

Chapter – CE – Coastal Environment

Feed-back No.	Section	Sub-section	Plan Provision	Feedback	Relief sought
93.13	CE – Coastal environment	CE-P3 Identifying coastal hazards		<p><u>Coastal High Hazard (Erosion) Area</u></p> <p>There appears to be a reduction in the extent of the hazard across [REDACTED] with [REDACTED] supporting refinement of the hazard extent based on more accurate information.</p>	
93.12	CE – Coastal environment	CE-P3 Identifying coastal hazards	General	<p><u>Coastal High Hazard (inundation) Overlay</u></p> <p>The Overlay as proposed is unlikely to conflict with [REDACTED] activity now and future changes. [REDACTED] would like to be involved in any discussions or investigations that may change the location or extent of this overlay as it affects [REDACTED]</p>	
141.116	CE – Coastal environment	General		<p>From [REDACTED] review of the online planning maps and discussions with growers in the District – it appears that there is some vegetable growing activity that is located within the CE and HNC areas.</p> <p>Coastal Environment - Objectives and Policies - [REDACTED] support the reference (in CE-O1) to preservation and protection, as well as enabling people and communities to provide for their social, economic and cultural wellbeing and their health and safety. This provides for balanced decision-making.</p> <p>It is also important to recognise within the policy (and take into account in decision making) that parts of the environment are already modified.</p>	Consider in the foregoing
143.50	CE – Coastal environment	General		<p><u>Coastal Environment</u></p> <ul style="list-style-type: none"> Provide framework for managing uses and effects of / on coastal environment, inclusive of character, access and hazards. 	<p><u>Coastal Environment</u></p> <ul style="list-style-type: none"> [REDACTED] are in a neutral position on this section of the Draft Plan. However, it would seek

				<ul style="list-style-type: none"> Placeholder for urban areas (i.e. Timaru) and how hazards to be managed / avoided here. 	clarification or resolution of the placeholder matters to do with urban high coastal hazard matters.
156.2	CE – Coastal environment	General		<p>Matters discussed:</p> <ol style="list-style-type: none"> The mapping of the Coastal High Natural Character Area might be slightly wrong on [REDACTED] property because the line is landward of the Stop bank and on paddocks, which are farmed for dairy cattle and therefore have no natural character. We discussed rules that could have implications for farm operations. Agreed that none of the rules likely to impact on farming because of existing use rights but potential interpretation issues and effectiveness problems identified with CE-10 and CE-12 as follows: <ul style="list-style-type: none"> CE-10 PER-3 applies earthworks limits to whole site (100m² and 100m³) regardless of whether activity is only in a portion of the Coastal High Natural Character Area or even not even in the area. CE-12 Farming that does not involve irrigation is DIS, and while existing use rights enable farming there is a potential jurisdiction overlap with [REDACTED] to which resource consents are held (Farm Management Plans) and it is unclear what we would assess if TDC needed to consider an application to infringe the rule? Mentioned that the Coastal Environment chapter will be reviewed and amended. We discussed setbacks from wetlands – [REDACTED] might have been thinking about setbacks required by [REDACTED] because I could not find a requirement for stock to be setback more than 20m from a wetland in the Draft Plan. Agreed though that in some circumstances a 10m setback could be appropriate. The 	Review Coastal Environment chapter

				important thing is to fence off all wetlands so stock don't have access (but again no rule in the Draft Plan requires that).	
159.2	CE – Coastal environment	General		<p>Coastal Environment – Coastal High Hazard (inundation) Area [REDACTED] the Port playing a significant role in the District's economic wellbeing. It is inherent in the functional operation of sea ports that they are located adjacent to the coast. A significant portion of the Port's landholdings are subject to the proposed Coastal High Hazard area overlay ('the hazard overlay'). [REDACTED] accepts as a general principle that hazard risk should be appropriately identified and mitigated, and is mindful of the potential effects of climate change-induced sea level rise. The need to manage hazard risk does however need to be managed in a contextually appropriate manner and balanced against the functional and operational needs of sea ports to be located adjacent to the coast. The proposed development controls applying to land within the hazard overlay appear to be applied as a 'one size fits all' approach and do not appropriately take into account the functional necessity of the port to be located by the coast. The proposed uniform approach means that the proposed provisions are considered to be unduly onerous and exceed those implemented in other second-generation District Plans for sea ports. Examples of such rules include CE-R6 (NC-1) and NH-R20 which result in regionally significant infrastructure and new buildings and structures and additions to existing buildings/structures being considered as non-complying activities. PrimePort and many of surrounding [REDACTED] tenants (bulk fuel storage) are considered to meet the definition of regionally significant infrastructure, so the proposed regulatory approach essentially makes the ongoing operation and adaption of such infrastructure non-complying, despite there being no plausible alternative locations. The Port can be readily differentiated from other types of strategic infrastructure such as state highways or electricity transmission networks where alternative inland routes may be available. The grave concerns that [REDACTED] holds in regard to the significant controls and restrictions proposed in the draft District Plan cannot be understated. The draft Plan as currently proposed will</p>	<p>Requested outcomes: i. That the proposed policy and rule framework be amended to appropriately recognize the functional and operational necessity of the Port to be located adjacent to the coastline, with the rule package enabling the ongoing use and development of the Port subject to hazard risk being taken into account in design. ii. That further research is undertaken to quantify the extent of the inundation area around the Port which has a unique wave environment comparative to the remainder of the coast.</p>

				<p>compromise development at the Port which has regional and national significance. Therefore, ██████ seek that the Proposed District Plan provides a more contextually appropriate and suitably nuanced approach through providing exceptions for port activities within the hazard overlay as a more effective and efficient method for balancing hazard risk with the functional needs of regionally significant infrastructure. The proposed approach, as applied the Port, does not appear to give effect to the Canterbury Regional Policy Statement ('CRPS') direction regarding the management of natural hazards. CRPS Policy 11.3.1 seeks to avoid development in high hazard areas unless that development is located in an area that is currently zoned for industrial activities, in which case the direction is one of mitigation rather than avoidance. Policy 11.3.4 seeks that new critical infrastructure is to be located outside of high hazard areas, unless there is no reasonable alternative. PrimePort and the surrounds industrial land meets the CRPS definition of 'critical infrastructure' and there is no reasonable alternative for the Port and associated industry to be located away from the coast. In this context Policy 11.3.4 directs that as far as practicable the infrastructure is to be designed such that its integrity and function are able to be maintained during natural hazard events.</p>	
31.1	CE – Coastal environment	General	General	<p>██████████ attended the Workshops on Coastal erosion and Inundation held in the Timaru District Council Chambers on 18 November 2020.</p> <p>In principal we object to adopting the 1.2m SLR to the 1 in 100 year storm event.</p> <p>Our concern is with the proposed inundation levels. Currently the District plan is a 1 in 100 event. This is a realistic adoption for District Plan guidelines and business sustainability. It Appears Council would like to use a 1.2m sea level rise on top of a 1 in 100 year event. This significantly changes the landscape of the businesses in the Washdyke area for an event that may not occur to that extent. The Ministry for the Environment (Fact sheet 7) have suggested that in</p>	

				<p>the last 100 years sea level rise was around 180mm, and they predict a possible sea level rise to 200-400mm in the following 100 years. Furthermore in 2014 the Intergovernmental Panel on Climate Change (IPCC) projected a sea level rise of 300mm and 1000mm (from 1995 data) projected sea water level to 2100. Over a shorter timeframe up to 2060 they suggest 200-400mm sea level rise.</p> <p>Given Timaru District Council is legislatively required under the Local Government Act to plan via their Infrastructure strategy for 50 year periods, and given this is not an exact science, applying a 1200mm sea level rise and a 1 in 100 year storm event to the District Plan now is an unfair application of the modelling that will have significant and detrimental effect on local Industry.</p> <p>For ██████████ at ██████████ Washdyke, this would mean a prediction the site will be under 1m of water in a 1 in 100 year event. The planned changes take the 1 in 100 year storm event to a 1 in 1000 year event on current day forecasting that is unlikely to occur within the next 50 year planning cycle.</p> <p>If this district plan change were to go ahead it would put future expansion plans for the plant in jeopardy.</p> <p>We propose to retain the current Timaru District Plan approach.</p>	
83.19	CE – Coastal environment	General	General	<p>██████████ seek the provisions within the CE chapter be amended.</p> <p>The Coastal Environment overlay extends along the entire coastline of Timaru District and its stated purpose in the introduction of Chapter CE is to “preserve the natural character of the coastal environment”. The overlay applies to the operational area of Timaru Port where the ██████████ bulk fuel storage terminals are located. The provisions that are proposed in the overlay are inconsistent with the underlying zoning (General Industrial) and existing environment at the port; a highly modified industrial area. In particular, the</p>	

				<p>provisions do not appear to recognise or provide appropriately for RSI. For example, Rule CE-R6 provides a permitted activity pathway for RSI but activities at the Port would not comply due to the exclusion of coastal high hazard areas. Consequently, any RSI cascades to require resource consent as non-complying activity. Similarly, CE-R7 provides for buildings and structures in the coastal environment as a permitted activity but only up to 150m2 and if they are for farming or residential activities only – port related buildings and structures less than 150m2 would require consent in all instances. ██████████ seek that the provisions that apply in the coastal environment overlay at the Port are amended to ensure that they give effect to Objective SD-O8.</p>	
100.42	CE – Coastal environment	General	General	<p>The coastal environment is a place highly valued for recreation, enjoyment, income, food gathering, recreation and cultural activities. A lot of coastal land is also held in private ownership and used for farming purposes.</p> <p>The coastal environment is ever changing, and it is diverse and adaptive. There are very different expectations from the different users of the marine environment. Iwi have customary rights to the sea and have strong beliefs on how coastal zones should be managed with respect to Taonga. At the same time land owners want to farm or develop their coastal land.</p> <p>With these issues in mind coastal land is rising in value and population densities are rising in coastal areas. This gives rise to increasing reverse sensitivity issues.</p> <p>The RMA has ambitiously sought to integrate the management of air, land, fresh water, and marine areas into one piece of legislation. The goal was to deal with coastal management in a more comprehensive and integrated manner. Responsibility of coastal management under the RMA is now shared primarily between the Minister of Conservation and regional councils, although territorial authorities have a role in some situations. There is a hierarchy of planning</p>	

			<p>instruments governing the management of the coastal environment: and the NZ Coastal Policy Statement, Regional Policy Statement, Regional Coastal Plan, Regional Land & Water Plan, and District Plan are all relevant.</p> <p>The sustainable management ethos of the RMA requires a balance between the coast as a resource of natural and cultural interest which should be protected and preserved, with its potential economic and commercial development. These potentially conflicting factors were explicitly recognised in the Whangamata Marina Society Inc v Attorney-General decision (at para 144).</p> <p>As with ONLs and SNAs, [REDACTED] acknowledges the importance of the coastal environment. However, the consideration of any change that may impact private landowners must involve individual engagement with potentially impacted farmers. The importance of early and open consultation with landowners cannot be underestimated.</p> <p>There are a number of activities within the coastal environment to which [REDACTED] has strong interest, including:</p> <ul style="list-style-type: none">• Stock access to beach• Crossing of waterways by stock or vehicles• Cropping and farming within the wider coastal marine area• Fertiliser application• Subdivision• Plantation Forestry• Earthworks, fencing, tracking, vegetation clearance (all issues if coastal area deemed ONLs)• Natural Character or 'visual amenity' landscapes• Unblocking debris from streams mouths to prevent upstream flooding of farm• Public access• Wind erosion	
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				<ul style="list-style-type: none"> • Retiring or fencing off dunes • Salinity issues – water table intrusion • Ongoing dune management • Iwi coastal zone expectations • Setbacks and reserves • Land use impacts on marine environment – runoff & leaching • Pressure on utilities • Zoning of outstanding natural landscapes or high amenity areas • Tensions between public and private interests • Roles of central and local government • Coastal hazards 	
101.17	CE – Coastal environment	General	General	The work on coastal hazards has been quickly reviewed and found to be comprehensive. One of the matters that requires further discussion is the maintenance of Washdyke Lagoon. The migration on shore of the gravel beach barrier has significant ramifications for the Washdyke industrial area and South Island Main Trunk line.	
121.6	CE – Coastal environment	General	General	additional provisions of the recognition and protection of historic heritage and cultural values should also be provided under district wide coastal environment matters. Significant historic and cultural sites and places are often located within the coastal environment, which also contribute to the natural values. Due to coastal development, natural hazards and climate change these sites are also under significant threat contributing to site loss, damage, or destruction.	
122.3	CE – Coastal environment	General	General	<p>████████████████████ ██████████ ██████████</p> <p>████████████████████</p> <p>████████████████████</p>	

[REDACTED]

[REDACTED]

I welcome and commend the collaborative approach taken by the authorities in engaging with us as an affected community in a natural hazard area, and hope that this can continue as we work together on the solutions.

However at the consultation open days while there was significant detail on what is happening and what is going to occur in the future in regard to climate change and increasing natural hazards, there was little if anything proposed in regard to mitigation solutions.

I understand it is early in the process, but there is a need for considerable thought to be directed towards practical, cost effective mitigation in areas where this is possible. I believe South Rangitata Huts Reserve is one such area where this is possible.

I believe we should not take a fatalistic approach that assumes loss is inevitable. We need to do what we can, and to be proactive rather than reactive.

Areas and communities that are able and willing to instigate mitigation measures against natural hazards should be allowed and encouraged to do so, particularly where there are cost effective

			<p>options where for relatively little outlay, protection or extension of time of use of assets is likely to result.</p> <p>Engaging with and encouraging a mindset of resilience and proactive practical mitigation in local communities is essential for dealing with the climate change induced natural hazards facing the district, and maintaining a positive community spirit.</p> <p>My concerns – coastal erosion</p> <p>When I first arrived at [REDACTED] there was a significant wide and high stony beach head between my hut and the sea. While there was some ebb and flow over the years, in 2019 the height of the beach head which is a natural feature that protects the huts was reduced by over one meter. Since then the sea has over topped the now reduced beach head regularly. In addition the width of the stony beach has been carved out and significantly reduced near the centre and southern end of the reserve.</p> <p>Essentially there has been a loss of material in the part of beach that protects the reserve over recent years. The beach head is a natural buffer which I believe has been depleted by opening the river mouth to the north, which encourages buildup of material to the north away from the reserve and huts.</p> <p>This can be readily observed, the river mouth and lagoon is quite active and changes every time you visit it, and more material is gradually ending up at the north end away from where it is needed to protect the reserve.</p> <p>Suggested mitigation measures for South Rangitata Huts</p> <p>While it is still relatively early in the piece, at this stage I see primarily two mitigation strategies;</p>	
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			<p>1. Putting in place a policy of <u>when appropriate, opening the Rangitata River mouth to the South rather than to the North</u>. This would allow the natural accretion process that has protected the reserve for hundreds of years to begin again. It will take a few years to build up, but it is probably the most cost effective solution that would give the most permanent result.</p> <p>The opening of the mouth is a policy which is already being done, it is just a matter of changing the direction of the opening, so really there is little if any additional cost.</p> <p>I understand opening the mouth to the south is not always appropriate depending on the sea conditions, but I submit that when the sea conditions are appropriate that on those occasions the mouth is opened to the south in order to allow the natural buildup of river stones and gravel to continue to protect the reserve and cost effectively reinforce the beach head which is a natural buffer that has protected the reserve in the past.</p> <p>If this strategy worked, it is possible the beach head over time could build up even greater than before and potentially provide enough of a natural buffer to mitigate against sea level rise into the future.</p> <p>Such a strategy would be in alignment with the New Zealand Coastal Policy Statement (NZCPS)</p> <p>2010 Policy 26: Natural defences against coastal hazards, which states;</p>	
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			<p>(1) Provide where appropriate for the protection, restoration or enhancement of natural defences that protect coastal land uses, or sites of significant biodiversity, cultural or historic heritage or geological value, from coastal hazards.</p> <p>(2) Recognise that such natural defences include beaches, estuaries, wetlands, intertidal areas, coastal vegetation, dunes and barrier islands.</p> <p>2. Allow protection measures to be put along the earth bank facing the sea to protect huts from erosion, including hard mitigation works. This would provide additional protection while the above policy of encouraging the rejuvenation of the stone beach head gradually builds up.</p> <p>Reasons to invest in mitigation of natural hazards such as coastal erosion at South Rangitata Huts</p> <p>(1) Relative value of assets to cost of mitigation</p> <p>The value of the assets at the South Rangitata Reserve could be in the order of \$15 million which is quite significant and consequently worthy of a reasonable investment in protecting through mitigation measures.</p>	
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Millions of dollars are spent on mitigation measures elsewhere in the district, but so far little has been spent on protecting our assets. We are not necessarily asking for a lot, but putting the issue in perspective and in fact the mitigation proposed need not be hugely expensive and potentially a lot could be achieved with relatively little outlay.

(2) Cultural value

Rangitata Huts has significant cultural value and a history that goes back over 120 years. [REDACTED] [REDACTED]
[REDACTED] There is a long and continuing history at the South Rangitata Huts, not only as fishing huts but as part of people's family traditions which have been ongoing for generations.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Other issues

Insurance

The current TDC leases at the reserve require huts to be insured. The council may need to loosen this requirement in the future if insurance companies become reluctant to insure at Rangitata Huts,

				which they may do as part of a broad policy in regard to insuring in natural hazard areas as climate change takes effect nationwide.	
158.26	CE – Coastal environment	Introduction	Timaru District’s coastal environment is generally	<p>1. The Introduction to this chapter states:</p> <p><i>‘The intent of the Coastal Environment chapter is to preserve the natural character of the coastal environment and protect it from inappropriate subdivision, use and development. This intent is achieved through the application of an overlay, which applies more directive rules to development and activities within the coastal environment, than would otherwise be applied in the underlying zones.’</i></p> <p>2. The Introduction goes on to reference the Port below that, though only in reference to its location in a coastal hazard area. The statement above needs to be modified to acknowledge the character of the Port area is not and is not expected to be like that of the wider coastal environment. The statement above is assumed to guide the assessment of what the characteristics and values of the Coastal Environment Overlay area, and is therefore relevant to multiple provisions throughout the Plan (as noted elsewhere in this letter). It is therefore critical that it reflect the presence of the Port.</p>	
158.27	CE – Coastal environment	Objectives	CE-O1 Coastal natural character The natu	<p>1. The Introduction goes on to reference the Port below that, though only in reference to its location in a coastal hazard area. The statement above needs to be modified to acknowledge the character of the Port area is not and is not expected to be like that of the wider coastal environment. The statement above is assumed to guide the assessment of what the characteristics and values of the Coastal Environment Overlay area, and is therefore relevant to multiple</p>	

				<p>provisions throughout the Plan (as noted elsewhere in this letter). It is therefore critical that it reflect the presence of the Port.</p> <p>That same comment, of the need to reflect and acknowledge the presence of the Port, flows through into the objectives and policies. CE-01 for example.</p>	
43.88	CE – Coastal environment	Objectives	CE-O2 Quality of the coastal environment	Retain as proposed or preserve the original intent.	
158.28	CE – Coastal environment	Objectives	CE-O2 Quality of the coastal environment	CE-O2 makes no reference to the exemption of the Port from the public access requirement	
43.87	CE – Coastal environment	Objectives	CE-O4 Coastal hazards People, buildin	Retain as proposed or preserve the original intent.	
43.89	CE – Coastal environment	Objectives	CE-O3 Kāti Huirapa values The relatio	Retain as proposed or preserve the original intent.	
72.19	CE – Coastal environment	Policies	CE-P1 Identifying the coastal environment	██████ supports the identification and mapping the inland extent of the coastal environment and the different elements and characteristics within it to give a clear understanding of the values in order to meet the objectives.	
86.12	CE – Coastal environment	Policies	CE-P10 Preserving the natural character of t	██████ considers that it is appropriate to provide for appropriately sized and located structures in the coastal environment.	Retain CE-P10 as drafted.
118.41	CE – Coastal environment	Policies	CE-P10 Preserving the natural character of t	<p>██████ opposes Policy CE-P10 to the extent that the Policy requires the absolute avoidance of any significant adverse effects.</p> <p>██████ considers that regionally significant infrastructure, such as the National Grid, often has an operational need or functional need to locate in the coastal environment and is of a nature and scale that means it is not possible to avoid all significant adverse effects. As such, this policy may have the effect of preventing the</p>	

			<p>operation, maintenance, upgrade and development of the National Grid in a manner that does not give effect to the National Policy Statement on Electricity Transmission. [REDACTED] also notes that, in respect of network utilities, Policy CE-P11 is somewhat perversely more stringent than Policy CE-P10. [REDACTED] seeks that Policy CE-P10 is amended as follows:</p> <p><i>“Provide for subdivision, use and development outside of areas of coastal high natural character that:</i></p> <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; and</i> 3. <i>is of a size, scale and nature that is appropriate, including limited earthworks, regionally significant infrastructure and buildings and structures for farming and residential activities; or</i> 4. <i>is regionally significant infrastructure that has an operational need or functional need for its location in the coastal environment;</i> <p><i>while taking into account that parts of the coastal environment have been historically modified by farming activities and built development.”</i></p>	
158.33	CE – Coastal environment	Policies	CE-P10 Preserving the natural character of t	1. CE-P10 does reference regionally significant infrastructure.
43.92	CE – Coastal environment	Policies	CE-P3 Identifying coastal hazards Ide	Retain as proposed or preserve the original intent. The policy appears to be consistent with the CRPS
43.90	CE – Coastal environment	Policies	CE-P4 Role of natural features and vegetatio	Retain as proposed or preserve the original intent.

72.21	CE – Coastal environment	Policies	CE-P5 Coastal natural character matters	██████ supports the matters listed in the policy as contributing to the coastal natural character. The matters help to identify the aspects that give rise to natural character and help to inform how CE-O1 will be preserved and protected while enabling people and communities to provide for their social, economic and cultural wellbeing and their health and safety.	
158.29	CE – Coastal environment	Policies	CE-P5 Coastal natural character matters	Policy CE-P5 makes no reference to the Port and its influence on natural character.	
72.22	CE – Coastal environment	Policies	CE-P7 Restoration or rehabilitation of natural character	██████ supports the restoration or rehabilitation of the coastal natural character where appropriate but questions why opportunities for enhancement where there will be adverse effects to only be considered and not required. CE-O1 commits to preserving and protecting the natural character of Timaru's coastal environment. By not requiring remediation or enhancement when there will be adverse effects cannot achieve CE-O1. ██████ seeks that the policy is more directive in its requirement to enhance/remediate in order to achieve the related objective.	
158.30	CE – Coastal environment	Policies	CE-P7 Restoration or rehabilitation of natur	CE-P7 could be problematic for Port development.	
158.31	CE – Coastal environment	Policies	CE-P8 Maintain and/or enhance the quality of	CE-P7 could be problematic for Port development. Also CE-P8.	
158.32	CE – Coastal environment	Policies	CE-P9 Anticipated activities Enable a	CE-P9 – there is no recognition of the Port as an anticipated activity	
43.93	CE – Coastal environment	Policies	CE-P11 Preserve the natural character qualit	Retain as proposed or preserve the original intent.	
86.13	CE – Coastal environment	Policies	CE-P11 Preserve the natural character qualit	██████ supports the recognition that some activities have a functional need to locate in areas with coastal environment.	Retain CE-P11 as drafted.

<p>118.42</p>	<p>CE – Coastal environment</p>	<p>Policies</p>	<p>CE-P11 Preserve the natural character qualit</p>	<p>██████ opposes Policy CE-P11 to the extent that the Policy requires the absolute avoidance of any significant adverse effects. ██████ considers that regionally significant infrastructure, such as the National Grid, may have an operational need or functional need to locate in areas of high natural character in the coastal environment and is of a nature and scale that means it is not possible to avoid all significant adverse effects. It is acknowledged that the final clause of the Policy goes some way to recognising this. However, the use of ‘while’ means that the ‘avoid’ clause still applies and this policy may have the effect of preventing the operation, maintenance, upgrade and development of the National Grid in a manner that does not give effect to the National Policy Statement on Electricity Transmission and ██████ therefore seeks that Policy CE-P11 is amended as follows:</p> <p><i>“Only allow subdivision, use and development in areas of coastal high natural character where it:</i></p> <ol style="list-style-type: none"> 1. <i>avoids significant adverse effects; and</i> 2. <i>avoids, remedies or mitigates all other adverse effects on the identified natural character qualities; and</i> 3. <i>demonstrates that it is appropriate by ensuring that the area of coastal high natural character continues to:</i> 4. <i>recognise and provide for the on-going natural physical processes that have created the coastal environment; and</i> 5. <i>retain the integrity of landforms and geological features; and</i> 6. <i>retain a sense of remoteness and wildness; and</i> 7. <i>retain areas of indigenous vegetation, and enhance these where possible; and</i> 8. <i>recognise River mouths, and Lagoons as important breeding, feeding and resting places for wetland and coastal birds, including waders; and or</i> 	
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43.98	CE – Coastal environment	Policies	CE-P12 Coastal high hazard areas Avoi	█ supports the intent of this policy in non-urban areas as it is consistent with CRPS coastal hazard provisions.	
122.2	CE – Coastal environment	Policies	CE-P12 Coastal high hazard areas Avoi	I support this policy CE-P12, in particular that this allows for earthworks for coastal erosion or hazard mitigation purposes within coastal high hazard areas.	
158.34	CE – Coastal environment	Policies	CE-P12 Coastal high hazard areas Avoi	1. Policy CE-P12 is noted in that it excludes regionally significant infrastructure, which is appropriate. In its present format it would however exclude all supporting activity beside the Port in the existing industrial area that is not strictly part of the Port, and therefore this policy is opposed.	
43.97	CE – Coastal environment	Policies	CE-P13 Regionally significant infrastructure	Retain as proposed or preserve the original intent.	
145.74	CE – Coastal environment	Policies	CE-P13 Regionally significant infrastructure	support	
158.35	CE – Coastal environment	Policies	CE-P13 Regionally significant infrastructure	1. Policy CE-P13 is obviously a critical policy also. The Port can demonstrate a functional need to be locate in the Coastal High Hazard Areas, but we are not clear as to whether it can be proven that the effects of coastal high hazard won't be exacerbated on adjoining or surrounding land, particularly if the consideration is displacement of inundation water.	
83.22	CE – Coastal environment	Policies	Avoid regionally significant infrastructure in a coastal high	<p>Support in part.</p> <p>It is important that █ bulk fuel storage terminals, which are subject to the coastal high hazard overlays, can be operated,</p>	

			<p>hazard area unless: there is a functional need for it locate there; and it will not e</p>	<p>maintained and upgraded. In this respect, the [REDACTED] consider that Policy CE-P13, which requires avoidance of regionally significant infrastructure in coastal high hazard areas unless there is a functional need, should also refer to operational need.</p> <p>For instance, it may be possible functionally to avoid utilities crossing a river but operationally it may be critical to if that area is to be supplied power. Similar applies to bulk fuel storage infrastructure – while it may be possible to locate some infrastructure outside of these areas it is not practicable given the operational requirements. Similarly, the rules, for instance CE-R6, CE-R9, and CE-R11, do not appear to provide for any permitted activities (RSI, buildings/structures, or earthworks) in coastal high hazard areas. This does not promote sustainable management of existing activities occurring in these areas.</p> <p>Amend the wording of CE-P13 to include operational need within direction of CE-P13.</p>	
43.91	CE – Coastal environment	Policies	CE-P2 Identifying areas of high coastal natu	Retain as proposed or preserve the original intent. [REDACTED] supports the identification of areas of high natural character.	
72.20	CE – Coastal environment	Policies	CE-P2 Identifying areas of high coastal natu	[REDACTED] supports the identification of areas with high natural character in order to meet CE-O1.	
43.94	CE – Coastal environment	Policies	CE-P6 Kāti Huirapa values Recognise a	Retain as proposed or preserve the original intent.	
93.20	CE – Coastal environment	Rules		<p>[REDACTED] is located in the <u>Coastal Environment Area</u> overlay.</p> <p>Resource consent triggers, notification and decision making may be constraints for [REDACTED]</p> <ul style="list-style-type: none"> · Consent required for any new buildings and structures. 	

				<ul style="list-style-type: none"> Maximum height of buildings and structures to not exceed 4m. The maximum footprint of any building or structure to not exceed 2000m² All buildings and structures must be finished in materials with a maximum reflectance value of 30%. <p>The limitations conflict with the GIZ outcomes and will be an ongoing constraint to site development.</p> <p>█████ would welcome an opportunity to meet with the Timaru District Council to discuss our comments and to have focused dialogue on the future planning framework as it affects our site at ██████████ in Timaru. This may include developing a Precinct for the site with a bespoke planning response.</p>										
43.95	CE – Coastal environment	Rules	CE-R13 Quarrying / Mining Activity Co	Consider whether this rule is intended to address gravel extraction which may also be covered by regional plans.										
141.120	CE – Coastal environment	Rules	CE-R11 Earthworks Coastal high hazard	<table border="1"> <tr> <td>CE-R11</td> <td></td> <td>This rule reads that the plan only anticipates earthworks in the Coastal high hazard area when they are for coastal erosion or hazard mitigation works.</td> </tr> <tr> <td>Earthworks</td> <td>Oppose in part</td> <td>█████ would support this being the only earthworks activity regulated in this area (over and above the earthworks rules that apply at the zone level) – if this was the case, the title this would be made clearer by amending the title.</td> </tr> <tr> <td>In Coastal High Hazard Area</td> <td></td> <td></td> </tr> </table>	CE-R11		This rule reads that the plan only anticipates earthworks in the Coastal high hazard area when they are for coastal erosion or hazard mitigation works.	Earthworks	Oppose in part	█████ would support this being the only earthworks activity regulated in this area (over and above the earthworks rules that apply at the zone level) – if this was the case, the title this would be made clearer by amending the title.	In Coastal High Hazard Area			<p>Amend the title of CE-R11 to:</p> <p>CE-R11 Earthworks <u>for coastal erosion or hazard mitigation works</u></p> <p>-</p> <p>(Or include a permitted activity rule for ancillary rural earthworks, if these are captured by this rule)</p>
CE-R11		This rule reads that the plan only anticipates earthworks in the Coastal high hazard area when they are for coastal erosion or hazard mitigation works.												
Earthworks	Oppose in part	█████ would support this being the only earthworks activity regulated in this area (over and above the earthworks rules that apply at the zone level) – if this was the case, the title this would be made clearer by amending the title.												
In Coastal High Hazard Area														

						<p>If the intent of the rule is that any other earthworks (i.e. including ancillary rural earthworks) then default to non-complying activity, ██████ seek that ancillary rural earthworks be provided for as a permitted activity.</p>	
43.100	CE – Coastal environment	Rules	CE-R11 Earthworks Coastal high hazard	<p>Amend DIS-1: The earthworks are for the <u>construction of new coastal</u> erosion or hazard mitigation works.</p> <p>Clarify the intended relationship between DIS-1 and NC-1 and when each applies. Consider whether it would be appropriate to include an advice note that this rule does not apply where the Regional Coastal Environment Plan is in effect.</p>			
158.38	CE – Coastal environment	Rules	CE-R11 Earthworks Coastal high hazard	<p>1. CE-R11 is unnecessarily onerous in the Port and adjoining industrial area.</p>			
141.121	CE – Coastal environment	Rules	CE-R12 Farming Coastal high natural c	<p>CE-R12 Farming</p> <p>Coastal high natural character area</p>	<p>Oppose</p>	<p>██████ see challenges which how, in practice, this rule might apply to existing farming operations that as part of their operation vary (e.g. for vegetable growing, crop rotation may mean a paddock is cropped one out of every 10 years for example). The need for this rule to manage is unclear in the context of the other provisions that</p>	<p>Delete CE-R12.</p>

				<p>already apply to the Coastal High Natural Character area.</p> <p>In addition, the rationale for farming that involves irrigation defaulting to a non-complying activity is unclear.</p>	
156.4	CE – Coastal environment	Rules	CE-R12 Farming Coastal high natural c	As above	· Issues with CE-10 and CE-12 added to our register of issues for review.
43.99	CE – Coastal environment	Rules	CE-R10 Earthworks Coastal high natur	<p>Amend as follows:</p> <div style="background-color: #e1f5fe; padding: 10px;"> <p style="text-align: center;">Activity status: Permitted</p> <p style="text-align: center;">Where:</p> <p>Coastal high natural character area</p> <p>PER-1 The earthworks are for the purpose of maintenance and repair of existing fence lines, roads or tracks, <u>or hazard mitigation works</u>; or</p> <p style="text-align: center;">PER-2</p> </div> <p>Activity status when compliance not achieved with PER-1, PER-2 or PER-3: Discretionary</p>	

				<p>The earthworks are for the purpose of installation of underground network utilities and ancillary structures; or</p> <p>PER-3</p> <p>Any other earthworks do not exceed the following quantum of disturbance (fill, excavation or removal):</p> <ol style="list-style-type: none"> 1. 100m³ per site, or 2. 100m² per site. 			
141.119	CE – Coastal environment	Rules	CE-R10 Earthworks Coastal high natur	<p>CE-R10 Earthworks</p> <p>In Coastal High Natural Character Area</p>	<p>Support in part</p>	<p>The permitted activity conditions of this rule go some way towards enabling day-today farming earthworks, however █████ consider it would be more efficient and effective to have a specific permitted activity rule or condition for ancillary rural earthworks.</p>	<p>Include a permitted activity rule for Ancillary Rural Earthworks.</p>
145.79	CE – Coastal environment	Rules	CE-R10 Earthworks Coastal high natur	Support		retain	

156.3	CE – Coastal environment	Rules	CE-R10 Earthworks Coastal high natur	<p>1. We discussed rules that could have implications for farm operations. Agreed that none of the rules likely to impact on farming because of existing use rights but potential interpretation issues and effectiveness problems identified with CE-10 and CE-12 as follows:</p> <p>CE-10 PER-3 applies earthworks limits to whole site (100m² and 100m³) regardless of whether activity is only in a portion of the Coastal High Natural Character Area or even not even in the area.</p> <p>CE-12 Farming that does not involve irrigation is DIS, and while existing use rights enable farming there is a potential jurisdiction overlap with Environment Canterbury to which resource consents are held (Farm Management Plans) and it is unclear what we would assess if TDC needed to consider an application to infringe the rule?</p>	<ul style="list-style-type: none"> Issues with CE-10 and CE-12 added to our register of issues for review. 			
141.117	CE – Coastal environment	Rules	CE-R3 Planting of trees and/or vegetation	<table border="1"> <tr> <td data-bbox="840 687 1041 1278"> <p>CE-R3 Planting of trees and/or vegetation</p> <p>Coastal Environment Overlay</p> </td> <td data-bbox="1041 687 1160 1278"> <p>Support in part</p> </td> <td data-bbox="1160 687 1583 1278"> <p>There is rule refers to ‘planting of trees and/or vegetation’ – which is undefined, however the permitted activity conditions go on to state this is for conservation, restoration or enhancement purposes and is limited to indigenous species, with a note that this excludes planting of crops or plantation forestry.</p> <p>We interpret this to mean that horticultural planting in the Coastal Environment Overlay (outside of the Coastal High Natural Character Area, which is subject to CE-R12 for farming) is not managed by these rules.</p> </td> </tr> </table>	<p>CE-R3 Planting of trees and/or vegetation</p> <p>Coastal Environment Overlay</p>	<p>Support in part</p>	<p>There is rule refers to ‘planting of trees and/or vegetation’ – which is undefined, however the permitted activity conditions go on to state this is for conservation, restoration or enhancement purposes and is limited to indigenous species, with a note that this excludes planting of crops or plantation forestry.</p> <p>We interpret this to mean that horticultural planting in the Coastal Environment Overlay (outside of the Coastal High Natural Character Area, which is subject to CE-R12 for farming) is not managed by these rules.</p>	<p>Clarify that horticultural planting in the Coastal Environment overlay is a permitted activity.</p>
<p>CE-R3 Planting of trees and/or vegetation</p> <p>Coastal Environment Overlay</p>	<p>Support in part</p>	<p>There is rule refers to ‘planting of trees and/or vegetation’ – which is undefined, however the permitted activity conditions go on to state this is for conservation, restoration or enhancement purposes and is limited to indigenous species, with a note that this excludes planting of crops or plantation forestry.</p> <p>We interpret this to mean that horticultural planting in the Coastal Environment Overlay (outside of the Coastal High Natural Character Area, which is subject to CE-R12 for farming) is not managed by these rules.</p>						
118.43	CE – Coastal environment	Rules	CE-R6 Regionally significant infrastructure	<p>██████ does not support non-complying activity status applying to regionally significant infrastructure in the coastal high hazard area.</p> <p>██████ considers that such a stringent activity status does not</p>				

				give effect to the enabling policies of the National Policy Statement on Electricity Transmission Activities or the approach set out to the management of effects in Policy 16.3.4 of the Canterbury Regional Policy Statement. ██████████ considers that discretionary activity status is the most appropriate and efficient way to give effect to the NPSET and CRPS.	
145.75	CE – Coastal environment	Rules	CE-R6 Regionally significant infrastructure	support	
158.36	CE – Coastal environment	Rules	CE-R6 Regionally significant infrastructure	1. Rule CE-R6 PER-2 seems to completely undermine the Port activity, as the Port is almost in its entirety located within a Coastal High Hazard Area (part Erosion and mainly Inundation). Almost all Port activity would be a non-complying activity.	
83.21	CE – Coastal environment	Rules	All zones Activity status: Non-complying Where: NC-1The regionally significant infrastructure is located in a coastal high hazard area beyond the co	Amend. Rule CE-R6 provides a permitted activity pathway for RSI but activities at the Port would not comply due to the exclusion of coastal high hazard areas. Consequently, any RSI cascades to require resource consent as non-complying activity ██████████ seek that the provisions that apply in the coastal environment overlay at the Port are amended to ensure that they give effect to Objective SD-O8.	
86.14	CE – Coastal environment	Rules	CE-R7 Buildings and structures (excluding fe	It is appropriate to provide for the maintenance and upgrade of existing non-habitable structures in the coastal environment overlay as a permitted activity.	Amend CE-R7 as follows: Activity status: Permitted Where: PER-1

					<p>The building or structure does not exceed 150m² in area; and</p> <p>PER-2</p> <p>The building or structure is used for farming or residential activities; and</p> <p>PER-3</p> <p>CE-S1, CE-S2, CE-S3 and GRUZ-S3 (setbacks) are complied with.</p> <p><u>PER-4</u></p> <p><u>The works involve the maintenance or upgrade of an existing non-habitable building or structure.</u></p>
83.20	CE – Coastal environment	Rules	Coastal environment overlay excluding coastal high natural character area and coastal high hazard areas. Activity status: Permitted Where: PER-1	<p>Amend.</p> <p>CE-R7 provides for buildings and structures in the coastal environment as a permitted activity but only up to 150m² and if they are for farming or residential activities only – port related buildings and structures less than 150m² would require consent in all instances.</p> <p>██████████ seek that the provisions that apply in the coastal environment overlay at the Port are amended to ensure that they give effect to Objective SD-O8.</p>	
145.76	CE – Coastal environment	Rules	CE-R7 Buildings and structures (excluding fe	Clarity should be provided as to whether or not this applies to infrastructure.	

158.37	CE – Coastal environment	Rules	CE-R7 Buildings and structures (excluding fe	1. CE-R7 is unnecessarily onerous in the Port and adjoining industrial area.	
86.15	CE – Coastal environment	Rules	CE-R8 Buildings and structures (including fe	It is appropriate to provide for the maintenance and upgrade of existing non-habitable structures in the coast high character area as a permitted activity.	<p>Amend CE-R7 as follows:</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1</p> <p>The building or structure does not exceed 10m2 in area; and</p> <p>PER-2</p> <p>CE-S1, CE-S2, CE-S3 and GRUZ-S3 are complied with.</p> <p><u>PER-3</u></p> <p><u>The works involve the maintenance or upgrade of an existing non-habitable building or structure.</u></p>
145.77	CE – Coastal environment	Rules	CE-R8 Buildings and structures (including fe	Clarity should be provided as to whether or not this applies to infrastructure.	
86.16	CE – Coastal environment	Rules	CE-R9 Buildings and structures (including fe	It is appropriate to provide for the maintenance and upgrade of existing non-habitable structures in the coastal high hazard areas as a permitted activity.	<p>Amend CE-R9 as follows:</p> <p>Activity status: Permitted</p> <p>PER-1</p>

						<p>The building or structure is a farm building in a Rural zone, that only has an unsealed or permeable floor; and</p> <p>PER-2</p> <p>CE-S1, CE-S2, CE-S3 and GRUZ-S3 are complied with and</p> <p>PER-3</p> <p>The building or structure is not located seaward of the coastal erosion line identified on the planning maps.</p> <p><u>PER-4</u></p> <p><u>The works involve the maintenance or upgrade of an existing non-habitable building or structure.</u></p>	
141.118	CE – Coastal environment	Rules	CE-R9 Buildings and structures (including fences)	<p>CE-R9 Buildings and structures (excluding fences)</p> <p>Coastal high hazard area (non-urban areas)</p>	Support	<p>Support the exclusion for fences.</p> <p>Support the allowance for farm buildings or structures – however instead of referring to those without that have unsealed or permeable floors, we consider it would be more appropriate to refer to non-habitable building – the rationale for managing the risk of a farm building with a floor is uncertain. In our view, all non-habitable farm buildings have significantly less risk than a</p>	<p>Retain, with amendment:</p> <p>PER-1</p> <p>The building or structure is a <u>non-habitable</u> farm building in a Rural zone, that only has an unsealed or permeable floor; and</p>

				habitable building located in an area of natural hazard.	
43.96	CE – Coastal environment	Rules	CE-R9 Buildings and structures (including fe	Retain as proposed or preserve the original intent.	
145.78	CE – Coastal environment	Rules	CE-R9 Buildings and structures (including fe	Clarity should be provided as to whether or not this applies to infrastructure.	

93.11	CE – Coastal environment	Rules	CE-R9 Buildings and structures (including fe	New buildings and structures, and additions to existing buildings/structures are a Non-Complying Activity with significant uncertainty as to whether consent would be granted.	
83.23	CE – Coastal environment	Rules	General	Amend rules contained in CE. CE-R6, CE-R9, and CE-R11, do not appear to provide for any permitted activities (RSI, buildings/structures, or earthworks) in coastal high hazard areas. This does not promote sustainable management of existing activities occurring in these areas.	

158.39	CE – Coastal environment	Standards	CE-S1 Height of buildings and structures	1. CE-R11 is unnecessarily onerous in the Port and adjoining industrial area.	Exemption for the Port
158.40	CE – Coastal environment	Standards	CE-S2 Site coverage Coastal environme	1. CE-S2 and CE-S3 are also unnecessarily onerous in the Port and adjoining industrial area.	Exemptions for the Port
158.41	CE – Coastal environment	Standards	CE-S3 Building and structure external materi	1. CE-S2 and CE-S3 are also unnecessarily onerous in the Port and adjoining industrial area.	Exemptions for the Port