot be avoided, they are minimised where practicable; and</i></p> <p><i>b. where adverse effects cannot be minimised, they are remedied where practicable; and</i></p> <p><i>c. where more than minor residual adverse effects cannot be avoided, minimised, or remedied, offsetting is provided where possible; and</i></p> <p><i>d. if offsetting of more than minor residual adverse effects is not possible, compensation is provided; and</i></p> <p><i>e. if compensation is not appropriate, the activity itself must be avoided from the sensitive environment.</i></p> <p>[...]</p>
Opuha Water Limited	181.27	EI - Energy and Infrastructure	Objectives	EI-O4 Adverse effects on Regionally Significant Infrastructure and Lifeline Utilities	Supports E1-O4 as it provides direction that will ensure appropriate safeguards against the effects of activities on RSI.	Retain as notified.
Opuha Water Limited	181.28	EI - Energy and Infrastructure	Policies	EI-P1 Recognising the benefits of Regionally Significant Infrastructure and lifeline utilities	Notes the policy does not contemplate potential scenarios where activities other than removal of existing RSI is required during an emergency. Considers the policy should address alterations such as realignment of infrastructure in a potential emergency. Note the related relief sought for a definition of ‘alteration’ to be added to the PDP. Otherwise supports the policy.	<p>Amend EI-P1 Recognising the benefits of Regionally Significant Infrastructure and Lifeline Utilities as follows:</p> <p><i>Recognise the benefits of Regionally Significant Infrastructure and Lifelines Utilities by:</i></p> <p>[...]</p> <p><i>2. enabling their removal <u>or alteration</u> during an emergency;</i></p> <p>[...]</p> <p>AND</p> <p>Include a definition in the PDP for the term “alteration” as stated in the related relief sought on a new definition.</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Opuha Water Limited	181.29	EI - Energy and Infrastructure	Policies	EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure	<p>Supports aspect of this policy but concerned that the wording of clause 1.f creates an extremely high threshold that would be difficult for any new works to meet and is inconsistent with the treatment of urban water distribution networks.</p> <p>In relation to clause (2) of EI-P2, it would be appropriate for the list of matters that are had regard to when determining the functional or operational need of RSI to be expanded to include a further locational consideration to recognise that there are often situations where there are no feasible alternative locations for RSI works.</p> <p>[Refer to original submission for full reason.]</p>	<p>Amend EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure, as follows:</p> <ol style="list-style-type: none"> 1. In relation to EI-P2.1, either: <ol style="list-style-type: none"> a. Delete EI-P2.1.f; b. Reword EI-P2.1.f by clearly identifying the environmental outcome this sub-clause is seeking to achieve; c. Reword EI-P2.1.f to apply only to areas of Significant Natural Areas or Outstanding Natural Landscapes or other specific “sensitive environments” (if this is the issue that Council is seeking to address); and d. retain the remaining parts. <p>AND</p> <ol style="list-style-type: none"> 2. In relation to EI-P2.2, amend as follows: <ol style="list-style-type: none"> 2. <i>recognising the functional or operational need of Regionally Significant Infrastructure and other infrastructure activities, and having regard to:</i> <ol style="list-style-type: none"> a. [...]; and e. <i>their location, including:</i> <ol style="list-style-type: none"> i. <i>the complexity and connectedness of the networks and services;</i> ii. <i>the potential for co-location and shared use of infrastructure corridors; and</i> iii. <i><u>the extent to which there are feasible alternative locations; and</u></i> f. <i>for renewable energy generation, the need to locate where the natural resources occur.</i>
Opuha Water Limited	181.30	EI - Energy and Infrastructure	Policies	EI-P3 Adverse effects on Regionally Significant Infrastructure	Considers the policy will ensure that adverse effects of activities on RSI are appropriately managed through location and design.	Retain as notified.
Opuha Water Limited	181.31	EI - Energy and Infrastructure	Rules	Note	The submitters supports the clarification provided in the Introductory Notes to the Rules in this Chapter, specifically in terms of the precedence afforded to Rules in Sections A - F to the Zone Chapter Rules in Part 3 of the PDP (Area-Specific Matters) in terms of RSI.	Retain the introductory notes to EI - Energy and Infrastructure that applies to Section C Rules as notified.
Opuha Water Limited	181.32	EI - Energy and Infrastructure	Section C - Rules for network utilities - Three Waters	General	Considers the title does not reflect the actual scope of activities governed by the Rules that follow, which are urban and rural water infrastructure, and ancillary network utilities.	<p>Amend Section C Rules for network utilities - Three Waters as follows:</p> <p>Rules Section C - Rules for network utilities - Three waters <u>Water Infrastructure and ancillary network utilities</u>.</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Opuha Water Limited	181.33	EI - Energy and Infrastructure	Section C - Rules for network utilities - Three Waters	General	The submitter notes the terms “infrastructure” and “network utilities” are used interchangeably in the Rules and Conditions, whereas the Objectives and Policies in the Chapter tend to refer primarily to “infrastructure”. Consistency in terminology across the chapter would be preferable and reduce the risk of interpretation issues.	Amend the terminology used in the Section C Rules for network utilities - Three Waters to ensure consistency and alignment with the Objectives and Policies (particularly address the interchangeable use of the terms “infrastructure” and “network utilities”).
Opuha Water Limited	181.34	EI - Energy and Infrastructure	Rules Section C - Rules for network utilities - Three Waters	EI-R22 Construction, maintenance repair and upgrading of underground water supply, wastewater systems and stormwater infrastructure	Opposes EI-R22 as the maintenance, repair and upgrading of underground water supply infrastructure appear to fall under both Rules EI-R22 and EI-R25. Similarly, the construction of new underground water supply infrastructure appears to fall under both Rules EI-R26.	Delete EI R22 .
Opuha Water Limited	181.35	EI - Energy and Infrastructure	Rules Section C - Rules for network utilities - Three Waters	EI-R25 Maintenance, repair and upgrading of ... water systems infrastructure, including: [...]	Supports EI-R25 in part and but requests inclusion of ‘structure’ to PER-1 to address infrastructure and to be consistent with other parts of the PDP. Requests amendments to the title of EI-R25 to reflect what the rule addresses.	Amend EI-R25 as follows: EI-R25 Maintenance, repair and upgrading of ... water systems infrastructure, including: [...] [...] PER-1 Building or <u>structure</u> maintenance and upgrades occur within the existing building <u>or structure</u> envelope; or [...] (or alternative wording that better reflects the nature of the activity being controlled by this condition)
Opuha Water Limited	181.36	EI - Energy and Infrastructure	Rules Section E - Rules for Renewable Electricity Generation	EI-R31 Installation, operation, maintenance, repair ... for renewable electricity generation	Supports E1-R31 as it provides specific rules for all types of renewable energy generation facilities and activities. This inclusion, and the proposed rules, ensure that the PDP gives appropriate effect to the National Policy Statement for Renewable Energy Generation 2011.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Opuha Water Limited	181.37	EI - Energy and Infrastructure	Rules Section E - Rules for Renewable Electricity Generation	EI-R32 The installation, operation, maintenance, upgrading and removal of a solar cell or any array of solar cells for a small-scale renewable electricity generation and its use.	Supports E1-R31 as it provides specific rules for all types of renewable energy generation facilities and activities and gives appropriate effect to the National Policy Statement for Renewable Energy Generation 2011.	Retain as notified.
Opuha Water Limited	181.38	EI - Energy and Infrastructure	Rules Section E - Rules for Renewable Electricity Generation	EI-R33 The installation, operation, maintenance, upgrading and removal of a small-scale wind turbine/s for small scale-scale renewable electricity generation and its use	Supports EI-R33 as it provides specific rules for all types of renewable energy generation facilities and activities and gives effect to the National Policy Statement for Renewable Energy Generation 2011.	Retain as notified.
Opuha Water Limited	181.40	EI - Energy and Infrastructure	Rules Section E - Rules for Renewable Electricity Generation	EI-R34 Solar hot water system	Supports EI-R34 as it provides specific rules for all types of renewable energy generation facilities and activities and gives effect to the National Policy Statement for Renewable Energy Generation 2011.	Retain as notified.
Opuha Water Limited	181.41	EI - Energy and Infrastructure	Rules Section E - Rules for Renewable Electricity Generation	EI-R35 The installation and upgrading of large-scale renewable electricity generation activities	Supports EI-R35 as it provides specific rules for all types of renewable energy generation facilities and activities and gives effect to the National Policy Statement for Renewable Energy Generation 2011.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Opuha Water Limited	181.42	EI - Energy and Infrastructure	Rules Section G - Flight Paths Protection for Richard Pearse Airport (Timaru Airport)	EI-R38 Creation of a new stormwater basin or water body (including wastewater oxidation Pond) which exceeds 500m in area)	The submitter opposes EI-R38 in part as it may foreclose the future upgrade of its Levels Plains water scheme that is located within the Birdstrike Management Area Overlay and which requires a restricted discretionary consent for a storage pond. Considers it appropriate for the matters of discretion to include operational and function requirements of such infrastructure. Also considers there is an inconsistency between the rule title and PER-1 regarding the waterbody threshold.	Amend EI -R38 as follows: <i>EI-R38 Creation of a new stormwater basin; or water body (including wastewater oxidation pond) which exceeds 500 1000m² in area)</i> [...] Matters of discretion are restricted to: <i>1. The functional needs and operational needs of, and benefits from, the activity;</i> <i>2. 1. Scale and significance of birdstrike risk likely to be created at the location proposed; and</i> [...]
Opuha Water Limited	181.43	EI - Energy and Infrastructure	Standards	EI-S1 Maximum structure height for network utility structures of poles, antenna, towers and telecommunication poles (including the combined height of poles and antenna)	Considers the ' interchangeable use of 'infrastructure' and 'network utilities' is confusing and it makes it difficult for plan users to determine which standards apply to water infrastructure. Notes that adjustments to the terminology in the title and listed requirements in the standards maybe required if it is intended that EI-S1 applies to water infrastructure, as opposed to network utilities ancillary to such infrastructure (such as boosters and repeaters).	Retain EI-SI subject to amending the terminology used in the standard to ensure consistency and alignment with the Objectives and Policies (particularly the interchangeable use of the terms 'infrastructure' and 'network utilities'), if this is necessary to reflect that it was intended for other than the below elements of EI-S1 to apply to water infrastructure (as opposed to network utilities ancillary to such infrastructure): <ul style="list-style-type: none"> • E1-S2(1) • EI-S2(8) • EI-S2(11) • E1-S2 - matters of discretion (1) and (2) for Restricted Discretionary Activities.
Opuha Water Limited	181.44	EI - Energy and Infrastructure	Standards	EI-S2 Upgrading infrastructure	Considers the interchangeable use of 'infrastructure' and 'network utilities' is confusing and it makes it difficult for plan users to determine which standards apply to water infrastructure. Notes that adjustments to the terminology in the title and listed requirements in the standards maybe required if it is intended that EI-S1 applies to water infrastructure, as opposed to network utilities ancillary to such infrastructure (such as boosters and repeaters).	Retain EI-S2 subject to amending the terminology used to ensure consistency and alignment with the Objectives and Policies (particularly the interchangeable use of the terms "infrastructure" and "network utilities"), if this is necessary to reflect that it was intended for other than the below elements of EI-S1 to apply to water infrastructure (as opposed to network utilities ancillary to such infrastructure): <ul style="list-style-type: none"> • E1-S2(1) • EI-S2(8) • EI-S2(11) • E1-S2 - matters of discretion (1) and (2) for Restricted Discretionary Activities.
Opuha Water Limited	181.45	NH - Natural Hazards	Objectives	NH-O1 Areas subject to natural hazards	Supports NH-O1, but questions whether the reference in NH-O1 and O2 to "high hazard areas" is intended to be "High Hazard Areas", which is a term defined in the PDP.	Amend NH-O1 Areas subject to natural hazards as follows: <i>Risk to human life and significant risk to property, from natural hazards is:</i> <i>1. avoided in high hazard areas High Hazard Areas; and avoided or mitigated elsewhere to an acceptable level.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Opuha Water Limited	181.46	NH - Natural Hazards	Objectives	NH-O2 Regionally Significant Infrastructure	Conditionally supports NH-O2 but questions whether the reference in NH-O1 and O2 to "high hazard areas" is intended to be "High Hazard Areas", which is a term defined in the PDP.	Amend NH-O2 Regionally Significant Infrastructure as follows: <i>Regionally Significant Infrastructure is located outside of high hazard areas <u>High Hazard Areas</u> where practicable.</i>
Opuha Water Limited	181.47	NH - Natural Hazards	Objectives	NH-O3 Natural hazard mitigation works	None specified.	Retain as notified.
Opuha Water Limited	181.48	NH - Natural Hazards	Policies	General	Conditionally supports NH-P1 -P11 subject to any consequential amendments required to give effect to the changes the submitter seeks to Rules NH-R3, R4 and R6 noted in submission points below.	Retain NH-P1 - P11 as notified, subject to any consequential amendments required to give effect to the submission points in relation to Rules NH-R3, R4 and R6.
Opuha Water Limited	181.49	NH - Natural Hazards	Rules	NH-R1 Earthworks, excluding land disturbance and for natural hazard mitigation works	Not specified.	Retain as notified.
Opuha Water Limited	181.50	NH - Natural Hazards	Rules	NH-R2 Fences	Not specified.	Retain as notified.
Opuha Water Limited	181.51	NH - Natural Hazards	Rules	NH-R5 Regionally Significant Infrastructure - maintenance, replacement and upgrading	Not specified.	Retain as notified.
Opuha Water Limited	181.52	NH - Natural Hazards	Rules	NH-R7 Natural Hazard Sensitive Activities and additions, new buildings, and structures with a ground floor area of less than 30m ² (excluding Regionally Significant Infrastructure)	Not specified.	Retain as notified.
Opuha Water Limited	181.53	NH - Natural Hazards	Rules	NH-R8 Subdivision 1 Flood Assessment	Not specified.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Opuha Water Limited	181.54	NH - Natural Hazards	Rules	NH-R3 Natural hazard Mitigation works - maintenance, replacement and upgrading	Considers it is appropriate for the permitted activity status given to natural hazard works in the Flood Area Overlay and High Hazard Area Overlay to be extended to network utility operators of RSI subject to compliance with the regional plan or the flood protection bylaw This would give due recognition to the importance of RSI to the District.	Amend NH-R3 Natural hazard Mitigation works - maintenance, replacement and upgrading as follows: [...] PER-5 <u>The activity is undertaken by or on behalf of a network utility operator of regionally significant infrastructure in accordance with a rule in the Canterbury Land and Water Regional Plan or a resource consent and/or approval granted by the Canterbury Regional Council.</u>
Opuha Water Limited	181.55	NH - Natural Hazards	Rules	NH-R4 Natural hazard sensitive activities or structures and additions to such activities or structures with a ground floor area of 30M ² or more	Considers the title of the rule should specifically exclude Regionally Significant Infrastructure to be consistent with the rule. The submitter also suggests that NH-R4 would be better located after NH-R7, as the two rules relate to similar activities and are currently separated by rules applying to RSI.	Amend NH-R4 as follows: NH-R4 Natural hazard sensitive activities or structures and additions to such activities or structures with a ground floor area of 30m² or more (excluding Regionally Significant Infrastructure). [...] AND Move Rule NH-R4 to after NH-R7 or otherwise make amendments to ensure it is clear which rules apply to RSI and which do not.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Opuha Water Limited	181.56	NH - Natural Hazards	Rules	NH-R6 Regionally Significant Infrastructure - New NH-R6.1 does not apply if: [...]	Under NH-R6.1 new RSI would be a restricted discretionary activity if the land is subject to flooding in the 0.5%AEP event (PER-5) irrespective of minimum floor level. This is inconsistent with NH-R4.1 which enables new RSI on such land if it complies with the minimum flow (sic) level requirement. Other consequential changes may be required. Concern also that new RSI on land classified as Overland Flow Path would default to restricted discretionary status irrespective of whether the infrastructure has been designed to maintain the function of the Overland Flow Path and minimise any increase or new risk from flooding. Concerned new RSI on land within the High Hazard Area Overlay would default to restricted discretionary status irrespective of whether the infrastructure has been designed for the natural hazard. [Refer to original submission for full reason.]	Amend NH-R6 Regionally Significant Infrastructure [...] as follows: 1. Flood Assessment Areas Overlay [...] PER-3 <i>The Flood Risk eCertificate issued under PER-1 states that either:</i> <i>1. the activity is located on land that is not subject to flooding in a 0.5% AEP rainfall event; or</i> <i>2. the activity is located on land that is subject to flooding in a 0.5% AEP rainfall event and complies with the minimum finished floor level requirement for the site.</i> AND and any consequential or additional amendments that may be required to Rule NH-R6.1, e.g., to the matters of discretion listed in RDIS-1 AND Amend NH-R6.2 to allow new RSI in Overland Flow Paths as a permitted activity subject to compliance with an alternative condition to conditions PER-1 to 3 requiring that the infrastructure has been designed to maintain the function of the Overland Flow Path and certification from a suitably qualified and experienced person (e.g., chartered engineer) that the design will minimise any increase or new risk from flooding on surrounding properties (or alternative condition with similar effect); AND Amend NH-R6.3 to allow new RSI in the High Hazard Risk Overlay as a permitted activity subject to compliance with a condition requiring that the infrastructure has been designed to maintain its integrity and function during and after a natural hazard event (or an alternative condition with similar effect, e.g., certification of design any a suitably qualified and experienced person to meet that outcome); AND Include a definition in the PDP for the term ' Natural Hazard Areas ' (refer related submission on the Definitions chapter).
Opuha Water Limited	181.57	HH - Historic Heritage	General	General	Considers it would be appropriate for the policies and rules of this chapter to include similar regionally significant infrastructure/network utility provisions to NFL-P4.7.d and NFL-R3. The earlier submission on consistency in terminology across the PDP, particularly in relation to 'infrastructure' and 'network utilities', should also be noted.	Add new policies and rules to Historic Heritage chapter to address RSI within the sensitive environments addressed by this chapter similar to NFL-P4(7)(d) and NFL-R3.
Opuha Water Limited	181.58	SASM - Sites and Areas of Significance to Māori	Objectives	SASM-O2 Access and use	Acknowledges the importance for Kāti Huirapa to retain and enhance access to SASM and to carry out customary activities within them but suggest it's not always appropriate to allow public access to its infrastructure for public health and safety reasons.	Amend SASM-O2 Access and Use as follows: <i>Where appropriate, Kāti Huirapa are able to access, maintain and use resources and areas of cultural value within identified Sites and Areas of Significance to Kāti Huirapa.</i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Opuha Water Limited	181.59	SASM - Sites and Areas of Significance to Māori	Policies	General	Considers it would be appropriate for the policies and rules of this chapter to include similar regionally significant infrastructure/network utility provisions to NFL-P4.7.d and NFL-R3. The earlier submission on consistency in terminology across the PDP, particularly in relation to 'infrastructure' and 'network utilities', should also be noted.	Add a new policy in the SASM chapter that address RSI within the sensitive environments addressed by this chapter.
Opuha Water Limited	181.60	SASM - Sites and Areas of Significance to Māori	Rules	SASM-R2 Buildings and structures, including additions and alterations to existing buildings and structures and network utilities	SASM-R2 to be retained as it expressly address network utilities/infrastructure activities.	Retain as notified.
Opuha Water Limited	181.61	ECO - Ecosystems and Indigenous Biodiversity	General	General	Considers it would be appropriate for the policies and rules of this chapter to include similar regionally significant infrastructure/network utility provisions to NFL-P4.7.d and NFL-R3. The earlier submission on consistency in terminology across the PDP, particularly in relation to 'infrastructure' and 'network utilities', should also be noted.	Add a new Policy and Rules in the ECO- Ecosystems and indigenous biodiversity chapter that address RSI within the sensitive environments addressed by this chapter similar to NFL-P4(7)(d) and NFL-R3.
Opuha Water Limited	181.62	ECO - Ecosystems and Indigenous Biodiversity	Rules	ECO-R2 Clearance of indigenous vegetation for natural hazard mitigation works	The submitter considers that (similar to its earlier submission on the Natural Hazards Chapter), clearance of indigenous vegetation for works by network utility operators of RSI should be enabled by way of a permitted activity under ECO-R2, if they are undertaken by a network utility operator of RSI in accordance with a rule in the Canterbury Land and Water Regional Plan, resource consent or other approval (e.g., under the Flood Protection and Drainage Bylaw 2013) from the Canterbury Regional Council.	Amend ECO-R2 Clearance of indigenous vegetation for the natural hazard mitigation works as follows: [...] PER-3 <i>The activity is undertaken by or on behalf of a network utility operator of regionally significant infrastructure in accordance with a rule in the Canterbury Land and Water Regional Plan or a resource consent and/or approval granted by the ... Council.</i>
Opuha Water Limited	181.63	NFL - Natural Features and Landscapes	General	General	Considers it would be appropriate for the policies and rules of this chapter to include similar regionally significant infrastructure/network utility provisions to NFL-P4.7.d and NFL-R3. The earlier submission on consistency in terminology across the PDP, particularly in relation to 'infrastructure' and 'network utilities', should also be noted.	Amend the NFL-Natural Features and Landscapes Chapter to include a new policy and rule that address RSI within Sensitive Environments.
Opuha Water Limited	181.64	NFL - Natural Features and Landscapes	Policies	NFL-P4 Protecting Outstanding Natural Features and outstanding Natural landscapes	Considers it is appropriate for the policies and rules of this chapter to include regionally significant infrastructure/network utility provisions: NFL-P4.7.d and NFL-R3. The inclusion of these provisions provides clarity for plan users and those implementing and enforcing the PDP for such activities.	Retain NFL-P4.7.d Protecting Outstanding Natural Features and outstanding Natural landscapes as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Opuha Water Limited	181.65	NFL - Natural Features and Landscapes	Rules	NFL-R3 Network utilities including associated earthworks	Considers it is appropriate for the policies and rules of this chapter to include regionally significant infrastructure/network utility provisions: NFL-P4.7.d and NFL-R3. The inclusion of these provisions provides clarity for plan users and those implementing and enforcing the PDP for such activities.	Retain NFL-R3 Network utilities including associated earthworks as notified.
Opuha Water Limited	181.66	PA - Public Access	Objectives	PA-O1 Public Access	Considers the use of the term “desirable” is not suitable in the context of Policy PA-P4. Instead “appropriate” would better reflect that context, which includes restricting public access for public health and safety reasons.	Amend PA-O1 Public Access as follows: <i>Public access to and along the coastal marine area and the margins of identified wetland and rivers is maintained and enhanced, and only restricted when desirable <u>appropriate</u>.</i>
Opuha Water Limited	181.67	PA - Public Access	Policies	PA-P4 Limiting public access	Not specified.	Retain as notified.
Opuha Water Limited	181.68	PA - Public Access	Rules	PA-R1 Any new land use, subdivision or development	Not specified.	Retain as notified.
Opuha Water Limited	181.69	Planning Maps	Transitional Highly Productive Land - Proposed District Plan		Supports the Transitional Highly Productive Land - Proposed District Plan Overlay and considers that it is consistent with, and give appropriate effect to, the directions of the National Policy Statement for Highly Productive Land 2022.	Retain the Transitional Highly Productive Land - Proposed district plan layer as notified.
Opuha Water Limited	181.70	VS - Versatile Soil	General	General	Not specified.	Retain the Versatile Soils Chapter as notified.
Opuha Water Limited	181.71	Planning Maps	Versatile Soils Overlay		The submitter supports the provisions of the proposed Versatile soils overlay in the planning maps of the PDP. The submitter considers these; elements of the PDP are consistent with, and give appropriate effect to, the; directions of the National Policy Statement for Highly Productive Land 2022.	Retain the proposed Versatile Soils Overlay as notified.
Opuha Water Limited	181.72	ASW - Activities on the Surface of Water	Rules	ASW-R2 The use of motorised craft for specific environmental management or search and rescue purposes	Supports, in part, ASW- R2 and seeks to ensure the use of motorised craft on the surface of water (rivers) for inspecting infrastructure (such as water intake structures and associated scheme infrastructure) and resource consent compliance monitoring is not precluded by the PDP. These activities are not expressly covered by the proposed rules in this chapter.	Amend ASW-R2 The use of motorised craft for specific environmental management or search and rescue purposes as follows: [...] PER-7 <i><u>The use is for undertaking inspections or regionally significant infrastructure and resource consent monitoring by a network utility operator.</u></i>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Opuha Water Limited	181.73	EW - Earthworks	Policies	EW-P4 Infrastructure	Supports the approach of EW-P4 to protecting RSI from the adverse effects of infrastructure but seeks amendments to EW-R1.	Retain as notified.
Opuha Water Limited	181.74	EW - Earthworks	Rules	EW-R1 Earthworks, excluding earthworks [...]	Supports the chapter's proposed approach but request amendments to clause (e) of EW-R1 as a consequence of the submitter's submission on ECO-R2 and NH-R3 above.	Amend the rule heading of EW-R1 Earthworks [...] as follows: EW-R1 Earthworks, excluding earthworks: <ul style="list-style-type: none"> a. <i>for tree planting, or the removal of trees not protected by the District Plan;</i> b. <i>for test pits, wells or boreholes [...]</i> c. <i>[...]</i> d. <i>[...]</i> e. <i>for natural hazard mitigation works carried out by:</i> <ul style="list-style-type: none"> i. <u><i>Timaru District Council or Canterbury Regional Council that are permitted; or</i></u> ii. <u><i>by or on behalf of a network utility operator of regionally; significant infrastructure in accordance with a rule in the; Canterbury Land and Water Regional Plan or a resource; consent and/or approval granted by the Canterbury Regional Council.</i></u>
Opuha Water Limited	181.75	Natural Environment Values	Natural Character	Policies and rules	For consistency and to aid plan interpretation, OWL considers it would be appropriate for the policies and rules of this chapter to include similar regionally significant infrastructure/network utility provisions to NFL-P4(7)(d) and NFL-R3. (noting OWL's earlier submission requesting greater consistency in terminology across the PDP, particularly in relation to "infrastructure" and "network utilities").	Include a new policy and rule in the Natural character chapter that address RSI within the sensitive environments addressed by this chapter, similar to NFL-P4(7)(d) and NFL-R3.
Federated Farmers	182.1	General	General	General	Seeks that the District Plan contains a resource management policy framework that enables primary production in rural areas to occur as existing uses where it is already established and with as few barriers where it is sought to establish new primary production activities.	Amend the PDP to: <ul style="list-style-type: none"> (a) include a clear pathway for existing primary production activities to continue in the rural zones of the Timaru district; and (b) Any consequential amendments required as a result of the relief sought.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Federated Farmers	182.2	General	General	General	<p>The submitter supports the Council's intention for having many activities able to occur without having an activity classification assigned to them. This recognises that there are activities which can occur without creating adverse effects on the environment and without the need to have controls specified in the District Plan. The submitter also supports the use of the permitted activity classification where some control is required.</p> <p>Submitter seeks that where a consent status is required, Council uses controlled status rather than restricted discretionary and or discretionary which allows Council the ability to decline. This would assist the Council in future proofing the plan for when the Natural and Built Environment Act comes into force which has indicated the removal of the restricted discretionary activity classification. 2.4 Controlled activities require resource consent but are always granted by the consent authority. The application for a resource consent will be assessed according to specified matters over which the Council will exercise its control.</p> <p>Controlled activity consents give certainty to users that the resource consent will be granted provided certain conditions are met. This is appropriate for activities that will have no more than minor effects on the environment and where the non-compliance with the permitted activities rules is minor. Submitter does not support Council moving from permitted activity to restricted discretionary and discretionary activity status without the allowance for a controlled activity. The resource consent process can be costly and result in significant time delays. The more restrictive activity classifications should only be imposed where there is evidence to support that there is a need for the Council to have reserved its discretion over several matters which need to be met.</p> <p>[Refer to original submission for full reason]</p>	<p>Review the District Plan to:</p> <ol style="list-style-type: none"> 1. apply a controlled activity status where possible. <p>AND</p> <ol style="list-style-type: none"> 2. provide rules that are: <ol style="list-style-type: none"> (a) are written clearly and concisely; (b) have conditions that are able to be complied with and are enforceable; (c) are consistent with objectives and policies contained in the District Plan; (d) avoid the reservation of the council's discretion where it is not required or appropriate; (e) are consistent with the rules of other authorities such as the National Grid provide; (f) are consistent with the national direction set through National Environmental Standards and National Policy Statements; and (g) minimise the use of prohibited activity status which place unwarranted barriers for resource consent applicants.
Federated Farmers	182.3	Planning Maps	General	General	<p>Considers that mapping and identifying sites of significance needs to be completed with landowners involved, educated, and knowledgeable of the area of significance to them.</p> <p>It is also important that any restrictions that are placed across the private property is accurate and able to be backed by hard evidence.</p>	<ol style="list-style-type: none"> 1. request in mapping and identifying sites of significance are completed, Council ensures to makes landowners involved, educated, and knowledgeable of the area of significance to them. 2. Ensure that any restrictions that are placed across the private property is accurate and able to be backed by hard evidence.
Federated Farmers	182.4	Description of the District	Rural Areas	General	Supports this Chapter.	Retain as notified.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Federated Farmers	182.5	Definitions	Definitions	Access way / Accessway	Supports this definition.	Retain as notified.
Federated Farmers	182.6	Definitions	Definitions	Amenity Planting	Considers the definition is clear, concise and easy to understand. But considers it would be appropriate to add further to the definition that appropriately includes farms as actively amenity planting within the definition.	<p>1. Amend the definition of Amenity Planting as follows: <i>means any vegetation and/or trees planted in the immediate vicinity of a residential unit, or rural residential development, primarily to provide aesthetic appeal, shelter or domestic food supply. Amenity planting includes any woodlot, orchard or vineyard (to a maximum combined area of 1ha) planted within 100m of a residential unit or rural residential development.</i></p> <p>AND</p> <p>2. Any consequential amendments required as a result of the relief sought.</p>
Federated Farmers	182.7	Definitions	Definitions	Ancillary Rural Earthworks	Seeks the inclusion of new definition for 'Ancillary Rural Earthworks' into the district plan to encompass commonplace activities that should not have to apply for resource consent. [Refer to original submission for full reason]	<p>Delete the notified definition of Ancillary Rural Earthworks and replace with a new definition as follows:</p> <p><i>Ancillary Rural Earthworks</i></p> <ul style="list-style-type: none"> <i>any earthworks or disturbance of soil associated with cultivation, land preparation (including the establishment of sediment and erosion control measures), for planting and growing operations of crops and pasture;</i> <i>the harvesting of agricultural and horticultural crops (farming) and forests (forestry); and planting trees, removing trees and horticultural root ripping;</i> <i>the maintenance and construction of facilities typically associated with farming and forestry activities. This includes (but is not limited to): farm/forestry tracks, roads, vehicle manoeuvring areas and landings, stock marshalling yards, stock races, silage pits, offal pits, farm effluent ponds, feeding pads, digging post holes, fencing and sediment control measures, drilling bores, the installation and maintenance of services such as water pipes and troughs, off-stream farm water storage dams, hard stand areas for stock, fertiliser storage pads, airstrips and helipads; and</i> <i>farm quarries where quarry winnings are only used within the farm quarry.</i> <p>AND</p> <p>Any consequential amendments required as a result of the relief sought.</p>
Federated Farmers	182.8	Definitions	Definitions	Clearance of Indigenous Vegetation	<p>Opposes in part the definition of 'Clearance of Indigenous Vegetation'. This definition has been slightly taken out of context from the 'National Policy Statement for Improved Pastures'. and can create confusion among farmers.</p> <p>Considers it helpful if the definition covers the needs for the farm systems, whilst also tying into the national requirements and regulation.</p>	<p>Either:</p> <p>1. Amend the definition of Clearance of Indigenous Vegetation;</p> <p>OR</p> <p>2. Delete the definition;</p> <p>AND</p> <p>3. Any consequential amendments required as a result of the relief sought.</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Federated Farmers	182.9	Definitions	Definitions	Cultivation	Seeks to 1. Amend the definition of 'Cultivation' to better fit the process of cultivation, that better represents the process occurring in the district.	1. Delete the notified definition of Cultivation and replace with a new definition as follows: <i>Cultivation:</i> <u>means any process that involves the turning or tilling the land. It can include:</u> <ul style="list-style-type: none"> • <u>Pasture renewal</u> • <u>Cropping (such as maize)</u> • <u>Intensive farming (such as commercial vegetable growing)</u>
						OR 2. Words to similar effect; AND 3. Any consequential amendments required as a result of the relief sought.
Federated Farmers	182.10	Definitions	Definitions	Earthworks	Delete definition of Earthworks as this definition is already well covered in the proposed amendments by the submitter to 'Ancillary Rural Earthworks'.	1. Delete the definition of Earthworks . AND 2. Any consequential amendments required as a result of the relief sought.
Federated Farmers	182.11	Definitions	Definitions	Farm Quarry	Supports this definition.	Retain as notified.
Federated Farmers	182.12	Definitions	Definitions	Fertiliser	Supports this definition.	Retain as notified.
Federated Farmers	182.13	Definitions	Definitions	Intensive Indoor Primary Production	Seeks deletion of definition of 'Intensive Primary Production', as this can be defined within the definition of 'Intensive Primary Production'.	Delete the definition for Intensive Indoor Primary Production ; AND Instead include within the definition of 'Intensive Primary Production'.
Federated Farmers	182.14	Definitions	Definitions	Intensive Outdoor Primary Production	Seeks to deletion definition of 'Intensive Outdoor Primary Production' as it can be defined within the definition of 'Intensive Primary Production'	Delete definition for Intensive Outdoor Primary Production ; AND Instead include within the definition of 'Intensive Primary Production'.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Federated Farmers	182.15	Definitions	Definitions	Intensive Primary Production	<p>Seeks a broader definition of 'Intensive Primary Production', encompassing Intensive Indoor Primary Production; Intensive Outdoor Primary Production; and Intensively Farmed Stock.</p> <p>Opposes the inclusion of feeding 'supplementary feed during adverse weather events such as drought or snow'. Supplementary feed in an adverse weather event is critical for stock welfare.</p> <p>The summary of .2 misses key points, the proposed definitions could have unintended consequences such as capturing dairy grazing bulls which are not seen as intensively farmed animals, or dry cattle stock on nonirrigated land.</p> <p>[Refer to original submission for full details].</p>	<p>1. Delete the notified definition of Intensive Primary Production and replace with a new definition as follows:</p> <p>Intensive Primary Production <i>Refers to any of the following:</i></p> <p><i>(a) commercial livestock kept and fed permanently in buildings or indoor enclosures on a particular site, where the stocking density precludes the maintenance of pasture or ground cover (e.g., pig farming);</i></p> <p><i>(b) Land and buildings used for the commercial boarding and/or breeding of cats, dogs and other domestic cove€(c) farming of mushrooms or other fungi;</i></p> <p><i>(d) dairy cattle, including cows, that are being milked on irrigated €d;</i></p> <p><i>(e) Intensive winter grazing, that does not follow council rules.</i></p> <p>AND</p> <p>2. Any consequential amendments required as a result of the relief sought.</p>
Federated Farmers	182.16	Definitions	Definitions	Light Sensitive Area	<p>Considers the definitions of 'Light Sensitive Areas' is clear, concise and easy to understand. But considers it appropriate to include farms as excluded from Light sensitivity for purpose of primary production. Submitter also concerned there is light sensitivity for the SNA areas. Farms need light to operate</p>	<p>1. Amend the definition of Light Sensitive Area as follows:</p> <p><i>Includes land in the following areas outside of the Port Zone unless the land is needed for primary production, including but not limited to dairy sheds, pest control, rural aviation needs, security, harvesting of crops, primary production needs where seen fit, whist taking into consider the overlays:</i></p> <p><i>a. Wāhi tapu, Wāhi taoka and Wai taoka Overlays</i></p>
					<p>safely and conduct their business (e.g., harvesting). Opposes the inclusion of SNA in this definition.</p> <p>[Refer to original submission for full details].</p>	<p><i>b. Significant Natural Areas Overlay</i></p> <p><i>c. Outstanding Natural Landscapes Overlay</i></p> <p><i>d. Visual Amenity Landscape Overlay</i></p> <p><i>e. the Rural Lifestyle Zone; and</i></p> <p><i>f. the Natural Open Space Zone.</i></p> <p>AND</p> <p>2. Any consequential amendments required as a result of the relief sought.</p>
Federated Farmers	182.17	Definitions	Definitions	National Grid Subdivision Corridor	<p>Supports in part the inclusion of these as means of safety for lines maintenance. Request council to be cautious and not to extend these corridors any further than what is minimally necessary, especially on private property.</p>	<p>Retain as notified.</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Federated Farmers	182.18	Definitions	Definitions	National Grid Yard	Considers the definition is not consistent with NZECP34 Code of Practice for Electrical Safe Distances, particularly Section 2.4.1 around support structures. The National Grid runs over private property, and farmers will be affected by any regulation that exceeds the Code. [Refer to original submission for full details].	1. Amend the definition of ' National Grid Yard ' as follows: <i>means, as depicted in Diagram 1:</i> <i>the area located within 10m 8m of either side of the centreline of an above ground 110kV electricity transmission line on single poles;</i> [...] AND 2. Any consequential amendments required as a result of the relief sought.
Federated Farmers	182.19	Definitions	Definitions	Non-Intensive Primary Production	Supports this definition.	Retain as notified.
Federated Farmers	182.20	Definitions	Definitions	Plantation Forestry	Submitter recognises this is the definition from the National Environmental Standards for Plantation Forestry. The 1ha minimum will mean that farm forestry is inappropriately captured when it is only part of an existing farm and could lead to farm forestry becoming restricted by CE-R2 for the Coastal Environment and viewed as an activity that is incompatible with the landscape values. Farm forestry is distinct from large scale forestry where whole properties are forested. Farm forestry should be recognised as consistent with the amenity of the rural zones. Support is given for shelterbelts and soil conservation planting being excluded from the definition of 'Plantation Forestry'.	1. Amend the definition of Plantation Forestry as follows: <i>means a forest deliberately established for commercial purposes, being:</i> <i>at least 1 ha 50ha of continuous forest cover of forest species that has been planted and has or will be harvested or replanted; and</i> [...] AND 2. Any consequential amendments required as a result of the relief sought.
Federated Farmers	182.21	Definitions	Definitions	New	Notes that the National Policy Statement for Highly Productive Land came into force on 12 October 2022 and contains an appropriate definition for land-based primary production.	1. Add a definition for Land-based Primary Production as defined in the National Policy Statement for Highly Productive Land 2022 into the District Plan. AND 2. Any consequential amendments required as a result of the relief sought.
Federated Farmers	182.22	Definitions	Definitions	Quarry	Considers it is appropriate that 'Farm Quarries' are excluded and there is cross reference between the definitions.	1. Amend the definition of Quarry to specifically exclude farm quarries and their activities. AND 2. Any consequential amendments required as a result of the relief sought.
Federated Farmers	182.23	Definitions	Definitions	Quarrying Activities	Considers it is appropriate that 'Farm Quarries' are excluded and there is cross reference between the definitions.	1. Amend the definition of Quarrying Activities to specifically exclude farm quarries and their activities. AND 2. Any consequential amendments required as a result of the relief sought.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Federated Farmers	182.24	Definitions	Definitions	Reverse Sensitivity	Supports this definition. As this is an important resource management issue for the submitter and the definition is an accurate description.	1. Retain as notified; OR 2. Words of the same intent; AND 3. Any consequential amendments.
Federated Farmers	182.25	Definitions	Definitions	Riparian Margin	Considers the definition of 'Riparian Margin' is too prescriptive. Request the council follow the Landcare report to the Tasman District Council in 2021. This report outlines riparian margin setback of between 10-20 metres. Also, it is important to state that Natural Character-P2(6) states that riparian margins provide a buffer from activities that may adversely affect the natural character values of the river or wetland. Unsure why the district council requires/needs another 100m buffer. [Refer to original submission for full reason]	1. Amend the definition of Riparian Margin as follows: <i>means land that is within:</i> <i>10m of the bank of that part of a river that is up to 3m wide (and is not listed in (c) below); and/or</i> <i>20m of the bank of that part of a river that is greater than 3m wide (and is not listed in (c) below); and/or</i> <i>20m 100m of the banks of the Rangitata; Ōpihi; and Ōrāri Rivers <u>and of any wetland.</u></i> <i>50m of any wetland.</i> AND 2. Any consequential amendments required as a result of the relief sought.
Federated Farmers	182.26	Definitions	Definitions	Riparian Zone [in relation to a river or lake]	Opposes this definition as it is not included anywhere in the proposed district plan.	Delete the definition of Riparian Zone .
Federated Farmers	182.27	Definitions	Definitions	Shelter Belt	Considers the definition of Shelter Belt should acknowledge the ecological importance that shelter belts bring to biodiversity. They create habitats for fauna (e.g., tui, korimako, insects etc). Shelter belts are also a key requirement for animal welfare. The submitter supports the inclusion of definitions for 'shelter belt' in the proposed district plan. The definition is clear, concise, and easy to understand. It would be appropriate to add to acknowledge the ecological importance that shelter belts bring to biodiversity. They create habitats for fauna (eg tui, korimako, insects etc). In times of drought these can also be used as feed, whilst protecting crops from extreme weather, increasing yields. Shelter belts are also a key requirement for animal welfare. It would be appropriate for the definition to be amended to acknowledge these considerations.	1. Amend the definition of Shelter Belt as follows: <i>means any trees planted primarily to provide shelter for stock, crops, <u>creating ecological habitats for insects, providing a food source in drought-like events</u>, or buildings from the prevailing wind(s), or <u>extreme climatic events</u>. Shelter belts are no greater than 30 meters in width and are not clear felled (unless the clear <u>if is</u> for replanting of a new shelterbelt, <u>or for purposes such as health and safety for the farm</u>).</i> AND 2. Any consequential amendments required as a result of the relief sought

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Federated Farmers	182.28	SD - Strategic Direction	Objectives	SD-O1 Residential Areas and Activities	Support the directions set in the strategic overview and limited rural lifestyle development opportunities encroaching on rural land. This ensure that farmland is protected, and urban areas are better developed/ planned. The council needs to acknowledge that there needs to be protection from urban sprawl on highly productive land.	Amend SD-O1 Residential Areas and Activities as follows: [...] <i>ii. limited rural lifestyle development opportunities are provided where they concentrate and are attached to existing urban areas, achieve coordinated pattern of development and are capable of efficiently connecting to reticulate sewer and water infrastructure, <u>while recognising the productive capabilities of the soils and location.</u></i>
						AND Any consequential amendments required as a result of the relief sought.
Federated Farmers	182.29	SD - Strategic Direction	Objectives	SD-O2 The Natural and Historic Environment	Supports this objective.	Retain as notified.
Federated Farmers	182.30	SD - Strategic Direction	Objectives	SD-O5 Mana Whenua	Acknowledges the role tangata whenua play and often lead for outcomes for the district. We suggest minor amendments to the objectives to recognise that involvement of iwi and hapu alongside communities will enable better outcomes for the district. It is important for the council to recognises that many of these sites of significance are on private property and that tangata whenua, cannot use private property as an access-way to these sites and areas of significance. These are working properties and farmers must take into consideration the animal welfare, health and safety of the business they are running. Relationships to develop accessways need to be between the private landowner and hapu, this is something that cannot be created or forced by council. We strongly urge the council to allow these relationships to be created.	Amend SD-O5 Mana Whenua The mana whenua status as follows: [...] <i>iii. <u>the values of identified sites and areas of significance to Kāti Huirapa are recognised and protected Kāti Huirapa retains, and if appropriate, agreed to by private landowners, the ability to enhance access to their sites and areas of significance. Kāti Huirapa recognises many of these are on private land and must form relationships between landowner and hapu on a case-by- case basis. Kāti Huirapa recognises that accessway may be denied for health and safety or animal welfare by the landowner, access is a privilege, not a right.</u></i>
						AND Any consequential amendments required as a result of the relief sought.
Federated Farmers	182.31	SD - Strategic Direction	Objectives	SD-O9 Rural Areas	Supports the recognition of the importance of the primary production sector and the need to protect highly protective soils from inappropriate development. Seeks the inclusion of an additional objective to recognise the importance of providing for and supporting land practice change to address biosecurity, climate, and environmental demands both from regulation and consumer demand.	Amend SD-O9 Rural Areas as follows: [...] <i>vii <u>Primary production activities are supported by Council to adapt to change required by regulatory and consumer demands</u></i> OR Wording with a similar intent; AND Any consequential amendments required as a result of the relief sought.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Federated Farmers	182.32	UFD - Urban Form and Development	General	General	Generally supports this chapter of the proposed district plan as drafted.	1. Retain the chapter with the approach of minimising the loss of versatile soils; OR 2. wording with a similar intent; AND 3. Any consequential amendments required as a result of the relief sought.
Federated Farmers	182.33	NH - Natural Hazards	General	General	Supports the accurate mapping of the flood and coastal hazard areas and would expect engagement to occur to the relevant impacted. Support the precautionary approach in respect of natural hazards. The approach taken by the Council is consistent with regional and national policy documents as well as internationally. Supports the approach proposed that focus will be placed on vulnerable activities (e.g., liveable dwellings) and these activities that will have the more stringent plan controls placed on them. Supports enabling non-liveable farm ancillary buildings as permitted activities within the natural hazard areas as long this has been clearly communicated to the landowners along with the associated risks of doing so.	1. Federated Farmers seeks the following relief: (a) the retention of the overview as currently drafted or wording with similar effect; and (b) any consequential amendments required as a result of the relief sought.
Federated Farmers	182.34	NH - Natural Hazards	Objectives	NH-O1 Areas subject to natural hazards	Supports this objective.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.35	NH - Natural Hazards	Objectives	NH-O2 Regionally Significant Infrastructure	Supports this objective.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.36	NH - Natural Hazards	Objectives	NH-O3 Natural hazard mitigation works	Supports this objective.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Federated Farmers	182.37	NH - Natural Hazards	Policies	NH-P1 Identification of natural hazards and approach to management within Natural Hazard Areas	Supports this policy.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.38	NH - Natural Hazards	Policies	NH-P2 Consideration of tsunami risk	Supports this policy.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.39	NH - Natural Hazards	Policies	NH-P3 Role of natural features and vegetation	Supports this policy.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.40	NH - Natural Hazards	Policies	NH-P4 Subdivision, use and development in Flood Assessment Areas, excluding high hazard areas and overland flow paths	Supports this policy.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.41	NH - Natural Hazards	Policies	NH-P5 Subdivision and Regionally significant infrastructure in Liquefaction Awareness Areas	Supports this policy.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.42	NH - Natural Hazards	Policies	NH-P6 Subdivision and Regionally Significant Infrastructure	Supports this policy.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Federated Farmers	182.43	NH - Natural Hazards	Policies	NH-P7 Slope stability and subsidence risk	Supports this policy.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.44	NH - Natural Hazards	Policies	NH-P8 Overland Flow Paths	Supports this policy.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.45	NH - Natural Hazards	Policies	NH-P9 Natural hazard mitigation works	Supports this policy.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.46	NH - Natural Hazards	Policies	NH-P10 High Hazard Areas	Supports this policy.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.47	NH - Natural Hazards	Policies	NH-P11 Regionally Significant Infrastructure	Supports this policy.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.48	NH - Natural Hazards	Rules	NH-R1 Earthworks, excluding land disturbance and for natural hazard mitigation works	Supports this rule.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Federated Farmers	182.49	NH - Natural Hazards	Rules	NH-R2 Fences	Supports this rule.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.50	NH - Natural Hazards	Rules	NH-R3 Natural hazard Mitigation works - maintenance, replacement and upgrading	Supports this rule.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.51	NH - Natural Hazards	Rules	NH-R4 Natural hazard sensitive activities or structures and additions to such activities or structures with a ground floor area of 30m ² or more	Supports this rule.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.52	NH - Natural Hazards	Rules	NH-R5 Regionally Significant Infrastructure - maintenance, replacement and upgrading	Supports this rule.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.53	NH - Natural Hazards	Rules	NH-R6 Regionally Significant Infrastructure - New NH-R6.1 does not apply if: [...]	Supports this rule.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Federated Farmers	182.54	NH - Natural Hazards	Rules	NH-R7 Natural Hazard Sensitive Activities and additions, new buildings, and structures with a ground floor area of less than 30m ² (excluding Regionally Significant Infrastructure)	Supports this rule.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.55	NH - Natural Hazards	Rules	NH-R8 Subdivision 1 Flood Assessment Area	Supports this rule.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.56	NH - Natural Hazards	Rules	NH-R9 Natural hazard mitigation works, including associated earthworks -New	Supports this rule.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.57	HS - Hazardous Substances	General	General	Supports the precautionary approach in respect of natural hazards as proposed by the Council and that the focus will be placed on vulnerable activities (e.g., liveable dwellings) and it will be these activities that will have the more stringent plan controls placed on them. Supports enabling non-liveable farm ancillary buildings as permitted activities within the natural hazard areas as long as this has been clearly communicated to the landowners along with the associated risks of doing so.	1. Retain the Chapter as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.58	HS - Hazardous Substances	Objectives	General	Supports objectives HS-O1 to HS-O3 as currently drafted. In particular, we support objective HS-O3 which recognises that there may be a functional need for new infrastructure to be located within identified hazard areas. [NB there is no HS-O3 and the second part seems unrelated to HS-O1 and HS-O2]	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Federated Farmers	182.59				Submission point deleted due to duplication, please refer to submission point 182.58.	Please refer to submission point 182.58.
Federated Farmers	182.60	HS - Hazardous Substances	Policies	General	Submitter supports policies HS-P1, HS-P2, HS-P3 and HS-P4.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.61				Submission point deleted due to duplication, please refer to submission point 182.60.	Please refer to submission point 182.60.
Federated Farmers	182.62				Submission point deleted due to duplication, please refer to submission point 182.60	Please refer to submission point 182.60.
Federated Farmers	182.63				Submission point deleted due to duplication, please refer to submission point 182.60.	Please refer to submission point 182.60.
Federated Farmers	182.64	HS - Hazardous Substances	Rules	HS-R1 Use and/or storage of hazardous substances in a hazardous facility (excluding Major Hazard Facilities)	Supports this rule.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Federated Farmers	182.65	HS - Hazardous Substances	Rules	HS-R4 New Major Hazard Facilities and additions to Major Hazard Facilities	Supports this rule.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.66	HH - Historic Heritage	Introduction	General	Considers that the Council is using regulatory methods as a means to manage historic heritage without the non-regulatory methods supporting in the background. Landowner engagement and education should be the first approach to the effective. Only inappropriate activities that could cause more than minor effects on heritage and cultural values should be managed. Existing use rights of lawfully established activities also need to be recognised and protected.	1. Amend the overview section to the Historic Heritage chapter to: <ul style="list-style-type: none"> - promote the use of non-regulatory methods; - ensure that historic heritage will be protected from inappropriate subdivision, use and development. AND 2. Any consequential amendments required as a result of the relief sought.
Federated Farmers	182.67	HH - Historic Heritage	Objectives	General	Supports the objectives of the Historic Heritage Chapter.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.68	HH - Historic Heritage	Policies	General	Supports the policies of the Historic Heritage chapter noting the balance between land use and heritage values.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.69	HH - Historic Heritage	Rules	HH-R1 Maintenance, repair or internal alterations of a Historic Heritage Item	Supports this rule.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.70	HH - Historic Heritage	Rules	HH-R2 Temporary buildings and structures within a heritage setting	Supports this rule.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Federated Farmers	182.71	HH - Historic Heritage	Rules	HH-R3 New buildings, structures and signs within a heritage setting	Supports this rule.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.72	HH - Historic Heritage	Rules	HH-R4 Earthworks within heritage settings	Supports this rule.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.73	HH - Historic Heritage	Rules	HH-R5 External strengthening of a Historic Heritage Item	Supports this rule.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.74	HH - Historic Heritage	Rules	HH-R10 Subdivision of land containing a Historic Heritage Item	Opposes HH-R10 which restricts the subdivision of land where a heritage site and value is present. The submitter considers this over regulatory. For the council to restrict development if it will benefit the historical area. Private landowners should have the rights to subdivide land which will enhance an area. [Refer to original submission for full reason]	1. Delete HH-R10 ; AND 2. Any consequential amendments.
Federated Farmers	182.75	HH - Historic Heritage	Rules	HH-R16 Subdivision of land within a Historic Heritage Area	Opposes HH-R16 which restricts the subdivision of land where a heritage site and value is present. The submitter considers this over regulatory. For the council to restrict development if it will benefit the historical area. Private landowners should have the rights to subdivide land which will enhance an area. [Refer to original submission for full reason]	1. Delete HH-R16 ; AND 2. Any consequential amendments.
Federated Farmers	182.76	TREES - Notable Trees	Introduction	General	Supports the recognition and identification of notable trees but if these are located on private land engagement between the Council and landowners needs to occur so the tree is best managed for future generations. This can be regulatory and non-regulatory methods.	1. Amend TREES - Notable Trees chapter overview by adding a sentence regarding the need for engagement to occur between the Council and landowners over how best to achieve the protection of notable tree or trees. AND 2. Any consequential amendments required as a result of the relief sought.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Federated Farmers	182.77	TREES - Notable Trees	Rules	TREES-R3 New activity and development within the root protection area of a notable tree	Supports in part Rule TREES-R3 but it does not provide for mechanical cultivation within the rootzone of notable trees as a permitted activity. Also the term 'tree protection zone' should be used instead of the rootzone area. It can easily be calculated by (a) canopy drip line + 1m; (b) trunk diameter at 1.4m height multiplied by 12; and (c) tall narrow trees = ½ x Height. [Refer to original submission for full reason]	1. Amend TREES-R3 New activity and development within the root protection area of a notable tree as follows: Activity status: Permitted Where: PER-1 <i>The activity or development is not for any of takes into consideration <u>The Tree Protection Area of notable Tree or Trees while</u> the following <u>could occur</u>;</i> 1. any earthworks including trenching; or 2. establishment of new impervious surface; or 3. new buildings, <u>with consent</u> ; 4. new structures including fences and signs, (temporary and permanent) OR 2. Wording with similar effect; AND 3. Any consequential amendments required as a result of the relief sought.
Federated Farmers	182.78	Planning Maps	SASM Overlay		Considers mapping large areas, if not whole farms is inappropriate, if specific detail cannot be supplied to landowner.	Provide landowners with specific detail on where the SASM are located, how big it is and what this site was used for.
Federated Farmers	182.79	SASM - Sites and Areas of Significance to Māori	General	General	Supports the identification and protection of wāhi tapu, wāhi tapu and sites and areas of significance to Māori. Landowners should have more say in matters such as these as they are not someone with greater rights than those of the general public when it comes to their land. Council needs to provide sufficient information to landowners on the location and extent of sites or areas of Significance to Māori on their property so t they are aware of any restrictions that apply, and any obligations that they may have. There are also concerns around access to private property to the sites of significance. Property rights need to be recognised and respected. It is important that relationships are formed on a private landowner and Kati Huirapa scale. There needs to be an understanding of access when and where, otherwise illegal access could be seen as trespassing. [Refer to original submission for full reason]	1. Amend the SASM - Sites and Areas of Significance to Māori chapter to: a) recognise the role that landowners of private property have to play in the identification and protection of sites and areas of significance to Māori; AND b) state that the Council will play a major role in facilitating an enduring relationship and promoting effective engagement between tangata whenua, landowners and the Council in the identification and protection of sites and areas of significance to Māori. AND 2. Any consequential amendments required as a result of the relief sought.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Federated Farmers	182.80	SASM - Sites and Areas of Significance to Māori	General	General	Supports the need for protection of Sites and Areas of Significance to Māori that have been identified with precision. Supportive of measures agreed upon by the landowners for Kāti Huirapa having access to significant sites for cultural purposes, within reason. However, there are concerns that the objectives and policies do not provide for existing activities to continue. There needs to be recognition and provision for existing activities such as grazing and other farming activities to continue as long as the scale and intensity of effects do not/have not increased following the commencement date of the plan. [Refer to original submission for full reason]	1. Add a new policy to the SASM-Site and Areas of Significance to Māori chapter as follows: <u>SASM-PX</u> <u>Provide recognition for grazing and farming activities that have not increased in their scale or intensity of effects from commencement date of the plan.</u> OR 2. With wording to similar effect; AND 3. Any consequential amendments required as a result of the relief sought.
Federated Farmers	182.81	SASM - Sites and Areas of Significance to Māori	Objectives	SASM-O1 Decision making	Decision making in/around the sites of significance can be far overreaching and invasive to farm operations. It is important to recognise the intergenerational view that farmers hold in protecting their land for future generations. Many farmers in the district have farmed the same land for more than 150 years. Landowners appreciate the creation of enduring relationships, recognised as a directly affected party hosting wider benefit resources, not just someone with no greater rights than those of the general public. [Refer to original submission for full reason]	1. Amend SASM-O1 Decision making Kāti Huirapa as follows: <i>Kāti Huirapa are actively involved in decision making that affects the values of the identified Sites and Areas of Significance to Kāti Huirapa, <u>not extending to existing use rights, the value of landowners' land, and only when required at no cost to the landowner.</u></i> AND 2. Any consequential amendments required as a result of the relief sought.
Federated Farmers	182.82	SASM - Sites and Areas of Significance to Māori	Objectives	SASM-O2 Access and use	Submitter is concerned about access through private property to the sites of significance. Property rights need to be recognised and respected. Access to these sites on private property should be via consultation and permission of the landowner, rather than council applying regulatory methods that create reactive environments for farmers to operate in. The council needs to acknowledge the effort that farmers put into the protection of their land/resources for future generations and to provide detail specific on where the sites are located, how big it is, and what it was used for. Federated Farmers acknowledges the need to access these sites for maintenance and for cultural needs. However, we stress that it is important to acknowledge that many of these sites reside on large scale working farms. Access to these sites on private property can only be via consultation and permission of the landowner. Relationships need to be developed, rather than council applying regulatory methods that create reactive environments for farmers to operate in.	1. Amend SASM-O2 Access and use as follows: <i>Kāti Huirapa are able to access <u>if appropriate agreed to by private landowner, the ability to maintain and use resources and areas of cultural values within the identified Sites and Areas of Significance, access to sites that need to be identified in detail to landowners.</u> Kāti Huirapa, <u>following health and safety of the landowner, whilst not disturbing the welfare of animals and farm operations.</u></i> AND 2. Any consequential amendments required as a result of the relief sought.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
					<p>The council needs to acknowledge the effort that farmers put into the protection of their land/resources for future generations. Council also needs to provide landowners with detail specific on where the site are located, how big is it, and what this site was used for. Mapping large areas, if not whole farms is inappropriate, if specific detail cannot be supplied to landowner.</p> <p>[Refer to original submission for full reason]</p>	
Federated Farmers	182.83	SASM - Sites and Areas of Significance to Māori	Objectives	SASM-O3 Protection of Sites and Areas of Significance	<p>Considers that SASM should not affect the existing use rights of landowners and their operations on the farm. Climate Change is an issue that is going to affect the district in various of ways. Māori have made it clear that they need environments to become resilient to protect their cultural and historical values. To recognise the issue of climate change will give landowners an option to better mitigate the effects of this under the proposed plan.</p>	<p>1. Amend SASM-O3 Protection of Sites and Areas of Significance as follows: <i>The values of identified areas and sites of significance to Kāti Huirapa are recognised and protected from inappropriate subdivision, use and development <u>unless it fits within the existing rights of the landowner, or as a mitigation to the effects of climate change.</u></i></p> <p>AND</p> <p>2. Any consequential amendments required as a result of the relief sought.</p>
Federated Farmers	182.84	SASM - Sites and Areas of Significance to Māori	Policies	SASM-P1 Involvement of Kāti Huirapa in resource management decisions	<p>Acknowledges Māori as first people of the land. Acknowledges that these are significant sites but urge caution to allowing Chieftdom to be exercised on private property without consultation or consent from landowners. Relations to be proactive than reactive due to council regulation.</p> <p>If land is not identified accurately and site specifically, it should not be classified as SASM and this is counterproductive to the formation of relationships when this is whole private properties.</p> <p>[Refer to original submission for full reason]</p>	<p>1. Amend SASM-P1 Involvement of Kāti Huirapa in resource management decisions as follows: <i>Work with Kāti Huirapa to identify and list Sites and Areas of Significance to Kāti Huirapa in SCHED6- Schedule of Sites and Areas of Significance to Kāti Huirapa, and recognise <u>and provide for the with landowners in consultation with the identified sites and areas, managing the resources inside that site in relationship building.</u></i></p> <p><i>Exercise of rangitiratoka by Kāti Huirapa in decisions made in relation to these sites and areas.</i></p> <p>AND</p> <p>2. Any consequential amendments required as a result of the relief sought.</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Federated Farmers	182.85	SASM - Sites and Areas of Significance to Māori	Policies	SASM-P2 Consultation and engagement with Kāti Huirapa	Supports the policy and considers that developing protocols and key contact people will give landowners some confidence when wanting to conduct activities near SASM. Consultation should be outside a council setting away from bureaucracy, and the basis should be developed on an individual relationship between hapu and landowner.	<p>1. Amend SASM-P2 Consultation and engagement with Kāti Huirapa as follows:</p> <p><i>Encourage and facilitate consultation and engagement between landowners and applicants with Kāti Huirapa, prior to applying for consent and/or undertaking activities within or adjacent to the identified site and areas listed in SCHED6- Schedule of Sites and Areas Significant to Kāti Huirapa, as being the most appropriate way to obtain understanding of the potential impact of any activity on the site of area. <u>To establish a schedule of key hapū / tangata whenua representatives who will be notified of, or consulted on, applications received for subdivision consents or resource consents relating to proposals affecting or potentially affecting wāhi tapu, wāhi taonga, or site(s) of significance.</u></i></p> <p>AND</p> <p>2. Any consequential amendments required as a result of the relief sought.</p>
Federated Farmers	182.86	SASM - Sites and Areas of Significance to Māori	Policies	SASM-P3 Use of sites and areas for cultural practices	Supports the policy and considers that developing protocols and key contact people will give landowners some confidence when wanting to conduct activities near sites.	<p>1. Retain as notified;</p> <p>OR</p> <p>2. Wording with similar effect;</p> <p>AND</p> <p>3. Any consequential amendments.</p>
Federated Farmers	182.87	SASM - Sites and Areas of Significance to Māori	Policies	SASM-P4 Cultural access	Supports this policy as it stands. Putting aside any issues with the accuracy of the schedule it is important to ensure the rules are linked to SASM-SCHED6 to provide certainty and focus limited resources. Landowners will prefer a direct relationship with local Rūnanga, and the submitter is aware of very positive relationships where both parties have an interest in an area of land and have negotiated directly with outcomes that suit both. Council is often an unnecessary intermediary party in some cases.	<p>1. Retain as notified;</p> <p>OR</p> <p>2. Wording with similar effect;</p> <p>AND</p> <p>3. Any consequential amendments.</p>
Federated Farmers	182.88	SASM - Sites and Areas of Significance to Māori	Policies	SASM-P5 Protection of values of Sites and Areas of Significance to Kāti Huirapa	<p>Supports this policy as it stands but seeks amendments. Landowners need to be included in conversations and decisions regarding the SASM on their lands. These sites need to be protected however it needs to be a conversation between the local tangata whenua and landowners, not council. As intergenerational landowners it adds more importance to the legacy they leave when land is passed down.</p> <p>[Refer to original submission for full reason]</p>	<p>1. Amend SASM-P5 Protection of values of Sites and Areas of Significance to Kāti Huirapa as follows:</p> <p>[...]</p> <p>3. <i>Maintenance of enhancement of access by whanau for customary use and cultural purpose, <u>if on private land in agreement with the landowner;</u></i></p> <p>[...]</p> <p>AND</p> <p>2. Any consequential amendments required as a result of the relief sought.</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Federated Farmers	182.89	SASM - Sites and Areas of Significance to Māori	Policies	SASM-P6 Protecting cultural values in wāhi tūpuna areas	Seeks that rules are linked to SASM-SCHED6 to provide certainty and focus limited resources. Protection of these sites for cultural values needs to be not funded by the private landowners, adequate funds need made available to ensure that these sites that are pinpoint identified can be protected. Submitter asks the council to recognise that farms still need to be able to operate economically around these SASM's. [Refer to original submission for full reason]	1. Amend SASM - P6 Protecting cultural values in wāhi tūpuna areas as follows: <i>Recognise the significance to Kāti Huirapa of the wāhi tūpuna areas listed in SCHED6 - Sites and Areas of Significance to Kāti Huirapa and protect the identified values of these areas by avoiding significant adverse effects of activities in, or in close proximity to, wāhi tūpuna areas on the connections of Kāti Huirapa to these areas and the ability of the areas to support taoka species and mahika kai, unless there is already a pre-existing use of the land which has minimal or no effect on the site. Existing use is always taken into consideration when protecting the sites.</i> AND 2. Any consequential amendments required as a result of the relief sought.
Federated Farmers	182.90	SASM - Sites and Areas of Significance to Māori	Policies	SASM-P7 Sustainability of ecosystems that support taoka and mahika kai	Support the SASM - P7 but seek that once an exact location is established it can be protected and enhanced for future generations to enjoy. Urge this be done in collaboration with the landowner and hapu, as relationships can be formed in the protections of SASM'. Council should make available funds to protect these sites as it should not be something that comes at the cost of the private landowner. Non-regulatory methods should be the preference. [Refer to original submission for full reason]	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.91	SASM - Sites and Areas of Significance to Māori	Policies	SASM-P8 Protection of wāhi taoka, wāhi tapu, wai taoka and wai tapu sites and areas	Considers non-regulatory methods should be the preference, not the regulatory consent application framework. Accidental discovery of unrecorded heritage or cultural sites can be worrying for landowners including unknown costs and time delays. Councils could offer to waive a resource consent fee in the event of accidental discovery of a heritage site during works, and a cost-share arrangement for an archaeological or cultural impact assessment. [Refer to original submission for full reason]	1. Amend SASM-P8 Protection of wāhi taoka, wāhi tapu, wai taoka and wai tapu sites and areas as follows: <i>[...]</i> 2. <i>an accidental discovery protocol is prepared and adopted for any earthworks and assist resource users conducting activities near recorded sites and in the event of a discovery of unrecorded sites.</i> AND 2. Any consequential amendments required as a result of the relief sought.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Federated Farmers	182.92	SASM - Sites and Areas of Significance to Māori	Rules	SASM-R1 Earthworks not including quarrying and mining	Concerns that the policy seeks to restrict certain activities and farm practices on private property. As written, the permitted activities under this rule will stifle farm management and growth, create conditions which put the health and safety of those on the farm at risk, as well as stock. The submitter opposes any rules in the wāhi tapu and wai tapu overlays unless areas can be more clearly identified. The permitted activity 1 proposed creates unworkable condition for earthworks around new/existing structures. Many heritage woolshed/farm sheds from colonial era have a square footage including yards of greater than 750m2. [Refer to original submission for full reason]	1. Amend SASM-R1 Earthworks not including quarrying and mining as follows: [...] PER-1: <i>The activity is either:</i> <ol style="list-style-type: none"> 1. earthworks, including those associated with and under new buildings/structures and those necessary for the installation of infrastructure/ utilities, do not exceed a maximum area of 750m² 1000m², <i>recognising the needs of rural structures;</i> 2. earthworks for the purpose of maintaining existing roads, tracks, or natural hazard mitigations works, and area within the footprint or modified ground comprised by existing road, track, <i>animal welfare needs</i>, or natural hazard mitigation works; [...] AND 2. Any consequential amendments required as a result of the relief sought.
Federated Farmers	182.93	SASM - Sites and Areas of Significance to Māori	Rules	SASM-R2 Buildings and structures, including additions and alterations to existing buildings and structures and network utilities	Concerned about the added regulation that seeks to restrict farm activities. Without definitive locations in the wāhi taoka overlay, the rules are detrimental to the operations of a farm. Go back to Kāti Huirapa and ask for clarification on where sites are. This gives farmers a better idea on what to protect and work with Kāti Huirapa to put protections, enhance the area, and create relationships with Kāti Huirapa. [Refer to original submission for full reason]	a) Amend SASM-R2 as follows: SASM-R2 Buildings and structures, including additions and alterations to existing buildings and structures and network utilities 1. Wāhi taoka Overlay Activity status: Permitted Where: PER-1. <i>For buildings or structures located outside of the residential zones, Commercial and mixed-use zones, Industrial zones or Port Zone, the following limitations apply:</i> <ol style="list-style-type: none"> 1. The maximum height of buildings and structures does not exceed 5m 10m above ground level; and 2. Buildings and structures are not located within 20m vertical or 100m horizontal of any ridgeline, <i>unless it is pre-existing structure, or a new structure with little to no impact on the aesthetics of the environment</i> and 3. Buildings and structures are not located at any point above 900m 1100m above sea level; and 4. The maximum footprint of any building or structure does not exceed 300m². AND b) Any consequential amendments required as a result of the relief sought.

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Federated Farmers	182.94	SASM - Sites and Areas of Significance to Māori	Rules	SASM-R3 Indigenous vegetation clearance	Acknowledges the importance of protecting and conserving native bush for future generations. Many farmers across the district already do so for amenity or ecological purposes. However, the need to remove native bush on land under existing use rights for clearance of regrowth should be provided for.	<p>1. Amend SASM-R3 Indigenous vegetation clearance as follows:</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>[...]</p> <p>PER-6:</p> <p><i>The indigenous vegetation clearance is necessary in the course of removing pest plants and pest animals in accordance with any regional pest management plan or the Biosecurity Act 1993, or where this occurs as part of indigenous biodiversity restoration or enhancement, <u>or exercising existing use rights</u>; or</i></p> <p>[...]</p> <p>AND</p> <p>2. Any consequential amendments required as a result of the relief sought.</p>
Federated Farmers	182.95	SASM - Sites and Areas of Significance to Māori	Rules	SASM-R4 Temporary events	<p>Supports this rule, with the addition of minor changes to reflect property ownership on private land.</p> <p>Submitter acknowledges the importance of cultural events are important to occur, for strengthening bonds, education, and culture among people. To have a blanket rule, without taking into consideration private ownership would be neglectful. The submitter would urge the development of relationships between iwi and local landowners where sites are located.</p>	<p>1. Amend SASM-R4 Temporary events as follows:</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1:</p> <p><i>Any temporary event where this is limited to a cultural event undertaken in accordance with tikanga, <u>if required on private property consent from private landowner is gained prior to the event occurring.</u></i></p> <p>AND</p> <p>2. Any consequential amendments required as a result of the relief sought.</p>
Federated Farmers	182.96	SASM - Sites and Areas of Significance to Māori	Rules	SASM-R5 Mining and quarrying	Considers that farm quarriers are small and are used for on farm purposes that do not have the same impact on the environment as commercial mining operations.	<p>Amend SASM-R5 Mining and quarrying as follows:</p> <p>1. Wāhi tūpuna Overlay</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1:</p> <p><i>The mining and/or quarrying do not exceed a maximum area of 750m2 <u>in commercial mining operations, excluding rural on-farm mines</u> and;</i></p> <p>[...]</p> <p>AND</p> <p>2. Any consequential amendments required as a result of the relief sought.</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Federated Farmers	182.97	SASM - Sites and Areas of Significance to Māori	Rules	SASM-R6 Intensively farmed stock	<p>Seeks the removal of this restriction of land use and management. Seeks the development of a relationship between Rūnanga and private landowners to locate, identify and protect sites, rather than a top-down approach from council.</p> <p>Without the identification of pin-pointed sites of significance, it is impudent to allow for whole farms to have restrictions on their land.</p> <p>Acknowledge the importance to protect former pa sites, rock art bring protected.</p> <p>Intensively farmed stock should not be restricted under the current overlays, until more information has been provided by the runanga, to properly identify the sites of significance.</p> <p>[Refer to original submission for full reason]</p>	Delete SASM-R6 .
Federated Farmers	182.98	SASM - Sites and Areas of Significance to Māori	Rules	SASM-R7 Subdivision	<p>Oppose as it is important to allow small subdivisions to occur on farms. Intergenerational farms need to subdivide to allow the building of an additional dwelling to allow multiple generations to live on the farm. This rule restricts the ability for generations to live alongside one another.</p>	<p>1. Add to SASM-R7 Subdivision as follows: <i><u>Subdivision occurring in rural areas where housing is required on intergenerational farms, farm housing for employees, or as required for the operations for safe farm management housing.</u></i></p> <p>AND</p> <p>2. Any consequential amendments required as a result of the relief sought.</p>
Federated Farmers	182.99	SASM - Sites and Areas of Significance to Māori	Rules	SASM-R8 Shelterbelts or woodlots or plantation forestry	<p>Opposes restrictions of shelterbelts, woodlots, or plantation forestry as this can have implications on farm operations, especially the welfare of stock. We ask for the development of relationships between Rūnanga and private landowners to agree what/type of shelterbelt plantation can occur in the wāhi tapu overlay.</p>	<p>1. Amend SASM-R8 Shelterbelts or woodlots or plantation forestry as follows: <i><u>the addition of shelterbelts for the protection of crops, welfare of animals, creating ecological habitats on farm in consultation with iwi through a relationship to which trees can be planted around these sites of significance.</u></i></p> <p>AND</p> <p>2. Any consequential amendments required as a result of the relief sought.</p>
Federated Farmers	182.100	ECO - Ecosystems and Indigenous Biodiversity	General	General	<p>The submitter notes the tension between landowners, iwi and Council around the preservation of indigenous ecosystems and biodiversity. Considers landowners should view biodiversity as a valuable asset rather than a hindrance. As part of this, it is important that activities such as lambing, calving, shelter, water supply and takes, fencing, access and works for access and fire breaks are permitted throughout the plan.</p> <p>[Refer to original submission for full reason]</p>	<p>1. Retain Objectives of ECO chapter as notified;</p> <p>OR</p> <p>2. Wording with similar effect;</p> <p>AND</p> <p>3. Any consequential amendments.</p>

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary
Federated Farmers	182.101	ECO - Ecosystems and Indigenous Biodiversity	Objectives	General	The submitter supports the objectives ECO-01, ECO-02, and ECO-03 for Ecosystems and indigenous biodiversity.	1. Retain as notified; OR 2. Wording with similar effect; AND 3. Any consequential amendments.
Federated Farmers	182.102				Submission deleted due to duplication, refer submission point 182.101.	Refer submission point 182.101.
Federated Farmers	182.103				Submission deleted due to duplication, refer submission point 182.101.	Refer submission point 182.101.