

OFFICER'S REPORT FOR:

Hearing Commissioners

SUBJECT:

**Proposed Timaru District Plan: Strategic
Directions and Urban Form and Development
Chapters**

PREPARED BY:

Andrew Willis

REPORT DATED:

5 April 2024

DATE OF HEARING:

8 May 2024

Executive Summary

1. This report considers the submissions received by the Timaru District Council in relation to the relevant objectives, policies, rules and definitions of the Proposed Timaru District Plan (PDP) as they apply to the Strategic Directions and Urban Form and Development chapters. The report outlines recommendations in response to the issues that have emerged from these submissions.
2. As set out in **Appendix B**, there were 143 primary submission points on the Strategic Directions (SD) chapter and Urban Form and Development (UFD) chapter and 103 further submission points. The submissions received were diverse and sought a range of outcomes. The following are considered to be the key issues in contention with the chapter:
 - minor amendments to provide greater clarity;
 - clarifying how the strategic directions are to be interpreted in relation to the remainder of the PDP;
 - making clearer statements on reverse sensitivity;
 - providing greater direction on climate change matters, including references to the Emissions Reduction and National Adaptation plans;
 - providing a positive framework for establishing new business zoned land;
 - providing better integration of mana whenua matters across the strategic directions objectives to provide guidance on how to address issues when the activity impacts more than one strategic objective;
 - covering infrastructure more generally (i.e. more than sewer and water infrastructure) to service rural lifestyle development;
 - promoting the increase of indigenous vegetation cover in the district and clarifying when restoration is required;
 - recognising the central role that renewable electricity generation, electricity transmission and distribution play in achieving NZ's decarbonisation requirements;
 - ensuring that natural hazard risks to native species and habitat are identified and appropriately mitigated;
 - recognising that many sites of significance to mana whenua are on private property and that landowner permission is required to access these;
 - expressly recognising industrial activities and land requirements;
 - recognising that the commercial 'Large Format Retail' zone can function as a complementary hub for retail and commercial activity within the Timaru urban area;
 - recognising community facilities are a common activity within centres;
 - recognising the importance of physical construction materials;
 - supporting the continuance and operational ability of regional infrastructure including the Redruth landfill;
 - better protection of rural areas for their intended purpose;
 - excluding public access along the coastal marine area within the operational area of the Port of Timaru;
 - including a minimum household density for greenfield development;

- including objectives and policies from the Future Development Area chapter in the Strategic Directions chapter, and/or the Urban Form and Development chapter;
 - adding an additional Urban Form and Development (UFD) chapter objective for business growth; and
 - explicitly referring to education activities in future development areas.
3. This report addresses each of these matters, as well as other issues raised by submissions.
 4. Having considered all the submissions and reviewed all relevant statutory and non-statutory documents, I recommend that the PDP should be amended as set out in Appendix A of this report. Given the extent of recommended changes I will not summarise these here. I consider that the proposed objectives, subject to the recommended amendments, will be the most appropriate means to achieve the purpose of the RMA, and give effect to higher order planning documents.

Executive Summary	1
Interpretation	5
1 Introduction	8
1.1 Purpose	8
1.2 Author	8
1.3 Supporting Evidence	8
1.4 Key Issues in Contention	9
1.5 Procedural Matters	10
2 Statutory Considerations	11
2.1 National Direction Changes	11
2.2 Trade Competition	12
3 Consideration of Submissions and Further Submissions	13
3.1 Overview	13
3.2 General Submissions	14
3.3 Definitions	17
3.4 Strategic Directions Introduction	17
3.5 Objective SD-O1 Residential Areas and Activities	19
3.6 Objective SD-O2 – The Natural and Historic Environment	23
3.7 Objective SD-O3 – Climate Change	28
3.8 Objective SD-O4 – Natural Hazards	31
3.9 Objective SD-O5 – Mana Whenua	35
3.10 SD-O6 - Business Areas and Activities	39
3.11 Objective SD-O7 – Centres	42
3.12 Objective SD-O8 – Infrastructure	44
3.13 Objective SD-O9 - Rural Areas	47
3.14 SD-O10 - Community and Open Space	55
3.15 UFD – Urban Form and Development	56
4 Conclusions	68

Appendices

Appendix A - Recommended Amendments

Appendix B - Recommended responses to submissions and further submissions

Appendix C - Report Author's Qualifications and Experience

Appendix D - Changes between the initial published s42A report and this updated report

Appendix D. Changes between the initial published s42A report and this updated report

List of Tables

Table 1: Abbreviations	5
Table 2: Abbreviations of Submitters' Names	5
Table 3: National Direction Changes.....	4

List of Tables in Appendices

No table of figures entries found.

Interpretation

5. This Officer's report utilises a number of abbreviations for brevity as set out in Table 1 below. In addition, references to submissions includes further submissions, unless otherwise stated.

Table 1: Abbreviations

Abbreviation	Means
Council	Timaru District Council / territorial authority
CRPS	Operative Canterbury Regional Policy Statement
DPR	District Plan Review
GMS	Growth Management Strategy
NFL	Natural Features and Landscapes Chapter
NPS-HPL	National Policy Statement for Highly Productive Land
NPS-IB	National Policy Statement for Indigenous Biodiversity
NPS-ET	National Policy Statement on Electricity Transmission 2008
NPS-REG	National Policy Statement for Renewable Electricity Generation 2011
NPS-UD	National Policy Statement on Urban Development 2020
PDP	Proposed Timaru District Plan
SD Chapter	Strategic Directions Chapter
Operative Plan	Operative Timaru District Plan
RMA	Resource Management Act 1991
UFD Chapter	Urban Form and Development Chapter

Table 2: Abbreviations of Submitters' Names

Submitter Ref	Submitter Name	Abbreviation
27	Holly Renee Singline and RSM Trust Limited	Singline and RSM Trust
33	Ford, Pyke, Andrews Talbot, Wilkins & Proudfoot, Craig, Mackenzie	Ford et al
34	Greenfield, McCutcheon, Tarrant, Sullivan and Ellery	Greenfield et al
42	Timaru District Council	TDC
53	Helicopters South Canterbury 2015 Limited	Helicopters Sth Cant.
60	Milward Finlay Lobb	MFL
66	Bruce Speirs	Speirs, B
86	Balance Agri-Nutrients Limited	Ballance
89	Dairy Holdings Limited	Dairy Holdings
94	Port Blakely Limited	Port Blakely
106	Minister / Ministry of Education	MoE
107	Lineage Logistics New Zealand Limited	Lineage Logistics

Submitter Ref	Submitter Name	Abbreviation
114	Heritage New Zealand Pouhere Taonga	Heritage NZ
132	New Zealand Agricultural Aviation Association	NZAAA
140	Southern Proteins Limited	Southern Proteins
143	Waka Kotahi NZ Transport Agency	Waka Kotahi
152	Radio New Zealand	Radio NZ
156	Royal Forest and Bird Protection Society	Forest and Bird
159	Transpower New Zealand Ltd	Transpower
162	Enviro NZ Services Limited (formerly Enviro Waste Services Limited)	Enviro NZ
163	Synlait Milk Ltd	Synlait
165	Fonterra Limited	Fonterra
166	Penny Nelson, Director-General of Conservation, Tumuaki Ahurei	Dir. General Conservation
168	Hilton Haulage Limited Partnership	Hilton Haulage
169	Road Metals Company Limited	Road Metals
170	Fulton Hogan Limited	Fulton Hogan
172	Silver Fern Farms Limited	Silver Fern Farms
173	Alliance Group Limited	Alliance Group
175	PrimePort Limited	PrimePort
176	Connexa Limited	Connexa
178	Rural Contractors New Zealand Incorporated	Rural Contractors
179	Barkers Fruit Processors Limited	Barkers
181	Opuha Water Limited	OWL
182	Federated Farmers of New Zealand Inc.	Federated Farmers
183	Environment Canterbury / Canterbury Regional Council	ECan
185	Te Rūnanga o Ngāi Tahu	Te Rūnanga o Ngāi Tahu
187	KiwiRail Holdings Limited	KiwiRail
190	North Meadows 2021 Limited and Thompson Engineering (2002) Limited	North Meadows
192	Harvey Norman Properties (NZ) Limited	Harvey Norman
196	BP Oil, Mobil Oil NZ Ltd, Z Energy	BP Oil et al
208	Spark New Zealand Trading Ltd	Spark
209	Chorus New Zealand Ltd	Chorus
210	Vodafone New Zealand Ltd / One.NZ	Vodafone

Submitter Ref	Submitter Name	Abbreviation
219	Timaru Town Centre Ratepayers Action Group	Timaru TC Ratepayers
223	Timaru Civic Trust	Timaru Civic Trust
229	Kāinga Ora - Homes and Communities	Kāinga Ora
239	Ara Poutama Aotearoa, The Department of Corrections	Dept. Corrections
240	Te Tumu Paeroa, Office of the Maori Trustee	Te Tumu Pareora
242	Woolworths New Zealand Limited	Woolworths
245	Horticulture NZ	Hort NZ
247	NZ Pork Industry Board	NZ Pork
248	White Water Properties Limited	White Water
255	NZ Frost Fans Limited	NZ Frost Fans

1 Introduction

1.1 Purpose

6. This report is prepared under section 42A of the RMA. The purpose of this report is to provide the Hearings Panel with a summary and analysis of the submissions received on the Strategic Directions (SD) and Urban Form and Development (UFD) chapters and to recommend possible amendments to the Proposed District Plan (PDP) in response to those submissions.
7. This report discusses general issues or topics arising, the original and further submissions received following notification of the PDP, makes recommendations as to whether or not those submissions should be accepted or rejected, and concludes with a recommendation for changes to the PDP provisions based on the preceding discussion in the report.
8. This report is provided to assist the Hearings Panel in their role as Independent Commissioners. The Hearings Panel may choose to accept or reject the conclusions and recommendations of this report and may come to different conclusions and make different recommendations, based on the information and evidence provided to them by submitters.

1.2 Author

9. My name is Andrew Willis. My qualifications and experience are set out in **Appendix C** of this report. My role in preparing this report is that of an expert planner.
10. I was involved in the preparation of the PDP and co-authored both the Strategic Directions and Urban Form and Development Section 32 Evaluation Report for these chapters.
11. Although this is a District Council Hearing, I have read the Code of Conduct for Expert Witnesses contained in the 2023 Practice Note issued by the Environment Court. I have complied with that Code when preparing my written statement of evidence and I agree to comply with it when I give any oral evidence.
12. The scope of my evidence relates to the SD and UFD chapters. I confirm that the issues addressed in this statement of evidence are within my area of expertise as an expert policy planner.
13. Any data, information, facts, and assumptions I have considered in forming my opinions are set out in the part of the evidence in which I express my opinions. Where I have set out opinions in my evidence, I have given reasons for those opinions.
14. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

1.3 Supporting Evidence

15. The expert evidence, literature, legal cases or other material which I have used or relied upon in support of the opinions expressed in this report includes the following:
 - The Canterbury Regional Policy Statement (CRPS);
 - Various chapters within the PDP; and
 - Relevant national policy statements.

1.4 Key Issues in Contention

16. The submissions received on the SD and UFD chapters were diverse and sought a range of outcomes, ranging from seeking clearer statements on reverse sensitivity to changes to achieve better alignment with the recently gazetted NPS-IB.
17. I consider the following to be the key issues in contention in the chapter:
 - Minor amendments to provide greater clarity;
 - clarifying how the strategic directions are to be interpreted in relation to the remainder of the PDP;
 - making clearer statements on reverse sensitivity;
 - providing greater direction on climate change matters, including references to the Emissions Reduction and National Adaptation plans;
 - providing a positive framework for establishing new business zoned land;
 - providing better integration of mana whenua matters across the strategic directions objectives to provide guidance on how to address issues when the activity impacts more than one strategic objective;
 - covering infrastructure more generally (i.e. more than sewer and water infrastructure) to service rural lifestyle development;
 - promoting the increase of indigenous vegetation cover in the district and clarifying when restoration is required;
 - recognising the central role that renewable electricity generation, electricity transmission and distribution play in achieving NZ's decarbonisation requirements;
 - ensuring that natural hazard risks to native species and habitat are identified and appropriately mitigated;
 - recognising that many sites of significance to mana whenua are on private property and that landowner permission is required to access these;
 - expressly recognising industrial activities and land requirements;
 - recognising that the commercial 'Large Format Retail' zone can function as a complementary hub for retail and commercial activity within the Timaru urban area;
 - recognising community facilities are a common activity within centres;
 - recognising the importance of physical construction materials;
 - supporting the continuance and operational ability of regional infrastructure including the Redruth landfill;
 - better protection of rural areas for their intended purpose;
 - excluding public access along the coastal marine area within the operational area of the Port of Timaru;
 - including a minimum household density for greenfield development;
 - including objectives and policies from the Future Development Area chapter in the Strategic Directions chapter, and/or the Urban Form and Development chapter;
 - adding an additional UFD chapter objective for business growth; and
 - explicitly referring to education activities and future development areas.

18. These issues are addressed in this report, as well as any other issues raised by submissions.

1.5 Procedural Matters

19. At the time of writing this report there have been no pre-hearing meetings. I understand that all late submissions were accepted by the Panel on 27 June 2023.

2 Statutory Considerations

20. The assessment under the RMA for the PDP includes the matters identified in sections 74-76 of the RMA. This includes whether:

- it is in accordance with the Council's functions (s74(1)(a));
- it is in accordance with Part 2 of the RMA (s74(1)(b));
- it will give effect to any national policy statement or operative regional policy statement (s75(3)(a) and (c));
- the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA (s32(1)(a));
- the provisions within the plan change are the most appropriate way to achieve the objectives of the District Plan (s32(1)(b)).

21. In addition, assessment of the PDP must also have regard to:

- any proposed regional policy statement, and management plans and strategies prepared under any other Acts (s74(2));
- the extent to which the plan is consistent with the plans of adjacent territorial authorities (s74 (2)(c)); and
- in terms of any proposed rules, the actual or potential effect on the environment of activities including, in particular, any adverse effect.

2.1 National Direction Changes

22. The national direction changes that have occurred since notification of the Proposed Plan are set out below.

Table 3: National Directions Changes

Instrument	Changes	How it is being addressed within Proposed Plan officers' reports
National Policy Statement on Indigenous Biodiversity	Now operative	Not addressed in the Proposed Plan. Addressed in this report in response to submissions on the Strategic Directions.
Natural and Built Environment Act, August 2023	Now repealed.	Not addressed in the Proposed Plan
Spatial Planning Act August, 2023	Now repealed	Not addressed in the Proposed Plan

National Policy Statement on Highly Productive Land, September 2022	Now operative	Not specifically addressed in the Proposed Plan, however there is a Versatile Soils chapter which addresses effects on soils and therefore partly addresses the NPS-HPL. In the E-plan there are non-District Plan layers, which include maps of transitional highly productive land developed in accordance with the NPS. Addressed in this report in response to submissions on the Strategic Directions.
Water Services Entities Act 2023	Now repealed	Not addressed in the Proposed Plan.
Proposed Natural Hazard Decision Making 2023	Out for public consultation until Nov 2023.	Not addressed in the Proposed Plan. Not addressed in this report as there are no relevant submissions.
National Policy Statement on Urban Development 2020	Now Operative	Has been considered as part of the Proposed Plan.
National Environmental Standards for Commercial Forestry 2023	Now Operative	Has not been specifically addressed in the Proposed Plan. Not addressed in this report as there are no relevant submissions. However, this will be addressed where relevant in other chapters.
National Environmental Standards for Greenhouse Gas Emissions from Industrial Process Heat 2023	Now Operative	Not addressed in the Proposed Plan. Not addressed in this report as there are no relevant submissions. However, this will be addressed where relevant in other chapters.

2.2 Trade Competition

23. Under the RMA, councils are not to have regard to trade competition in preparing or changing plans (RMA s74(3) and s6 Schedule 1). There are no known trade competition issues raised within the submissions and trade competition is not considered relevant to the strategic directions and urban form and development provisions of the PDP.

3 Consideration of Submissions and Further Submissions

3.1 Overview

24. There were 143 primary submission points on the Strategic Directions (SD) chapter and Urban Form and Development (UFD) chapter and 103 further submission points.

3.1.1 Report Structure

25. The submissions on the SD and UFD chapters raised some general issues, but were principally applied to a particular provision. I have therefore structured this report principally on a provision-by-provision basis (as opposed to a topic basis), following the layout of the SD and UFD chapters, noting where an issue has already been assessed.

26. Further submissions have been considered in the preparation of this report, but in general, they are not specifically mentioned because they are limited to the matters raised in original submissions and therefore the subject matter is canvassed in the analysis of the original submission. Further submissions may however be mentioned where they raise a valid matter not addressed in an original submission. Further submissions are not listed within **Appendix B**. Instead, recommendations on the primary submissions automatically indicate whether a further submission is accepted or rejected as follows:

- Where a further submission supports a primary submission and the primary submission is recommended to be accepted, or where a further submission opposes a primary submission and the primary submission is recommended to be rejected, the further submission is recommended to be accepted.
- Where a further submission supports a primary submission and the primary submission is recommended to be rejected, or where a further submission opposes a primary submission and the primary submission recommended to be accepted, the further submission is recommended to be rejected.
- Where a further submission supports or opposes a primary submission and the primary submission is recommended to be accepted in part, then the further submission is recommended to be accepted in part.

27. I have not individually referenced submissions in support of the provisions. However, where I am recommended changes to a provision, I have correspondingly recommended that the submissions in support of a provision are accepted in part.

28. The following evaluation should be read in conjunction with the summaries of submissions and the submissions themselves. Where I agree with the relief sought and the rationale for that relief, I have noted my agreement, and my recommendation is provided in the summary of submission table in **Appendix B**. Where I have undertaken further evaluation of the relief sought in a submission(s), the evaluation and recommendations are set out in the body of this report. I have provided a marked-up version of the chapters with recommended amendments in response to submissions as **Appendix A**.

29. This report only addresses definitions that are specific to the SD and UFD chapters. However, as indicated later in this report, there are no submissions seeking changes to PDP definitions that relate solely to the SD or UFD chapters.

3.1.2 Format for Consideration of Submissions

30. For each identified topic, I have considered the submissions that are seeking changes to the PDP in the following format:
 - Matters raised by submitters, together with the submission point in square brackets;
 - Assessment;
 - Summary of recommendations;
 - Recommended amendments to the PDP; and
 - S32AA evaluation, where relevant and at a level of detail appropriate to the changes being proposed.
31. Clause 10(2)(b), Schedule 1 of the RMA provides for consequential changes arising from the submissions to be made where necessary, as well as any other matter relevant to the PDP arising from submissions. Consequential changes recommended under clause 10(2)(b) are footnoted as such.
32. Clause 16(2), Schedule 1 of the RMA allows a local authority to make an amendment to a proposed plan without using a Schedule 1 process, where such an alteration is of minor effect, or may correct any minor errors. Any changes recommended under clause 16(2) are footnoted as such.
33. The recommended amendments to the relevant chapters are also set out in **Appendix A** of this report where all text changes are shown in a consolidated manner.

3.2 General Submissions

3.2.1 Matters raised by submitters

34. There were many submissions points characterised as 'general' on the PDP. Of these, there were two submission points which specifically mentioned strategic directions or had a clear 'line of sight' or relationship to the SD or UFD chapter and these are assessed below. There was also one submission point identified as general against the SD Chapter which sought changes. In addition, there were three submissions in support on the SD Chapter classified as general as set out in the table in **Appendix B**.
35. Forest & Bird [156.2] supports the provisions of the PDP that manage effects of climate change including SD-O3, however they consider that the PDP should be amended to provide more strength on climate change matters and statutes and to have regard to the Emissions Reduction Plan and National Adaptation Plan and that areas that contain threatened and at-risk native species and indigenous biodiversity more broadly are considered, particularly within the Natural Hazards and Risks chapter and Strategic Directions.
36. Woolworths [242.1] considers the PDP should enable supermarket activities through a consenting pathway. This would include amending the strategic directions to provide a positive framework for establishing new business zoned land. The thrust of this general submission is also covered in their submission seeking a new UFD Objective (Woolworths [242.10]) which I have addressed under the UFD Chapter.

37. Te Rūnanga o Ngāi Tahu [185.16] consider the objective for mana whenua (SD-O5) is limited to the topic and is not integrated enough to provide guidance on how to address issues when the activity impacts more than one strategic objective. The submitter considers that the isolation of mana whenua to one objective will impact its ability to be considered. The submitter seeks to amend the Strategic Directions to provide guidance for activities that impact more than one objective, particularly mana whenua values.

3.2.2 Assessment

38. Regarding the submission by Forest & Bird [156.2], this submission raises the same matters as submission [156.39] also by Forest and Bird on SD-O3. I have assessed submission [156.2] when assessing submission [156.39] under Objective SD-O3 in section 3.7.
39. Regarding the submission by Woolworths [242.1], I understand that 242.1 is to be addressed in Hearing B (zones). In that hearing, if supermarkets are recommended to be enabled via a consenting pathway and changes are consequentially required to the strategic directions as a result of that recommendation, they can be considered at that time. As such, I have not covered it here.
40. Regarding the submission by Te Rūnanga o Ngāi Tahu [185.16], SD-O5 (Mana Whenua) sets out district plan requirements at a strategic direction level to reflect the relationship of Kāti Huirapa and their culture and traditions with their ancestral lands, water, sites, Wāhi tapu, and other taonga. It includes a broad range of matters that are of interest to mana whenua. As set out in the introduction to the SD chapter, all the strategic directions objectives are to be read together and therefore SD-O5 will apply irrespective of whether the specific matters are contained within specific strategic directions objectives. The stated approach deliberately does not provide a hierarchy or provide guidance or a mechanism to resolve conflict between strategic directions. This was purposeful as to do so would have led to long and complicated provisions.
41. The Section 32 Report Strategic Directions Chapter (May 2022) considered the requirements for Strategic Directions, including the matter of primacy. It states (section 3.1):

The PTDP contains strategic directions and urban form and development objectives consistent with the NPS requirements set out earlier in section 2.2.1. These objectives identify and address districtwide sustainable management priorities for the district, give overarching direction, and ensure those matters are addressed to achieve the outcomes sought by higher-order planning documents.

It is noted that there is nothing in the NPS to suggest that there is a hierarchy amongst objectives that must or may be included in the proposed plan or that there is a requirement that they are assessed against each other. Chapter 7, cl 1(b) simply stipulates those objectives that address key strategic matters for the district and guide decision making at a strategic level must be located under the strategic heading. The NPS does not suggest that strategic objectives be any more than to guide decision making at a strategic level. In addition, there is nothing in the NPS preventing a district council from determining how they wish their strategic objectives to be interpreted.

Given the above, and due to interpretation queries arising in relation to other recently developed Canterbury district plans, it is considered appropriate to provide an interpretation and application statement in the Strategic Directions and Urban Form and Development

Chapters.”

42. In assessing Te Rūnanga o Ngāi Tahu's submission I have considered whether it is desirable and indeed possible to provide robust guidance for activities that impact more than one objective, particularly mana whenua values, at a strategic direction level that is divorced from any specific proposal and accompanying detailed assessment. One approach to assess this is to apply a first principles approach examining the hierarchies contained in the RMA itself and then the various provisions in the hierarchy of instruments promulgated under the RMA (e.g. the National Policy Statements, NESs, Regional Policy Statements, and regional plans). I consider such an exercise would be very difficult to undertake given the myriad of competing provisions across the planning hierarchy.

I have examined the following other local district plan Strategic Directions chapters that have been prepared under the National Planning Standards for examples on how this could be done:

- Proposed Waimakariri District Plan
 - Proposed Mackenzie District Plan
 - Proposed New Plymouth District Plan draft n
 - Proposed Porirua District Plan
43. These District Plans have different hierarchy or primacy statements applying to their Strategic Direction Chapters. None contain a stated hierarchy between provisions within the Strategic Direction Chapter itself. Only the Proposed Porirua District Plan provides guidance on how to reconcile competing strategic directions, stating: “the objectives, policies and rules in Parts 2 and 3 of the District Plan implement the strategic objectives and reconcile any tensions between them.” Under this approach it is the detailed chapters themselves in the district wide and area specific sections that are be used to reconcile inconsistency or conflict between the strategic directions. In my opinion this is what would happen for the PDP in the absence of any stated guidance and was the anticipated approach.
44. I consider that the assessment of competing provisions has to be made specifically in relation to the matter being considered – it is too difficult to do this at a strategic level. Assessing competing provisions is a normal part of plan administration and I note that interpretation guidance is readily available, including through case law. However, I consider it would be beneficial to explicitly include relevant assessment matters in the detailed chapters that expressly enable consideration of mana whenua matters contained in SD-O5 where this is relevant, and I have recommended that the natural hazards provisions should be amended to achieve this in response to submissions on SD-O4. Accordingly, I recommend that this submission is accepted in part.

3.2.3 Summary of recommendations

45. I recommend that the submission from Te Rūnanga o Ngāi Tahu [185.16] is accepted in part.
46. I recommend that the submissions in support of the chapter are **accepted**.

3.2.4 Recommended Changes to the District Plan

47. No changes are recommended.

3.2.5 S32AA assessment

48. No changes are recommended.

3.3 Definitions

49. There are no definitions that relate solely to the SD or UFD chapters. As such, I consider the definition submissions are best dealt with as part of the definitions chapter or the detailed topic specific chapters.
50. I note that Enviro NZ [162.5] identified that they have made a submission on the definition of 'regionally significant infrastructure'. This definition submission will be dealt with by the relevant chapter author (Infrastructure Chapter) as it has implications for that chapter.

3.4 Strategic Directions Introduction

3.4.1 Matters raised by submitters

51. There were two submission points in support of the introduction as set out in **Appendix B**. There were three submission points seeking amendments.
52. Transpower [159.25] considers it is critical that the PDP clearly states the purpose of the Strategic Direction chapter 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 SD objectives and because it is clear there is no hierarchy within the SD objectives. However, the submitter suggests that the 'interpretation' section should be explicit on the role of the SD objectives. Transpower seeks the following changes:

Amend the 'Interpretation' section in Strategic Directions Chapter as follows:

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 and the consideration of notices of requirement for designations):

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;

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 or between the strategic objectives and the objectives and policies in other chapters of the Plan.

53. Te Rūnanga o Ngāi Tahu [185.15] states that the chapter seems to rely on the Growth Management Strategy (GMS) for the District, however there is little provision for iwi growth and development within the document. They request that the chapter does not solely rely on the GMS but also Iwi Management Plans and treaty obligations to partner with iwi to allow for growth and development on mana whenua land. They seek the following amendment:

Amend SD - Strategic Direction, Introduction as follows:

This section sets out the overarching directions for the sustainable management of growth, land use and development of the Timaru District.

[...]

These provisions have been informed by iwi management plans and the Timaru District 2045 Growth Management Strategy which addresses growth and development in the district and sets out a spatial framework for its management. They support achieving a district that has a sustainable lifestyle, a thriving and innovative economy and a strong identity.

3.4.2 Assessment

54. Regarding the Transpower [159.25] submission, I consider that the changes proposed by Transpower provide greater clarity on the intended application of the strategic directions and I therefore recommend the submission is accepted, with the changes as set out below and in **Appendix A**.
55. Regarding the Te Rūnanga o Ngāi Tahu [185.15] submission, the Timaru District 2045 Growth Management Strategy is specifically referenced as it has guided growth and development and is a document that might otherwise not be recognised if not listed. By contrast, the strategic directions have been informed by many statutory documents such as various national policy statements, and the Canterbury Regional Policy statement (CRPS), as well as the Iwi Management Plan. The introduction does not list these other matters that the PDP has to consider and as such it would be incongruous to specifically identify Iwi Management Plans over these other documents. I note that Treaty obligations and partnership opportunities with iwi apply irrespective of the District Plan's strategic directions and that growth opportunities are identified in SD-O5 for development in Māori Reserves. I therefore recommend that this submission is rejected.

3.4.3 Summary of recommendations

56. I recommend that the submission from Transpower [159.25] is **accepted**.
57. I recommend that the submission from Te Rūnanga o Ngāi Tahu [185.15] is **rejected**.
58. Given the changes I am recommending (including the change in response to Te Rūnanga o Ngāi Tahu [185.19] covered under SD-O4), I recommend that the submissions in support of the introduction as set out in **Appendix B** are **accepted in part**.

3.4.4 Recommended Changes to the District Plan

59. Amend the Introduction as follows:

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 and the consideration of notices of requirement for designations):

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;

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 or between the strategic objectives and the objectives and policies in other chapters of the Plan.

3.4.5 S32AA assessment

60. I consider that the original s32 evaluation still applies. I consider that the recommended changes are not significant and that they simply provide greater clarity on the intended application of the strategic directions objectives and are consistent with the existing introduction. Overall, I consider the recommended amended introduction is the most appropriate way to achieve the purpose of the RMA.

3.5 Objective SD-O1 Residential Areas and Activities

3.5.1 Matters raised by submitters

61. Eighteen submission points were received on SD-O1. Of these, six were in support while twelve sought changes.

62. Fonterra [165.25] seeks to amend SD-O1 Residential Areas and Activities as follows:

[...]

ii. limited rural lifestyle development opportunities are provided where they concentrate and are attached to existing urban areas, achieve a coordinated pattern of development, avoid reverse sensitivity effects on existing and permitted rural activities and are capable of efficiently connecting to reticulated sewer and water infrastructure; and

[...]

63. Silver Fern Farms [172.12] and Alliance Group [173.11] seek the addition of a new clause as set out below to better consider incompatible activities:

SD-O1 Residential Areas and Activities

[...]

iv. The location of new residential areas and activities avoids creating conflict with incompatible zones and activities.

64. Connexa [176.31], Spark [208.31], Chorus [209.31] and Vodafone [210.31] seek to amend SD-O1 to consider infrastructure more generally, as they consider that more than sewer and water infrastructure is necessary to service rural lifestyle development. They seek the following amendment:

SD-O1 Residential Areas and Activities

i. There is sufficient residential development capacity [...]

ii. 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

[...].

65. Federated Farmers [182.28] seeks to amend SD-O1 as set out below as they consider there needs to be protection from urban sprawl on highly productive land:

[...]

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, while recognising the productive capabilities of the soils and location.

AND

Any consequential amendments required as a result of the relief sought.

66. Te Rūnanga o Ngāi Tahu [185.17] seeks to amend SD-O1 Residential Areas and Activities to better reflect the functional need for some activities and growth to occur outside the urban area.

67. Dept. Corrections [239.6] seeks to amend SD-O1 as follows:

i. There is sufficient residential development capacity in existing and proposed urban areas to meet demand and household choice, provided through:

...

i. a wide range of housing types and sizes.

68. Singline and RSM Trust [27.1] and Ford et al [33.2] supported SD-O1 on the basis that that the necessary sewer and water infrastructure extensions be completed by the Timaru District Council.¹ Both these submissions were coded as seeking amendments.

3.5.2 Assessment

69. Regarding the proposed amendment by Fonterra [165.25], I agree that reverse sensitivity effects on existing and permitted rural activities is a matter for consideration when considering new rural lifestyle development opportunities. However, in my opinion it would be more appropriate to consider significant reverse sensitivity effects, rather than all reverse sensitivity effects. GRUZ-P5 seeks to manage sensitive activities in the General Rural Zone to avoid adverse effects on primary production or 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 activities. UFD-O1(x) seeks to control the location of activities, primarily by zoning, to minimise conflicts between incompatible activities and avoid these where there may be significant adverse effects. Both of these provisions are less absolute than the submitter is proposing for SD-O1, appearing to allow for some adverse effects to occur. I also note that if considering all reverse sensitivity effects this would potentially foreclose all rural residential opportunities. Part of the reason for locating rural residential activity around existing towns is to minimise effects on productivity, including fragmentation and reverse sensitivity. I therefore recommend that this submission is accepted in part, with SD-O1 amended as set out below in my recommendations section and in **Appendix A**.

70. Regarding the submission by Silver Fern Farms [172.12] and Alliance Group [173.11], I agree that the location of new residential areas and activities should address conflict with incompatible

¹ Greenfield, McCutcheon, Tarrant, Sullivan and Ellery [34.1] supported SD-O1 with the same proviso, however this submission was coded in support.

zones and activities. As identified above, I note that UFD-O1(x) seeks to control the location of activities, primarily by zoning, to minimise conflicts between incompatible activities and avoid these where there may be significant adverse effects. Because this existing UFD objective and GRUZ-P5 referred to above appear to allow for some adverse effects to occur I recommend adding the suggested clause, but with the word 'significant' included as set out in my recommendations section below. Accordingly, I recommend these submissions are accepted in part, with SD-O1 amended as set out below in my recommendations section and in **Appendix A**.

71. Regarding the submissions by Connexa [176.31], Spark [208.31], Chorus [209.31] and Vodafone [210.31], SD-O1 focusses on Council infrastructure and the sometimes-significant adverse environmental effects that can arise when private water and wastewater schemes are used (including over allocation of water and contamination from ecoli and nitrates). The adverse effects from not connecting to power, phone and internet connections are not apparent from the submissions. I note that integration with infrastructure is important and is an example of good planning practice for full urban development and note that this is already covered by SD-O8. However, this is less so for rural lifestyle developments which is the subject of this clause. I note that CRPS Policy 5.3.5 seeks to ensure that development is appropriately and efficiently served for the collection, treatment, disposal or re-use of sewage and stormwater, and the provision of potable water by avoiding development which will not be served in a timely manner to avoid or mitigate adverse effects on the environment and human health. SD-O1 directly responds to that requirement. I also note the further submitter comments from G Morton [11.15FS]² that there are a number of cost effective and reliable satellite/wireless internet options available and that therefore specific provision for reticulated fibre within SD-O1 is unnecessary and not supported. On balance and in the absence of evidence supporting the change, I recommend that these submissions are rejected.
72. Regarding the submission by Federated Farmers [182.28], I agree that it is important to recognise the productive capabilities of the soils and location when considering rural lifestyle development, noting the recent gazettal of the NPS-HPL. I note that clause SD-O1(ii) already provides some protection for versatile soils as it only provides for limited rural lifestyle development opportunities where they concentrate and are attached to existing urban areas. I also note that UFD-O1(vii) seeks to minimise the loss of versatile soils as part of considering settlement patterns, while SD-O9 seeks to protect versatile soils for productive uses. I am comfortable adding this requirement into SD-O1 and therefore recommend that this submission is accepted and SD-O1 is amended as per the submitters request as set out below in my recommendations section and in **Appendix A**.
73. Regarding the submission by Te Runanga o Ngai Tahu [185.17], unfortunately no wording is provided as a suggested amendment. While I accept that there is sometimes a functional need for activities and growth to occur outside of urban areas, I consider that this can be achieved through a resource consent pathway. I note that SD-O9 covers rural areas and clause (iv) specifically refers to a functional/operational need to locate in the rural area, consistent with the submitters comments. In addition, SD-O5 supports the use of Māori reserve land and there is a Māori purpose zone that provides for the use of Māori reserve land. Also, MPZ-P6 supports

² A number of other further submitters made similar further submissions on this matter. I have not referenced them here.

future Māori purpose zones. As such, I consider that the SD chapter already provides for some activities to occur outside of urban areas. I therefore recommend that this submission is rejected.

74. Regarding the submission by Dept. Corrections [239.6], I note that SD-O1 already includes a reference to housing choice in the chapeau. In addition, clause (i)(b) already refers to a range of densities. As such, whilst I consider it important to enable a range of housing types and sizes, I consider this is already captured in SD-O1. I therefore recommend this this submission is rejected.
75. Regarding the submissions by Singline and RSM Trust [27.1] and Ford et al [33.2], their support for the provision as worded is noted, however the provision of sewer and water infrastructure is provided in accordance with the relevant Council infrastructure policy and is not part of the District Plan. As such, I recommend these submissions are accepted in part.

3.5.3 Summary of recommendations

76. I recommend that the submission from Federated Farmers [182.28] is **accepted**.
77. I recommend that the submissions from Fonterra [165.25], Silver Fern Farms [172.12], Alliance Group [173.11], Singline and RSM Trust [27.1] and Ford et al [33.2] are **accepted in part**.
78. I recommend that the submission from Te Rūnanga o Ngāi Tahu [185.17], Dept. Corrections [239.6], Connexa [176.31], Spark [208.31], Chorus [209.31] and Vodafone [210.31] are **rejected**.
79. Given the changes I am recommending, I recommend that the submissions in support of SD-O1 as set out in **Appendix B** are **accepted in part**.

3.5.4 Recommended Changes to the District Plan

80. Amend Objective SD-O1 as follows:

Amend **SD-O1 Residential Areas and Activities** as follows:

[...]

ii. limited rural lifestyle development opportunities are provided where they concentrate and are attached to existing urban areas, achieve a coordinated pattern of development, avoid significant reverse sensitivity effects on existing and permitted rural activities, recognise the productive capabilities of the soils and their location and are capable of efficiently connecting to reticulated sewer and water infrastructure; and

iii. [...]; and

iv. the location of new residential areas and activities avoids creating significant conflict with incompatible zones and activities.

3.5.5 S32AA assessment

Relevance

81. Better management of reverse sensitivity effects will help achieve more efficient and effective management of natural resources, as does recognising the productive capabilities of soils and location. The recommended changes provide greater consistency with the NPS-HPL and help the Council achieve its statutory functions.

Feasibility

82. The proposed amendments provide greater clarity on the outcomes sought and therefore provide more guidance for decision making and therefore improved feasibility. The changes are more consistent with the PDP chapter provisions and the NPS-HPL and can be achieved as a Council function.

Acceptability

83. Reverse sensitivity, incompatible activities and recognising the productive capacity of soils and location are already proposed to be managed by the PDP and so the proposed amendments do not impose any additional costs, uncertainty or risk. The changes are more consistent with the PDP chapter provisions and the NPS-HPL.

Conclusion

84. I consider that the recommended changes provide greater clarity and are consistent with the intent of the objective and the Rural Chapter provisions. Overall, I consider the recommended amended objective is the most appropriate way to achieve the purpose of the RMA.

3.6 Objective SD-O2 – The Natural and Historic Environment

3.6.1 NPS-IB

85. Of relevance to this objective is the July 2023 gazettal of the NPS-IB, which replaced the exposure draft NPS-IB that was in place at the time the PDP was drafted. Both documents are very similar, however of relevance to the Strategic Directions Chapter, the objectives are different, with the exposure draft seeking to protect, maintain, and restore indigenous biodiversity while the gazetted version seeks to maintain indigenous biodiversity so that there is at least no overall loss.³
86. There are other more detailed changes that may be of relevance to the PDP's more detailed indigenous biodiversity provisions. It is therefore anticipated that the Ecosystems and Indigenous Biodiversity Chapter s42A report will explore the differences in greater detail and, if required recommend further changes to the SD-O2 than those arising from submissions directly on this objective.

3.6.2 Matters raised by submitters

87. Ten submission points were received on SD-O2. Four submission points were received in support, while six submission points sought amendments.
88. Forest & Bird [156.38] seek that historical and cultural values are separated from natural environmental values in the PDP via having separate objectives and also seek to recognise the contribution that historic heritage makes to the district.
89. Fonterra [165.26] seeks to amend the reference to 'significant heritage' in clause (vii) to 'historic heritage'.

³ In my assessment later in this section of Dir. General Conservation's submission [166.18] I have prepared a table showing the changes between the two NPS-IB versions for the draft provisions referenced in the submission.

90. The Dir. General Conservation [166.18] 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, consistent with the draft NPS-IB (Policy 14). The Dir. General Conservation also seeks that SD-O2 sets 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 and that the wording 'restored' is added to (v) and (vi) in line with the CRPS (Objective 9.2.2) and the draft NPS-IB (Clause 3.21) which requires Local Authorities to promote the restoration of indigenous biodiversity. The Dir. General Conservation seeks the following amendments:

The District's natural and historic environment is managed so that:

i. the health and wellbeing of the community are recognised as being linked to the natural environment;

ii. [...].;

iii. [...].;

iv. [...].;

x. there is an overall net gain in the quality and quantity of indigenous ecosystems and habitat, and indigenous biodiversity;

v. significant indigenous vegetation and significant habitats of indigenous fauna are identified, and their values recognised, protected, ~~and where appropriate,~~ enhanced, and, where the ecological integrity is degraded, restored;

y. indigenous biodiversity is maintained and enhanced; with all indigenous biodiversity having improved connectivity and improved resilience.

vi.-the life-supporting capacity of ecosystems and resources is safeguarded for future generations;

vii.-[...].

91. Silver Fern Farms [172.13] considers this objective restates parts of s.5 and s6 of the RMA and therefore its value is unclear, and that the use of "important" landscapes and features, is inconsistent with 'outstanding' natural features and landscapes as per s.6 RMA. The submitter seeks to amend SD-O2 to provide meaningful direction beyond simply restating Part 2 of the RMA and to apply thresholds of 'protection' that accord with Part 2.
92. ECan [183.16] considers the objective is inconsistent with CRPS Policy 12.2.1 as it only refers to important landscapes and not outstanding natural features and landscapes. ECan seeks to amend SD-O2 to include reference to the identification and protection of outstanding natural features and landscapes.
93. Te Rūnanga o Ngāi Tahu [185.18] notes that the definition of historic heritage includes sites of significance to Māori, however mana whenua consideration is not present in this objective. They seek to amend SD-O2 to better reflect the relationship of Kāti Huirapa and their culture and traditions with their ancestral lands, water, sites, Wāhi tapu, and other taonga.

3.6.3 Assessment

94. Regarding the submission by Forest and Bird [156.38], given the strategic directions objectives are high level in nature and cover a wide breadth of topics, many topics have been purposefully grouped in the objectives. I accept that historical and cultural values could be separated from natural environmental values, however no strong argument is provided in support of this amendment. I note that the contribution of historic heritage is already recognised in SD-O2(vii). In the absence of evidence on this matter, I recommend that this submission is rejected.
95. Regarding the submission by Fonterra [165.26], the Historic Heritage chapter refers to historic heritage, significant historic heritage and highly significant historic heritage. I note that HH-O2 seeks that historic heritage items and their settings are protected from inappropriate subdivision, use, and development. Given the clear direction in HH-O2 and the variable use of 'significant' and 'highly significant' in the Historic Heritage chapter, I agree that SD-O2 should be amended by replacing 'significant' with 'historic'. However, I consider that it is both the item and its values that are required to be protected. I therefore recommend this submission is accepted in part, with the changes to SD-O2 set out below and in **Appendix A**.
96. Regarding the submission by the Dir. General Conservation [166.18], I note that the submission references the draft NPS-IB. The final NPS-IB has now been gazetted and the referenced draft provisions are either exactly the same or substantially the same as those in the gazetted NPS-IB as set out below. In my opinion the differences (if any) are not relevant to an assessment of the Dir. General Conservation's submission on SD-O2. For this reason, I have not referenced the draft NPS-IB provisions in my assessment, but rather have referenced the final gazetted NPS-IB version.

Exposure Draft NPS-IB	Gazetted NPS-IB
Policy 4: Indigenous biodiversity is resilient to the effects of climate change.	Policy 4: Indigenous biodiversity is managed to promote resilience to the effects of climate change.
Policy 5: Indigenous biodiversity is managed in an integrated way, within and across administrative boundaries.	Policy 5: Indigenous biodiversity is managed in an integrated way, within and across administrative boundaries.
Policy 8: The importance of maintaining indigenous biodiversity outside SNAs is recognised and provided for.	Policy 8: The importance of maintaining indigenous biodiversity outside SNAs is recognised and provided for.
Policy 13: Restoration of indigenous biodiversity is promoted and provided for.	Policy 13: Restoration of indigenous biodiversity is promoted and provided for.
Policy 14: Increased indigenous vegetation cover is promoted in both urban and non-urban environments.	Policy 14: Increased indigenous vegetation cover is promoted in both urban and non-urban environments.
Clause 3.21 Restoration (1) Local authorities must include objectives, policies, and methods in their policy statements and plans to promote the restoration of indigenous biodiversity, including through reconstruction of areas. (2) The objectives, policies, and methods must prioritise all the following for restoration:	Clause 3.21 Restoration (1) Local authorities must include objectives, policies, and methods in their policy statements and plans to promote the restoration of indigenous biodiversity, including through reconstruction of areas. (2) The objectives, policies, and methods must prioritise all the following for restoration:

<p>(a) SNAs whose ecological integrity is degraded: (b) threatened and rare ecosystems representative of naturally occurring and formerly present ecosystems: (c) areas that provide important connectivity or buffering functions: (d) wetlands whose ecological integrity is degraded or that no longer retain their indigenous vegetation or habitat for indigenous fauna: (e) any national priorities for indigenous biodiversity protection.</p> <p>(3) Local authorities must consider providing incentives for restoration in priority areas referred to in subclause (2), and in particular where those areas are on Māori lands, in recognition of the opportunity cost of maintaining indigenous biodiversity on that land.</p> <p>(4) Local authorities must consider imposing or reviewing restoration or enhancement conditions on resource consents and designations relating to activities in areas prioritised for restoration.</p>	<p>(a) SNAs whose ecological integrity is degraded: (b) threatened and rare ecosystems representative of naturally occurring and formerly present ecosystems: (c) areas that provide important connectivity or buffering functions: (d) natural inland wetlands whose ecological integrity is degraded or that no longer retain their indigenous vegetation or habitat for indigenous fauna: (e) areas of indigenous biodiversity on specified Māori land where restoration is advanced by the Māori landowners: (f) any other priorities specified in regional biodiversity strategies or any national priorities for indigenous biodiversity restoration.</p> <p>(3) Local authorities must consider providing incentives for restoration in priority areas referred to in subclause (2), and in particular where those areas are on specified Māori land, in recognition of the opportunity cost of maintaining indigenous biodiversity on that land.</p> <p>(4) In relation to activities in areas prioritised for restoration, local authorities must consider: (a) requiring conditions for restoration or enhancement on resource consents that are new or being reviewed; and (b) recommending conditions on any new designations.</p>
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97. The gazetted NPS-IB Policy 13 seeks that the restoration of indigenous biodiversity is promoted and provided for while Objective 2.1(1)(b)(iii) seeks the restoration of indigenous biodiversity where necessary to achieve the overall maintenance of indigenous biodiversity. As such I consider that SD-O2(v) should be amended to more closely align with the NPS-IB restoration requirements as the submitter suggests. Regarding the proposed addition of clause (y), I agree that the maintenance and enhancement of indigenous biodiversity is a s31 function of territorial authorities and as such I am comfortable adding this requirement into SD-O2. However, I do not agree with adding the words “with all indigenous biodiversity having improved connectivity and improved resilience” as this is a component or method of enhancement, and maintenance and enhancement can be achieved via other methods (for example pest control). Regarding the proposed new clause (x) requiring an overall net gain in the quality and quantity of indigenous ecosystems and habitat, and indigenous biodiversity, this is more than NPS-IB Objective 2.2(1)(a) seeks, which is at least no overall loss in indigenous biodiversity, nor is it clear that this will be achieved by the PDP given the rules that permit some indigenous vegetation clearance (e.g. ECO-R1, ECO-R2 and ECO-R3). I note that NPS-IB Policy 14 seeks that increased indigenous vegetation

cover is promoted in both urban and non-urban environments, but this is not the same as achieving an overall net gain in the quality and quantity of indigenous ecosystems and habitat, and indigenous biodiversity. I therefore do not support this proposed change. Overall, I recommend this submission is accepted in part, with the changes to SD-O2 as set out below and in Appendix A.

98. Regarding the submission by ECan [183.16], the term 'important' encompasses outstanding natural features and landscapes as well as other landscapes. It therefore gives effect to both CRPS Objective 12.2.1 (Identification and protection of outstanding natural features and landscapes) as well as CRPS Objective 12.2.2 (the identification and management of other important landscapes that are not outstanding). This was done purposefully and I consider it is appropriate. I also note that the general purpose of the SD Chapter is not to provide specific policy on the subject, rather this is left to the topic specific chapters. I therefore recommend the submission by ECan is rejected.
99. Regarding the submission by Silver Fern Farms [172.13], as set out above in response to ECan's submission [183.16], 'important' landscapes and features are not defined but encompass outstanding natural features and landscapes as well as other landscapes. The detail is provided by the NFL chapter. The submission appears to seek contradictory outcomes – it considers that SD-O2 restates the RMA and therefore its value is unclear and then seeks it be amended to apply thresholds of 'protection' that accord with Part 2 of the RMA, but also to provide meaningful direction beyond simply restating Part 2. SD-O2 seeks to cover a range of RMA s6 and 7 matters. I accept the comments made by the submitter, however the tension identified by the submitter is a consequence of providing strategic directions that both have a strong basis in the RMA and the planning hierarchy (so that they are justified) but also which then provide direction beyond the RMA (and are potentially open to challenge for going too far). In addition, they should be pitched at a high level so that they do not conflict with the topic specific chapters that they relate to and, in addition, are succinct. Unfortunately, no wording was suggested in the submission. In the absence of suggested wording, I recommend that this submission is rejected as it is not clear how the competing outcomes of the submission are to be achieved. The submitter is welcome to suggest alternative wording in their evidence.
100. Regarding the submission by Te Rūnanga o Ngāi Tahu [185.18], SD-O5 Mana Whenua sets out district plan requirements at a strategic direction level to reflect the relationship of Kāti Huirapa and their culture and traditions with their ancestral lands, water, sites, Wāhi tapu, and other taonga. I do not agree that this needs to be repeated within SD-O2. As set out in the introduction to the chapter, all the strategic directions objectives are to be read together and therefore SD-O5 will apply irrespective of whether the specific matters are contained within SD-O2 or not. I therefore recommend this submission is rejected.

3.6.4 Summary of recommendations

101. That the submissions by Fonterra [165.26] and the Dir. General Conservation [166.18] are **accepted in part**.
102. That the submissions by Forest and Bird [156.38], Te Rūnanga o Ngāi Tahu [185.18], Silver Fern Farms [172.13], and ECan [183.16] are **rejected**.
103. Given the changes I am recommending, I recommend that the submissions in support of SD-O2 as set out in **Appendix B** are **accepted in part**.

3.6.5 Recommended Changes to the District Plan

104. Amend Objective SD-O2 as follows:

[...]

v. indigenous biodiversity is maintained, enhanced and restored where necessary so that there is at least no overall loss;

vi. significant indigenous vegetation and significant habitats of indigenous fauna are identified, and their values recognised, protected, ~~and where appropriate, enhanced, and~~ where ecological integrity is degraded, restored;

vii. the life-supporting capacity of ecosystems and resources is safeguarded for future generations; and

viii. the important contribution of historic heritage to the District's character and identity is recognised, and ~~significant~~ historic heritage and its values are protected from inappropriate subdivision, use, and development.

3.6.6 S32AA assessment

105. I consider that these changes are minor and therefore the original s32 evaluation still applies. The proposed changes simply state an RMA s31 requirement (clause vi), an NPS-IB requirement (clause v) and align with RMA s6(f) and the Historic Heritage chapter provisions. Overall, I consider the changes are relevant to the matter, useful to include, can be achieved and are reasonable. I consider the recommended amended objective is the most appropriate way to achieve the purpose of the RMA.

3.7 Objective SD-O3 – Climate Change

3.7.1 Matters raised by submitters

106. Eight submissions were received on SD-O3, four were in support while four sought amendments.

107. Port Blakely [94.2] considers there should be recognition of certain land uses which help mitigate the effects of climate change, especially activities which sequester carbon. They seek that SD-O3 is amended by inserting wording to the effect of encouraging land use practices, such as plantation forestry which mitigate the effects of climate change.

108. Forest and Bird [156.39] considers that SD-O3 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, Forest & Bird considers that the objective could be strengthened by setting out how the Plan will have regard to the Emissions Reduction Plan and the National Adaptation Plan.⁴ In their general submission [156.2] Forest and Bird made similar statements applied to the chapter generally.

⁴ I note Transpower supports this request in their further submission [159.17FS].

109. Transpower [159.27] 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. Transpower seeks the following amendments:

The effects of climate change are recognised and an integrated management approach is adopted, including through:

- i. taking climate change into account in natural hazards management;*
- ii. enabling the community to adapt to climate change;*
- iii. encouraging efficiency in urban form and settlement patterns;*
- 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.*

110. Hort NZ [245.38] supports SD-O3 but considers it should reference activities as well as community. Hort NZ seeks SD-O3 is amended as follows:

The effects of climate change are recognised and an integrated management approach is adopted, including through:

- i. taking climate change into account in natural hazards management;*
- ii. enabling the community and activities to adapt to climate change;*
- iii. encouraging efficiency in urban form and settlement patterns.*

3.7.2 Assessment

111. Regarding the submission by Port Blakely [94.2], I note that there are other land uses that could mitigate the effects of climate change in addition to plantation forestry. Because of this I do not recommend listing any particular use. I note that RMA s7(i) covers the effects of climate change, rather than the contributors to climate change, but SD-O3 also seeks to reduce emissions through clause (iii). I consider that clause (iii) could be broadened to also refer to activities that reduce carbon emissions. I therefore recommend that this submission is accepted in part and that SD-O3 is amended as set out below and in **Appendix A**.

112. Regarding the Forest and Bird [156.39] and [156.2] submissions, I agree that enabling native species to adapt to climate change is relevant and a useful goal and I also note NPS-IB Policy 4 seeks that indigenous biodiversity is managed to promote resilience to the effects of climate change. However, it is not clear how ensuring there is room for native species to retreat if necessary, could be provided for within a district plan. Potentially this could be achieved by requiring buffer areas adjacent to SNAs, however this could potentially lock up land that might never be needed, or might not be needed for 100 or more years. Regarding strengthening the objective or the chapter by setting out how the PDP will have regard to the emissions reduction plan and the national adaptation plan, I accept that these documents are not referenced in the chapter. However, the RMA only requires regard to be had to these plans. In addition, I consider that the level of detail required to do this would not sit comfortably within a strategic directions objective and instead should be addressed through the relevant topic chapters, e.g. Transport. I recommend that this is brought to the attention of the topic specific chapters where there is

scope to address this. However, I note that both the SD and UFD chapters already respond to climate change adaptation requirements (as required under national adaptation plan) and seek efficient urban settlement patterns (consistent with the emissions reduction plan).⁵ For the SD Chapter, I recommend that these submissions are rejected. The submitter is welcome to suggest wording in their evidence to show how a district plan can ensure there is room for native species to retreat.

113. Regarding Transpower [159.27], I agree that renewable electricity generation, electricity transmission and distribution play a central role in achieving NZ's decarbonisation requirements. I also consider it should be recognised within the SD or UFD chapter; however it could also fit under SD-O8 Infrastructure. On balance I consider it is better located within SD-O3 as submitted and I therefore recommend that this submission is accepted and SD-O3 is amended as set out below and in **Appendix A**.

114. Regarding the Hort NZ [245.38] submission, 'activities' are intended to be encompassed within enabling the community to adapt to climate change. I consider that the proposed addition of the word 'activities' provides greater clarity and as such I recommend this submission is accepted and SD-O3 is amended as set out below and in **Appendix A**.

3.7.3 Summary of recommendations

115. I recommend that the submissions from Transpower [159.27] and Hort NZ [245.38] are **accepted**.

116. I recommend that the submission from Port Blakely [94.2] is **accepted in part**.

117. I recommend that the submissions from Forest and Bird [156.39] and [156.2] are **rejected**.

118. Given the changes I am recommending, I recommend that the submissions in support of SD-O3 as set out in **Appendix B** are **accepted in part**.

3.7.4 Recommended Changes to the District Plan

119. Amend SD-O3 as follows:

The effects of climate change are recognised and an integrated management approach is adopted, including through:

i. taking climate change into account in natural hazards management;

ii. enabling the community and activities to adapt to climate change;

iii. encouraging efficiency in urban form and settlement patterns and encouraging activities which reduce carbon emissions;- and

iv. recognising the important role renewable electricity plays in achieving New Zealand's net carbon zero target by providing for renewable electricity generation, electricity transmission and electricity distribution.

⁵ See for example: SD-O1 efficient urban form; SD-O3(1) climate change; SD-O3(2) climate change adaptation; SD-O3(3) efficient urban form; SD-O3(4) net carbon zero; SD-O4 natural hazard requirements; UFD-O1(1) efficient settlement patterns; and UFD-O1(3) minimising carbon emissions.

3.7.5 S32AA assessment

Relevance

120. The new provisions are consistent with and give effect to the NPS-REG and NPS-ET and central government climate change policy and are therefore relevant. The recommended changes helpfully recognise that activities can adapt to climate change and reduce carbon emissions and that renewable electricity plays an important role in achieving New Zealand's net carbon zero target and is therefore helpful in responding to climate change.

Feasibility

121. The provisions are able to be achieved as they are a relevant district plan matter to consider.

Acceptability

122. There are no identified changes in costs or benefits for SD-O3 from these changes.

Conclusion

123. Overall, I consider the changes are appropriate and I consider the recommended amended objective is the most appropriate way to achieve the purpose of the RMA.

3.8 Objective SD-O4 – Natural Hazards

3.8.1 Matters raised by submitters

124. There were ten submission points on SD-O4, two were in support and eight sought amendments.

125. Lineage Logistics [107.6] considers that the Council's approach of applying a sea level rise of 1.2m on the basis of NZRCP8.5M is inappropriate and does not reflect the recommendations of the IPCC Sixth Assessment Report and that the requirement or goal in SD-O4 (ii) that development: "is avoided in areas where the risks of natural hazards to people, property and infrastructure are assessed as being unacceptable" is problematic as unacceptable is not defined, a blanket avoidance approach would impose significant costs which would outweigh the benefits, and the approach is inconsistent with Part II of the RMA. They seek the following amendments:

1. Areas subject to sea level rise are identified on the basis of NZ RCP 4.5 Median projections as opposed to NZ RCP 8.5M.

2. Remove SD-O4.ii; or

3. Replace SD-O4.ii with wording that accurately reflects a risk-based approach. The following worded is suggested as an example only:

Managing development to ensure the risks of natural hazards to people, property and infrastructure are acceptable.

4. Such other alternative or additional relief as may be appropriate to give effect to the intent of the submission including, but not limited to, corresponding objectives, policies and rules that implement SD-O4.

126. Forest and Bird [156.40] consider the objective should ensure that natural hazard risks to native species and habitat are identified and appropriately mitigated. They seek amendments to SD-O4 clause (ii) to address this, or the inclusion of an additional clause (no specific wording is provided).

127. Transpower [159.28] supports the objective but considers it should better reflect section 6(h) of the RMA. They seek amendments as follows:

Significant nNatural hazards risks are addressed so that:

[...]

128. Silver Fern Farms [172.14] and Alliance Group [173.12] consider that as drafted clause (iii) could be interpreted as requiring natural hazard mitigation by landowners regardless of any triggering proposal or event. The submitter considers that mitigation is only necessary to facilitate an activity. They seek SD-O4 is amended as follows:

[...]

iii. for other areas, natural hazards risks are appropriately mitigated if necessary to enable a land use, development or subdivision.

129. Te Rūnanga o Ngāi Tahu [185.19] consider that much of the district and Māori Land is subject to natural hazards and note the objective states 'avoid' development in these areas where the risk is 'unacceptable'. They consider the term 'unacceptable' seems to be subjective and could see mana whenua unable to recognise their rakatirataka on their own land. The submitter considers there is little integration between the objectives meaning that they will be hard to implement at a decision making level without clarification within the objective as to how it relates to other objectives within the section. They seek that SD-O4 is amended to better reflect the relationship of Kāti Huirapa and their culture and traditions with their ancestral lands, water, sites, Wāhi tapu, and other taonga.

130. BP Oil et al [196.17] support the principle of Objective SD-O4 in that it recognises that if risks to people, property and infrastructure are unacceptable, development should be avoided, and otherwise, risks should be appropriately managed. They state that the PDP introduces a definition of unacceptable risk which relates solely to 'Major Hazardous Facilities' and where exposure of sensitive activities to an individual fatality risk level exceeds 1 in a million and that this does not relate to natural hazards. As such, they consider that use of the terms 'unacceptable' and 'risk' in clause (ii) of this strategic-level objective that relates to natural hazards is potentially confusing to the Plan user and amendments are suggested accordingly. They seek that SD-O4 is amended as follows:

Natural hazards risks are addressed so that:

i. areas subject to natural hazards and risk are identified;

ii. ~~development is avoided in areas where the risks of natural hazards to people, property and infrastructure are assessed as being unacceptable; and~~

development does not increase risks of social, environmental and economic harm natural hazards are assessed; and

~~for other areas, natural hazards risks are appropriately mitigated.~~

131. Kāinga Ora [229.9] supports this objective in principle, but has some concerns around what is 'unacceptable'. The submitter considers that SD-O4 should be amended to more explicitly refer to unacceptable risk being risks to life and human safety. They seek SD-O4 is amended as follows:

Natural hazards risks are addressed so that:

i. areas subject to natural hazards and risk are identified;

ii. development is avoided in areas where the risks of natural hazards to people, property and infrastructure are assessed as being unacceptable to human health and safety; and

iii. for other areas, natural hazards risks are appropriately mitigated.

3.8.2 Assessment

132. Regarding the submission by Lineage Logistics [107.6], I consider that the wording in SD-O4(ii) already enables a risk-based approach to apply as the risk assessment will determine what is acceptable or unacceptable. Regarding the request that areas subject to sea level rise are identified on the basis of NZ RCP 4.5 Median projections as opposed to NZ RCP 8.5M, SD-O4 does not identify a climate change scenario. I consider this is a matter of detail that is best considered in the natural hazards chapter hearing. I therefore recommend that this submission is rejected, with the climate change scenario considered as part of the natural hazards chapter hearing.

133. Regarding the submission by Forest and Bird [156.40], requiring the assessment and mitigation of natural hazard risks to native species and habitat would be a very significant undertaking. This would include assessing all species and habitats in areas potentially subject to sea water inundation, coastal erosion, fire, drought, wind, increased storm intensity, etc. I note that there is uncertainty as to the exact nature and severity of these effects and how the native species might respond. I consider it impractical to require this task across the district. I note that no specific wording is provided as part of the submission so it is not possible to comment on any proposed wording changes to achieve this. I also note that the CRPS natural hazards chapter is focussed on people, property and infrastructure and does not expressly require consideration of natural hazard risks on native species and habitats, except for Policy 11.3.6 which requires consideration of adverse effects of hazard mitigation works on the natural and built environment. Finally, I note that the PDP only controls the effects of new activities on indigenous biodiversity – it does not manage all other aspects of indigenous biodiversity. Given the impractical nature of the request I recommend that this submission is rejected. Should proposed wording be provided in evidence then this would help to understand how this request could be implemented.

134. Regarding the submission by Transpower [159.28], SD-O4 was drafted with the intention that the natural hazards chapter provided the guidance as to its application to natural hazards, be they significant or not significant. I also note that the PDP's natural hazards chapter refers to significant risk (e.g. NH-O1) and applies a 'significance sieve' in other provisions (for example in NH-P4 through qualifying clauses and NH-P10 through the focus on high hazard areas). However, arguably it also addresses risks that are not significant (e.g. in NH-P2, NH-P5 and NH-P6). I accept that RMA s6(h) refers to 'significant' natural hazards, however s31(1)(b) requires district councils to control the effects of development for the purpose of the avoidance or mitigation of natural hazards, apparently regardless of hazard significance. On balance I consider the current wording is more aligned with the natural hazards chapter as drafted and the RMA requirements. I note that there are submissions on the natural hazards chapter and that should that change as a result

of those, then it may be necessary to revisit SD-O4. On balance, I recommend that this submission is rejected.

135. Regarding the submissions by Silver Fern Farms [172.14] and Alliance Group [173.12], while I understand the concern raised, the PDP is not retrospective and the Plan's rules are only triggered when change is proposed that breaches a rule. SD-O4 is not a rule. As such I do not consider it necessary to amend SD-O4 in the way proposed. If this approach / interpretation was taken, significant change would be required throughout the whole PDP, or alternatively, this one objective would be an outlier. I therefore recommend that this submission is rejected.
136. Regarding the submission by Te Rūnanga o Ngāi Tahu [185.19], I consider that the natural hazards provisions are intended to apply to all land, regardless of whether it is Māori land, a Māori reserve or general land and I consider that this is appropriate. I do not consider it appropriate to enable Māori development and Māori communities to have greater exposure to unacceptable risk than others unless there are compelling reasons to do so. I consider that the term 'unacceptable' is defined by the natural hazards chapter and that it is appropriate to not try and define this complex term covering a range of natural hazards and scenarios at a high level within a single strategic direction. I consider there is value in including a statement in the SD (and UFD) chapter introduction that clarifies that some terms are not defined as it is the topic specific chapters that provide this guidance. I have set out this recommended amendment below and in **Appendix A**.
137. While I generally consider that Māori development and Māori communities should not have a greater exposure to unacceptable hazard risk than others, I do think it is acceptable to include an assessment matter in the Natural Hazards Chapter to expressly enable consideration of mana whenua matters where the site is within a Māori Reserve. It may be that there are alternative solutions that could mitigate the hazard risk in limited circumstances. I therefore recommend that this submission is accepted in part, also noting my recommended amendments in relation to defined terms. However, I have not attempted to amend the Natural Hazards Chapter assessment matters at this time, noting that they are subject to a subsequent hearing. Instead, I recommend that this matter is progressed by the Natural Hazards Chapter s42A author.
138. Regarding the submission by BP Oil et al [196.17], the terms 'unacceptable' and 'risk' are 'defined' by the natural hazards chapter. I consider it is appropriate to not try and define these complex terms covering a range of natural hazards and scenarios within a single strategic direction. The fact that unacceptable risk is defined for major hazardous facilities is not relevant as it clearly does not apply to natural hazards. I do not consider this is confusing. I therefore recommend this submission is rejected.
139. Regarding the submission by Kāinga Ora [229.9], the Natural Hazards chapter purposefully considers impacts on natural hazard sensitive property such as dwellings and places of work. Arguably the amendments proposed by Kainga Ora narrows the objective to effects on human health and safety only. Such a narrowed objective does not explicitly include consideration of the impacts on natural hazard sensitive buildings as an independent consideration and as such I do not consider it is consistent with the approach in the PDP, nor is it consistent with the CRPS which applies to people, property and infrastructure (e.g. Objective 11.2.1). I consider it is appropriate to explicitly consider natural hazard impacts on dwellings, places of work and other buildings as communities still need places to live and work following natural hazard events. As such, I recommend this submission is rejected.

3.8.3 Summary of recommendations

140. I recommend that the submissions of Lineage Logistics [107.6], Forest and Bird [156.40], Transpower [159.28], Silver Fern Farms [172.14], Alliance Group [173.12], BP Oil et al [196.17] and Kāinga Ora [229.9] are **rejected**.

141. I recommend that the submission from Te Rūnanga o Ngāi Tahu [185.19] is **accepted in part**.

142. I recommend that the submissions in support of SD-O4 as set out in **Appendix B** are **accepted**.

3.8.4 Recommended Changes to the District Plan

143. There are no recommended changes to SD-O4.

144. Add the following statement to the SD (and UFD) chapter introduction after the interpretation section:

The Strategic Directions and Urban Form and Development Chapters include some terms that are not defined (for example 'unacceptable' in SD-O4(ii)). This is purposeful, as the interpretive guidance for these terms is provided by the topic specific chapters (for example the Natural Hazards Chapter).

3.8.5 S32AA assessment

145. I consider that the original s32 evaluation continues to apply. I consider that the recommended changes are not significant and that they simply provide greater clarity on the intended application of the strategic directions and urban form and development objectives. As no substantive change is proposed, including to any objective, I have not assessed the change further.

3.9 Objective SD-O5 – Mana Whenua

3.9.1 Matters raised by submitters

146. There were seven submission points on SD-O5, two in support and five seeking amendments.

147. Fonterra [165.29] agrees that the needs of Kāti Huirapa should be provided for within the district. Fonterra considers that 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. Fonterra seeks the following amendments:

v. Māori reserve lands are able to be used by Kāti Huirapa for their intended purposes in a manner that maintains the health and safety of their people;

148. OWL [181.22] 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. 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 as follows:

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:

[...]

iv. Where appropriate, Kāti Huirapa retains, and ~~where appropriate~~ is able to enhance access to their sites and areas of significance; [...]

vi. Where appropriate, Kāti Huirapa are able to carry out customary activities in accordance with tikanga; ...

149. Federated Farmers [182.30] acknowledges the role tangata whenua play, but suggest minor amendments to the objectives to recognise that involvement of iwi and hapu alongside communities will enable better outcomes for the district. Federated Farmers considers it is important for the council to recognise 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. Federated Farmers considers that relationships to develop accessways need to be between the private landowner and hapu, this is something that cannot be created or forced by council. Federated Farmers strongly urge the council to allow these relationships to be created and seek the following amendments:

[...]

iii. the values of identified sites and areas of significance to Kāti Huirapa are recognised and protected Kāti Huirapa retains, and where 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.

AND

Any consequential amendments required as a result of the relief sought.

150. Te Rūnanga o Ngāi Tahu [185.20] considers amendments are necessary to include all cultural resources and all types of Kāti Huirapa land to better achieve these outcomes. The submitter also requests that reference to growth and development of their people is acknowledged here as a desired outcome. They seek that SD-O5 is amended to better reflect the relationship of Kāti Huirapa and their culture and traditions with their ancestral lands, water, sites, Wāhi tapu, and other taonga as well as their aspirations (no suggested wording is provided).

151. Te Tumu Paeroa [240.4] generally supports the objectives in the 'Strategic Direction' chapter. However, they consider that an amendment to SD-O5(iv) is required to ensure all Māori landowners are included. They seek the following amendment:

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:

[...]

iv. Kāti Huirapa and Māori landowners retains, and where appropriate is are able to enhance access to their sites and areas of significance;

3.9.2 Assessment

152. Regarding the submission by Fonterra [165.29], while I accept that reverse sensitivity is generally a matter for consideration in rural areas, the Māori Reserves in the District predate existing and district plan permitted rural and rural industrial activities. The reserves were set aside for a purpose and I do not consider it appropriate to subjugate activities on Māori reserves to these other activities. To do so could constrain achievement of the purpose of the Māori reserves and I note that the existence and location of Māori Reserves is a matter of public knowledge. Furthermore, I note that GRUZ-R1 and MPZ-R3 seek to protect Māori land from the effects of primary production. As pointed out in the further submission by Te Runanga o Ngāi Tahu [185.30FS], the introduction to the MPZ chapter states that one of the main aspirations of the Māori Purpose Zone is to create an enabling planning regime to not only encourage the development and use of the existing Māori land, but to create a place for mana whenua to return to. I therefore recommend that this submission is rejected.
153. Regarding the submission by OWL [181.22], I have reviewed the objectives and policies for public access and esplanades and accept that they include restrictions for public safety (e.g. PA-O1 and PA-P4). I also note that the access identified in PA-P1 and PA-P2 is limited to areas identified in SCHED11 – Schedule of Public Access Provisions and as such it is not district wide. However, I note that SASM-P4 seeks to maintain existing access, and encourage landowners and applicants to explore opportunities and methods to enhance access, for Kāti Huirapa to the identified sites and areas listed in SCHED6 – Schedule of Sites and Areas of Significance to Kāti Huirapa. On balance I consider that the suggested amendments to SD-O5 in relation to public access are acceptable as they better account for the SASM provisions and the PA provisions. Regarding customary activities, SASM-P3 seeks to enable Kāti Huirapa to undertake customary harvest and other cultural practices in identified sites and areas listed in SCHED6 – Schedule of Sites and Areas of Significance to Kāti Huirapa, in accordance with tikaka. As such, I consider the suggested amendment to clause (vi) would be inconsistent with SASM-P3. I also note that under New Zealand Law, permission from the landowner is required for access. I therefore disagree with the proposed amendments to clause (vi). Overall, I recommend that this submission is accepted in part, and is amended as set out below and in **Appendix A**.
154. Regarding the submission by Federated Farmers [182.30], the suggested amendments appear to read as contract clauses and require Kāti Huirapa and landowners to agree to them. This is unusual in a PDP objective. I also note that the suggested amendments are methods, which is also unusual within a PDP objective. Finally, I also note that the changes are not required as under New Zealand Law, permission from the landowner is required for access and development. For these reasons I recommend that this submission is rejected.
155. Regarding the submission by Te Rūnanga o Ngāi Tahu [185.20], I note that SD-O5 was drafted in consultation with Kāti Huirapa. I am unsure of what other cultural resources or other types of Kāti Huirapa land are requested to be referred to. I note that no suggested wording was provided so it is difficult to determine what the amended SD-O5 would provide for. In terms of growth and development, SD-O5(v) already states that Māori reserve lands are able to be used by Kāti Huirapa for their intended purpose so I am unsure of what additional growth and development the submitter is seeking. Also, I do not consider it is the purpose of a district plan to acknowledge that the growth and development of their people is a desired outcome.

156. That type of statement sits more comfortably within a strategy document. Finally, as no wording is provided, I am unsure what changes would be required to SD-O5 to better reflect the relationship of Kāti Huirapa and their culture and traditions with their ancestral lands, water, sites, Wāhi tapu, and other taonga as well as their aspirations. I consider that SD-O5 already does this. For these reasons I recommend that this submission is rejected.

157. Regarding the submission by Te Tumu Paeroa [240.4], this objective is currently focussed on access to sites and areas of significance not owned by Māori landowners. While it is not unreasonable to extend this to situations where access by Māori landowners to their own sites and areas of significance is sought to be enhanced, I am not sure if this is needed as they already own the sites. As such I recommend this submission is rejected.

3.9.3 Summary of recommendations

158. I recommend that the submission by OWL [181.22] is **accepted in part**.

That the submission by Te Rūnanga o Ngāi Tahu [185.20], Federated Farmers [182.30], Te Tumu Paeroa [240.4] and Fonterra [165.29] are **rejected**.

Given the changes I am recommending, I recommend that the submissions in support of SD-O5 as set out in **Appendix B** are **accepted in part**.

3.9.4 Recommended Changes to the District Plan

159. Amend SD-O5 as follows:

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:

[...]

iv. ~~where appropriate~~, Kāti Huirapa, retains, and ~~where appropriate~~ is able to enhance access to their sites and areas of significance;

3.9.5 S32AA assessment

Relevance

160. The proposed provision responds to an RMA matter (s6(d) & (e), s8 and s31) and is therefore relevant.

Feasibility

161. The proposed amendment guides decision makers (along with the PA and SASM chapters) and is an acceptable part of a district plan and within the Council's responsibilities to consider as part of development proposals.

Acceptability

162. The proposed amendments will not impose any greater costs or uncertainty and are therefore acceptable. The recommended amendments enable a merits-based assessment for when access is to be retained and enhanced and enables consideration of public safety and other relevant matters. This is more effective than a blanket enablement approach as health and safety matters and landowner rights can overrule more general access requirements.

Conclusion

163. I consider that the proposed additions to clause (iv) better align with the PDP's public access provisions, whilst still being consistent with RMA s6(d) and (e) and s8. Overall, I consider the recommended amended objective is the most appropriate way to achieve the purpose of the RMA.

3.10 SD-O6 - Business Areas and Activities

3.10.1 Matters raised by submitters

164. There were thirteen submission points on SD-O6, seven in support and six seeking amendments.

165. Synlait [163.2] 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. Synlait seeks the following amendments:

Business and economic prosperity in the District is enabled in appropriate locations, including by:

- i. providing sufficient land for a range of business 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.*
- iii. protecting the purpose and function of Industrial areas.*

OR

wording to similar effect.

166. Fonterra [165.30] considers that the wording of this provision should be amended to provide for existing and new businesses and to also better protect industrial land. Fonterra seeks the following amendments:

Business and economic prosperity in the District is enabled in appropriate locations, including by:

- i. providing sufficient and appropriately located land for ~~to meet the operational requirements of a range of existing and new~~ business activities and 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; and*
- iii. protecting industrial land from inappropriate activities establishing within the zone and protecting the zone interface to avoid reverse sensitivity effects.*

167. Silver Fern Farms [172.15] and Alliance Group [173.13] consider 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. They seek the following amendments:

Business and economic prosperity in the District is enabled in appropriate locations, including by:

- i. providing sufficient land for a range of business and industrial 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 or the viability of industrial zones.*
- iii. avoiding the encroachment of incompatible activities that are sensitive to the effects of commercial and industrial activities.*

168. Dept. Corrections [239.7] considers the objective should ensure other compatible activities such as community corrections activities are provided for. They seek the following amendments:

Business and economic prosperity in the District is enabled in appropriate locations, including by:

- i. providing sufficient land for a range of business activities to cater for projected growth;*
- ii. providing opportunities for a range of business activities and other compatible 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.*

169. White Water [248.2] consider it appropriate to have business and economic property identified as a strategic objective. White Water suggests clause (i) of this Objective can be improved by the addition of the words "at least" prior to the words sufficient land. This amendment is considered more appropriate and, amongst others, to better reflect the National Policy Statement on Urban Development - NPS UD. They seek the following amendments:

Business and economic prosperity in the District is enabled in appropriate locations, including by:

- i. providing at least sufficient land for a range of business activities to cater for projected growth;*
- ii. [...]*

3.10.2 Assessment

170. Regarding the Synlait [163.2] submission, I agree that SD-O6 should protect the purpose and function of industrial areas. However, rather than adding an additional clause (iii), I prefer amending existing clause (ii) (as proposed by Silver Fern Farms [172.15] and Alliance Group [173.13]). I therefore recommend this submission is accepted in part and SD-O6 is amended as set out below and in **Appendix A**.

171. Regarding the Fonterra [165.30] submission, I agree that the wording of this provision should be amended to provide for existing and new businesses, including consideration of operational requirements. However, regarding protecting industrial land from inappropriate activities establishing within the zone and protecting the zone interface to avoid reverse sensitivity effects,

I prefer amending existing clause (ii) (as proposed by Silver Fern Farms [172.15] and Alliance Group [173.13]) rather than including a new separate clause. I therefore recommend this submission is accepted in part and SD-O6 is amended as set out below and in **Appendix A**.

172. Regarding the Silver Fern Farms [172.15] and Alliance Group [173.13] submissions, I agree that the objective should also reiterate the principle of separation between incompatible activities (clause ii), however I do not agree with the addition of 'industrial' to clause (i) as business activities is intended to cover industrial activities. I therefore recommend these submissions are accepted in part and SD-O6 is amended as set out below and in **Appendix A**.

173. Regarding the Dept. Corrections [239.7] submission, I agree with the submitter that it is appropriate to provide for a range of compatible activities in business areas where these do not detract from the role and function of the City Centre and Town Centre zones. I therefore recommend that this submission is accepted and SD-O6 is amended as set out below and in **Appendix A**.

174. Regarding the White Water [248.2] submission, I agree that adding the words 'at least' would more closely align this objective with the NPS-UD. I therefore recommend this submission is accepted and SD-O6 is amended as set out below and in **Appendix A**.

3.10.3 Summary of recommendations

175. That the submission by White Water [248.2] and Dept. Corrections [239.7] are **accepted**.

176. That the submissions by Synlait [163.2], Silver Fern Farms [172.15], Alliance Group [173.13] and Fonterra [165.30] are **accepted in part**.

177. Because of the changes I am recommending to SD-O6, I recommend that the submissions in support of SD-O6 as set out in **Appendix A** are **accepted in part**.

3.10.4 Recommended Changes to the District Plan

Amend SD-O6 as follows:

Business and economic prosperity in the District is enabled in appropriate locations, including by:

i. providing at least sufficient and appropriately located land for to meet the operational requirements of a range of existing and new business activities and to cater for projected growth; and

ii. providing opportunities for a range of business activities and other compatible 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 industrial zones.

3.10.5 S32AA assessment

Relevance

178. The proposed amendments provide additional detail on how business and economic prosperity is to be enabled, which is an RMA issue. The proposed amendments better align the provisions with the NPS-UD. The matter is an acceptable part of a district plan and is within the Council's responsibilities to manage as part of development.

Feasibility

179. The proposed amendments provide additional detail on how business and economic prosperity is to be enabled - they do not change the meaning or intent of the provisions and therefore there is no change to their feasibility.

Acceptability

180. The proposed amendments provide additional detail on how business and economic prosperity is to be enabled - they do not change the meaning or intent of the provisions and therefore there is no change to their acceptability. They do not result in altered costs on the community relative to the proposed provisions.

Conclusion

181. Overall, I consider the recommended amended objective is the most appropriate way to achieve the purpose of the RMA.

3.11 Objective SD-O7 – Centres

3.11.1 Matters raised by submitters

182. Five submissions were received on SD-O7. Two submissions were received in support while three submissions sought amendments.

183. Te Rūnanga o Ngāi Tahu [185.21] considers that there is little integration between the objectives meaning that they will be hard to implement at a decision-making level without clarification within the objective as to how it relates to other objectives within the section. They seek to amend SD-O7 Centres to better reflect the relationship of Kāti Huirapa and their culture and traditions with their ancestral lands, water, sites, Wāhi tapu, and other taonga.

184. Harvey Norman [192.11] generally supports this objective and the recognition that out-of-town-centre development can reduce the viability of the centre. In the case of Timaru, they state that an Environment Court Consent Order established that Large Format Retail activities (subject to certain conditions) will enable the people and communities of the District to provide for their social, economic and cultural wellbeing in a way and at a rate that complements the Timaru CBD. The submitter states that therefore, the commercial LFRZ “hub” at Showgrounds Hill needs to be suitably recognised in the PDP. They seek amendments to SD-O7 Centres to reflect the commercial ‘Large Format Retail’ zone and its ability to function as a complementary hub for retail and commercial activity within the Timaru urban area.

185. Dept. Corrections [239.8] considers the objective should ensure that community activities such as community corrections activities are provided in the District’s city and town centres for to meet the needs of the community. They seek the following amendments:

The District’s city and town centres:

- i. are maintained and enhanced as vibrant, attractive community focal points, providing a high level of amenity and opportunities for social interaction;*

- ii. *are the primary focus for retail, office and other commercial and community activities;*
- iii. *provide for the highest density of business, residential and visitor accommodation, and for intensification opportunities.*

3.11.2 Assessment

186. Regarding the submission Te Rūnanga o Ngāi Tahu [185.21], SD-O5 Mana Whenua sets out district plan requirements at a strategic direction level to reflect the relationship of Kāti Huirapa and their culture and traditions with their ancestral lands, water, sites, Wāhi tapu, and other taonga. I do not agree that SD-O7 needs to be amended to also achieve this. As set out in the introduction to the chapter, all the strategic directions objectives are to be read together and therefore SD-O5 will apply irrespective of whether the specific matters are contained within SD-O7 or not. Noting this, I recommend that this submission is rejected.
187. Regarding the submission by Harvey Norman [192.11], while I agree that Large Format Retail zones can support the community by providing retail activities that might struggle to establish within centres and that therefore these zones can complement the Timaru CBD if properly restricted, I do not agree that this needs to be explicitly recognised in SD-O7. SD-O7 is about centres and the Large Format Retail Zone is not a centre in the centres hierarchy. SD-O6 provides for large format retail activities to establish and prosper, provided they do not detract from the role and function of the City Centre and Town Centre zones. SD-O6 is presumably consistent with the referred to Environment Court consent order which was found to complement the Timaru CBD. I therefore recommend that this submission is rejected.
188. Regarding the submission by Dept. Corrections [239.8], I agree that centres are intended to be the focus for community activities and I therefore recommend that this submission is accepted and SD-O7 is amended as set out below and in **Appendix A**.

3.11.3 Summary of recommendations

189. I recommend that the submission from Dept. Corrections [239.8] is **accepted**.
190. I recommend that the submissions from Harvey Norman [192.11] and Te Rūnanga o Ngāi Tahu [185.21] are **rejected**.
191. Because of the changes I am recommending to SD-O7, I recommend that the submissions in support of SD-O7 as set out in **Appendix A** are **accepted in part**.

3.11.4 Recommended Changes to the District Plan

192. Amend SD-O7 as follows:

The District's city and town centres:

- i. *are maintained and enhanced as vibrant, attractive community focal points, providing a high level of amenity and opportunities for social interaction;*
- ii. *are the primary focus for retail, office and other commercial and community activities;*
- iii. *[...]*

3.11.5 S32AA assessment

193. I consider that the original s32 evaluation continues to apply. I consider that the recommended changes are not significant and are consistent with the objective as worded and the town centre chapter provisions. Overall, I consider the recommended amended objective is the most appropriate way to achieve the purpose of the RMA.

3.12 Objective SD-O8 – Infrastructure

3.12.1 Matters raised by submitters

194. Eighteen submission points were received on SD-O8. Twelve submission points were received in support, while six submissions points sought amendments.

195. Forest and Bird [156.44], considers that emissions reduction should be incorporated in the objective. They seek to amend SD-O8 as follows:

Across the District:

improved accessibility, reduced emissions and multimodal connectivity is provided through a safe and efficient transportation network that is able to adapt to technological changes;

[...]

196. Enviro NZ [162.5] seeks an amendment to support the continuance and operational ability of regional infrastructure including the Redruth landfill (I note that in its further submission [159.26FS] Transpower generally supports the relief sought on the basis that the proposed amendments give effect to Policies 10 and 11 of the NPSET and Policy 16.3.4 of the CRPS). The submission states that 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 SD 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 SD Chapter. They seek the following amendments:

Across the District:

[...]

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 and protecting regionally significant infrastructure from reverse sensitivity. Development is serviced by an appropriate level of infrastructure and waste facilities that effectively meets the needs of that development.

197. Fonterra [165.31] considers that the wording of this provision should be amended to provide for existing and new businesses. They seek the following amendments:

[...]

the provision of new network infrastructure is integrated and co-ordinated with the nature, timing and sequencing of both new development and the growth of existing development;

[...]

Road Metals [169.8] and Fulton Hogan [170.9] oppose SD-O8 as it does not include consideration of activities that provide an important part of the supply chain for critical infrastructure, such as quarries. They seek the following amendments:

i. [...]

v. infrastructure is supported through a readily available, local supply of the physical construction materials requirements of infrastructure.

198. KiwiRail [187.16] seeks an amendment to provide for the protection of regionally significant infrastructure from reverse sensitivity effects. They state that the rail network can be vulnerable to adverse effects when incompatible subdivision, land use and development is located adjacent to an established rail line. They seek the following amendment:

Across the District:

[...].

v. avoid, remedy or mitigate adverse effects, including reverse sensitivity effects, of subdivision, land use and development on regionally significant infrastructure.

3.12.2 Assessment

199. Regarding the submission by Forest and Bird [156.44], SD-O8 already refers to an efficient transportation network that is able to adapt to technological changes and multimodal connectivity. I consider that emissions management is therefore already encapsulated in the objective. I consider it inaccurate to include the words 'reducing emissions' as this will not occur in all instances for the transportation network and emissions reduction is in large part also driven by settlement patterns, as opposed to the network configuration. Encouraging efficiency in urban form and settlement patterns is already covered in SD-O3(iii). I therefore recommend this submission is rejected.

200. Regarding the submission by Enviro NZ [162.5], this objective is about infrastructure, not waste per se. I note that the submitter has sought an amendment to the definition of regionally significant infrastructure. This definition submission will be dealt with by the relevant chapter author (Infrastructure Chapter) as it has implications for that chapter. In terms of amending SD-O8, if the definition is amended then waste services will be captured in SD-O8 and the addition is not required. If not, then I consider waste services are not the focus of SD-O8 and I consider it would not therefore be appropriate to add in a reference to waste services as part of this objective. However, in response to the KiwiRail [187.16] submission below, I am recommending adding in a specific reference to reverse sensitivity and I therefore recommend that this submission seeking change to SD-O8 is accepted in part.

201. Regarding the submission by Fonterra [165.31], clause (ii) is intended to apply to new development, which in my opinion includes the growth of existing development. However, I can see the benefits in making this clearer as per the submission. I therefore recommend that this submission is accepted and SD-O8 is amended as set out below and in **Appendix A**.

202. Regarding the submission by Road Metals [169.8] and Fulton Hogan [170.9], I accept that a readily available, local supply of physical construction materials is beneficial for the construction and operation of infrastructure, however I do not consider this is of strategic importance for the District. Furthermore, given the broad nature of infrastructure, there are many other contributing components that are also not identified. I do not support itemising one component over others

in a strategic direction objective. In addition, 'readily available' is not defined and I do not think the topic chapters implement this proposed addition. For these reasons I recommend these submissions are rejected.

203. Regarding the submission by KiwiRail [187.16] seeking the protection of regionally significant infrastructure from reverse sensitivity effects, I consider this is already covered by clause SD-O8(iv). In my opinion reverse sensitivity effects are adverse effects. However, I consider that greater clarity can be provided by including a reference to reverse sensitivity effects in clause (iv). I therefore recommend that this submission is accepted in part and SD-O8 is amended as set out below and in **Appendix A**.

3.12.3 Summary of recommendations

204. That the submissions from Forest and Bird [156.44], Road Metals [169.8] and Fulton Hogan [170.9] are **rejected**.

205. That the submission by Fonterra [165.31] is **accepted**.

206. That the submission from Enviro NZ [162.5] and KiwiRail [187.16] are **accepted in part**.

207. Given the changes I am recommending to SD-O8, I recommend that the submissions in support of SD-O8 as set out in **Appendix B** are **accepted in part**.

3.12.4 Recommended Changes to the District Plan

208. Amend SD-O8 as follows:

Across the District:

- i. improved accessibility and multimodal connectivity is provided through a safe and efficient transportation network that is able to adapt to technological changes;*
- ii. the provision of new network infrastructure is integrated and co-ordinated with the nature, timing and sequencing of both new development and the growth of existing development;*
- iii. drinking water supplies are protected from the adverse effects of subdivision, use and development; and 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, including reverse sensitivity effects, appropriately.*

3.12.5 S32AA assessment

Relevance

209. I consider that the proposed amendments provide greater clarity on the application of the objective, and are consistent with the objective as worded. They do not change the meaning or intent of the provisions. They respond to an RMA issue and can be achieved through a district plan and the Council's functions and responsibilities and are therefore relevant.

Feasibility

210. The proposed amendments provide greater clarity and are therefore useful and helpful for decision making. There are no changes to risk from the proposed amendments. They can be

achieved through a district plan and the Council's responsibilities and are therefore considered to be feasible.

Acceptability

211. There are no changes to the costs from the proposed amendments and they are therefore considered to be acceptable.

Conclusion

212. Overall, I consider the recommended amended objective is the most appropriate way to achieve the purpose of the RMA.

3.13 Objective SD-O9 - Rural Areas

3.13.1 Matters raised by submitters

213. Eighteen submission points were received on SD-O9. Three submission points were in support, while fifteen sought amendments.

214. Singline and RSM Trust [27.12] is concerned that SD-O9(vi), which requires the Future Development Area overlay remains available for future urban or rural lifestyle development, imposes a number of significant restrictions on land use and land activities until rezoning occurs. They seek that FDA9 will have a 2-year priority.

215. Helicopters Sth Cant. [53.12] and the NZAAA [132.12] support the enabling of primary production, protection of versatile soils and the management of reverse sensitivity. However, they consider that it is unclear what the undefined term 'intensive activities' is but the focus should be that sensitive activities don't affect primary production. They seek the following amendments:

A range of ~~primarily~~ primary 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. protecting versatile soils for productive uses;

~~ii. managing the adverse effects of intensive activities on sensitive activities;~~

~~iii. managing the adverse effects of new sensitive activities on primary production; ensuring that sensitive activities do not adversely affect primary production, including reverse sensitivity effects;~~

[...]

216. Ballance [86.4] support enabling primary production activities in the rural environment. They state that the clause refers to 'primarily productive activities' which is not the same as 'primary production activities' and therefore seek revision of this. They state that in clause (ii), 'intensive activities' are referred to but are not defined which introduces confusion as to the intent of this clause. To avoid confusion the submitter considers this clause either needs to be removed or revised to provide clarification and clause (iii), needs to include reverse sensitivity as a potential effect. They seek the following amendments:

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. protecting versatile soils for productive uses;*
- ~~*ii. managing the adverse effects of intensive activities on sensitive activities;*~~
- ~~*iii. ii. managing the adverse effects, including reverse sensitivity effects, of new sensitive activities on primary production;*~~

[...]

217. Dairy Holdings [89.5] support recognition of the importance of rural areas in a strategic objective as it is a significant resource management matter for the district, but considers the provisos are not necessary for a strategic direction, which should be suitably high-level. They seek the following amendments:

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. protecting versatile soils for productive uses;*~~
- ~~*ii. managing the adverse effects of intensive activities on sensitive activities;*~~
- ~~*iii. managing the adverse effects of new sensitive activities on primary production;*~~
- ~~*iv. avoiding activities that have no functional/operational need to locate in the rural area;*~~
- ~~*v. identifying and maintaining the character, qualities and amenity values of rural areas;*~~
- ~~*vi. ensuring Future Development Area overlay remains available for future urban or rural lifestyle development.*~~

218. Radio NZ [152.26] support SD-O9, particularly the direction to avoid activities that have no functional/ operational need to locate in the rural area. However, an amendment is sought to avoid adverse effects of sensitives activities on regionally significant infrastructure and lifeline utilities to recognise that the rural zone is a working area that generates noise, odours and other effects. They seek the following amendment:

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:

[...]

~~*managing*~~ *Avoiding the adverse effects of new sensitive activities on primary production, and Regionally Significant Infrastructure and Lifeline Utilities;*

[...]

219. Forest and Bird [156.45] considers the objective should integrate the protection and maintenance of indigenous biodiversity into the rural area. They seek the following amendments:

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. [...]*

[...]

vii. Protecting and maintaining indigenous biodiversity in rural areas

220. Fonterra [165.32] considers that the wording of this strategic direction should be amended to better protect rural areas for their intended purposes. They seek the following amendment:

~~A range of primarily productive~~ Primary production 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 sensitive activities;
- iii. managing the adverse effects of new sensitive activities on primary production and rural industry;
- iv. avoiding activities that have no functional/ or operational need to locate in the rural area;
- v. identifying and maintaining the character, qualities and amenity values of rural areas;
- vi. ensuring Future Development Area provide for rural activities until rezoned for residential purposes. ~~Overlay remains available for future urban or rural lifestyle development.~~

221. Silver Fern Farms [172.16] and Alliance Group [173.14] consider the objective should recognise activities that support primary production, lest it be constructed in an inappropriately restrictive manner. The submitters also consider 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 that the land use composition of areas changes over time. They seek the following amendments:

~~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 existing sensitive activities;
- iii. managing the adverse effects of new sensitive activities on primary production, rural industry and supporting activities;
- iv. avoiding activities that have no functional/operational need to locate in the rural area;
- v. identifying and ~~maintaining~~ managing the character, qualities and amenity values of rural areas;
- vi. [...]

222. Rural Contractors [178.3] 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). They seek the following amendment:

~~A range of primarily~~Primary productive 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;

[...]

223. Federated Farmers [182.31] supports the recognition of the importance of the primary production sector and the need to protect highly protective soils from inappropriate development. The submitter 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. They seek the following amendments:

[...]

vii Primary production activities are supported by Council to adapt to change required by regulatory and consumer demands

OR

Wording with a similar intent;

AND

Any consequential amendments required as a result of the relief sought.

224. Te Rūnanga o Ngāi Tahu [185.22] considers that there is little integration between the objectives meaning that they will be hard to implement at a decision-making level without clarification within the objective as to how it relates to other objectives within the section. They seek to amend SD-O9 Rural Areas to better reflect the relationship of Kāti Huirapa and their culture and traditions with their ancestral lands, water, sites, Wāhi tapu, and other taonga.

225. Hort NZ [245.40] supports the scope of SD-O9 and the outcomes it seeks to achieve, but seeks deletion of clause (ii) as intensive activities are not defined in the PDP. They seek the following amendments:

~~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. protecting versatile soils~~ highly productive land for productive uses;

~~ii. managing the adverse effects of intensive activities on sensitive activities;~~

~~iii. managing the adverse effects of new sensitive activities on primary production;~~

[...]

226. NZ Frost Fans [255.2] considers that while the objective generally protects highly productive land and associated appropriate land uses well, it needs to better reflect the NPS-HPL and doesn't recognise the priority that is required to be given to land based primary production on highly

productive land. They seek that the Objectives, Policies and Methods of the PDP be amended and/or included to give effect to the NPS-HPL and the following amendments to SD-O9:

A range of ~~primarily~~ predominantly productive activities are enabled in the rural environment ~~to enable that prioritise 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 sensitive activities;*
- ~~iii. managing~~ avoiding the adverse effects of new sensitive activities on primary production;*
- iv. avoiding activities that have no functional/operational need to locate in the rural area;*
- v. identifying and maintaining the character, qualities and amenity values of rural areas;*
- vi. ensuring Future Development Area overlay remains available for future urban or rural lifestyle development.*

3.13.2 Assessment

227. Regarding the submission by Singline and RSM Trust [27.12], SD-O9(vi) seeks to ensure that Future Development Area overlays (FDAs) remain available for future urban or rural lifestyle development, i.e. development proposals in these areas do not foreclose the areas ability to accommodate higher density development in the future. This is consistent with the Future Development Area chapter. I have reviewed that chapter and it generally permits rural activities which would be consistent with the current zoning. It is not clear which restrictions are opposed and therefore it is not possible to determine if these are unnecessary. I consider that it is appropriate to carefully consider development in FDAs to ensure it does not foreclose to ability to develop the area more comprehensively. In addition, rather than change SD-O9, I consider it would be more appropriate to deal with this matter at the chapter level where the rules are housed, or by removing the overlay from the planning map so the FDA restrictions do not apply. For the reasons above, I recommend this submission is rejected.

228. Regarding the submissions by Helicopters Sth Cant. [53.12] and NZAAA [132.12], I accept that it is unclear what the undefined term 'intensive activities' is. This is intended to encompass intensive indoor primary production, intensive outdoor primary production, intensive primary production and intensively farmed stock, all of which are defined terms in the PDP. I do not favour listing all these activities separately in SD-O9, but do agree with adding the words 'production' to be clearer. I disagree with the submitters when they state that the focus of SD-O9 should be that sensitive activities don't affect primary production. The PDP should and does consider the impact of new intensive production activities on existing sensitive activities (e.g. GRUZ-P1(iii), GRUZ-R1 PER4, GRUZ-R2 and GRUZ-R3), and as such I do not agree with deleting clause (ii). Regarding the proposed changes to clause (iii), consistent with my recommendations for SD-O8, I consider it helpful to explicitly refer to reverse sensitivity effects and I note my recommended changes to clause (iii) are consistent with the submission from Ballance Agri-Nutrients Limited [86.4]. Regarding referring to 'primary productive' as opposed to 'primarily productive', not using the defined term 'primary production' was purposeful as this NPS definition includes mining and quarrying activities and these activities are discretionary activities under GRUZ-R24 in the rural zone. It is questionable whether full discretionary status is consistent with 'enabling' primary production and therefore the alternative wording was used. I

therefore do not support this change. Overall, I recommend that that these submissions are accepted in part and SD-O9 is amended as set out below and in **Appendix A**.

229. Regarding the submission from Ballance [86.4], this submission raises the same concerns as Helicopters Sth Cant. [53.12] and the NZAAA [132.12], however proposes some different wording to resolve this. For the reasons set out above for Helicopters Sth Cant. [53.12] and the NZAAA [132.12], I recommend that that this submission is accepted in part and SD-O9 is amended as set out below and in **Appendix A**.
230. Regarding the submission from Dairy Holdings [89.5], I acknowledge that it is a matter of judgement as to how much detail to include or not within a strategic direction objective. However, I consider that subclauses (i) to (vi) provide value when enabling primarily productive activities within the rural environment. I therefore recommend that this submission is rejected.
231. Regarding the submission from Radio NZ [152.26], I agree that it is important to consider the impact of sensitives activities on regionally significant infrastructure and lifeline utilities, however, I note that this is already covered in SD-O8(iv) and that I am proposing to amend SD-O8(iv) to expressly refer to reverse sensitivity effects. The introduction to the chapter explains that all strategic direction objectives are to be considered together and no fixed hierarchy exists between the strategic objectives. I therefore consider that this change to SD-O9 is unnecessary and I recommend that it is rejected.
232. Regarding the submission by Forest and Bird [156.45], I do not consider the changes are necessary as SD-O2 already covers indigenous biodiversity (noting the change I am recommending to SD-O2) and the introduction to the chapter explains that all strategic direction objectives are to be considered together and no fixed hierarchy exists between the strategic objectives. I therefore consider that this change to SD-O9 is unnecessary and I recommend that this submission is rejected.
233. Regarding the submission by Fonterra [165.32], for the reasons outlined above I do not support the change of 'primarily productive' to 'primary production' and I consider reference to a range of activities and to present and future generations is appropriate. I note that no detailed explanation was provided for these proposed wording changes so it is not fully clear why these specific amendments were proposed. Regarding the addition of 'rural industry' to clause (iii), I agree that rural industry is a significant component of the rural productive economy. However, GRUZ-P7 includes a number of constraints for rural industries and GRUZ-R21 makes the activity restricted discretionary. I also note that GRUZ-S4 covers setbacks for sensitive activities and does not refer to rural industry and as such the GRUZ chapter does not manage the adverse effects, including reverse sensitivity effects, of new sensitive activities on rural industry. Including this within SD-O9(iii) would not be consistent with the GRUZ chapter. On balance I consider that rural industry should not be added to clause (iii).
234. With regard to Fonterra's recommended changes to clause (vi) covering Future Development Areas, in my opinion Fonterra's proposed wording does not achieve the outcomes that SD-O9 is trying to achieve for FDAs. The intended focus is not that you can continue to undertake rural activities in accordance with the existing rural zoning (which is already provided for by the underlying zoning), but that you do not foreclose the ability for more intensive development in the future. Fonterra's proposed wording does not achieve this and is not consistent with the Future Development Areas chapter. I consider that it is appropriate to carefully consider development in FDAs to ensure they do not foreclose the ability to develop the area more

comprehensively. If this outcome is not sought then an alternative approach is to remove the overlay from the site, however Fonterra have not sought this. Overall, I recommend that this submission is rejected.

235. Silver Fern Farms [172.16] and Alliance Group [173.14] seek some changes that are similar to Fonterra Limited [165.32] (changes to the chapeau to refer to primary production, removal of references to a range of activities and present and future generations and addition of rural industry in clause (iii)). For the reasons outlined for the Fonterra submission, I recommend that these changes are rejected. Silver Fern Farms [172.16] and Alliance Group [173.14] also seek to add the word 'existing' to clause (ii) to refer to 'existing sensitive activities' so that the burden of mitigation falls to new sensitive activities locating in the rural environment, not already established rural activities. I consider that this is how SD-O9(ii) is supposed to be interpreted, and I note GRUZ-P5 and GRUZ-S4 clearly seek to put restrictions on new sensitive activities. I agree that the wording addition helps to clarify this and I therefore recommend that this change is made. Finally, the submitters seek to change 'maintaining' to 'manage' in clause (v) as they consider that maintenance will not always be practicable or desirable, given the land use composition of areas changes over time. In my opinion, while I accept that land use composition changes over time, the character, qualities and amenity values of rural areas are informed by rural activities, which the plan envisages and enables in rural areas. I note that GRUZ-P2 seeks to maintain the character and qualities of the zone through specified methods and this is implemented via the rules. I consider that 'maintain' enables rural character changes as long as the activities remain rural and that this is more consistent with the chapter specific direction. I therefore recommend that this specific change is rejected. Overall, I recommend that SD-O9 is amended to include the word 'existing' in clause (ii) and therefore that these submissions are accepted in part.
236. Regarding the Rural Contractors [178.3] submission, the changes requested seek to enable activities that support and protect primary production activities (e.g. rural industry). For the reasoning set out under the Fonterra [165.32] submission, I recommend that this submission is rejected.
237. Regarding the Federated Farmers [182.31] submission, while I have sympathy for the proposed objective to support changes in land practice to address biosecurity, climate, and environmental demands, I do not agree that this is something the Council (and therefore the ratepayer) should be required to support. It is not clear what this support would be, nor how it would be implemented. I consider that the proposed objective is too broad and goes beyond the role of a district plan in committing the Council to an action. I therefore recommend that this submission is rejected.
238. Regarding the submission from Te Rūnanga o Ngāi Tahu [185.22], as per my responses to similar submissions from this submitter, SD-O5 Mana Whenua sets out district plan requirements at a strategic direction level to reflect the relationship of Kāti Huirapa and their culture and traditions with their ancestral lands, water, sites, Wāhi tapu, and other taonga. I do not agree that SD-O9 needs to be amended to also achieve this. As set out in the introduction to the chapter, all the strategic directions objectives are to be read together and therefore SD-O5 will apply irrespective of whether the specific matters are contained within SD-O9 or not. Noting this, I recommend that this submission is rejected.
239. Regarding the Hort NZ [245.40] submission, as set out earlier in response to Helicopters Sth Cant. [53.12] and the NZAAA [132.12], I have recommended that the word 'production' is added to

clause (ii) to help clarify what are intensive activities. Regarding changing 'versatile soils' to 'highly productive land', I agree that highly productive land is more appropriate as this is the wording used in the recently gazetted NPS-HPL. I therefore recommend that this submission is accepted in part and SD-O9 is amended as set out below and in **Appendix A**. I note that this change would need to be replicated in the versatile soils chapter.

240. Regarding the submission by NZ Frost Fans [255.2], I consider that there is very little difference in meaning between 'predominantly' and 'primarily' (Google dictionary defined 'predominantly' as meaning mainly; for the most part; and defined 'primarily' as for the most part; mainly). Because of this, I prefer the notified wording (i.e. 'primarily'). Regarding whether to 'prioritise' or 'enable' primary production, I note that the District Plan 'enables' some activities through the chapter policies and rules and in so doing, 'prioritises' these activities over other activities (through imposing a consenting hurdle). As such, the existing approach does prioritise productive activities over other activities. I consider that 'prioritise' is a stronger word that more clearly sets out what is to be achieved. I therefore support this change. Regarding changing 'managing' to 'avoiding' in clause (iii), I note the GRUZ-P5 seeks to manage sensitive activities, and specifically refers to mitigation where avoidance is not possible. As such, amending clause (iii) as proposed would be inconsistent with GRUZ-P5 and the rules that implement it. I therefore do not support this change. Overall, I recommend that 'enable' is replaced with 'prioritise', but that none of the other changes are made. I therefore recommend that this submission is accepted in part and SD-O9 is amended as set out below and in **Appendix A**.

3.13.3 Summary of recommendations

241. I recommend that the submissions from Helicopters Sth Cant. [53.12], NZAAA [132.12], Ballance [86.4], Silver Fern Farms [172.16], Alliance Group [173.14], Hort NZ [245.40] and NZ Frost Fans [255.2] are **accepted in part**.

242. I recommend that the submissions from Singline and RSM Trust [27.12], Dairy Holdings [89.5], Radio NZ [152.26], Forest and Bird [156.45], Rural Contractors [178.3], Federated Farmers [182.31], Fonterra [165.32] and Te Rūnanga o Ngāi Tahu [185.22] are **rejected**.

243. Given the changes I am recommending to SD-O9, I recommend that the submissions in support of SD-O9 as set out in **Appendix B** are **accepted in part**.

3.13.4 Recommended Changes to the District Plan

244. Amend SD-O9 as follows:

A range of primarily productive activities are enabled in the rural environment to ~~enable~~ prioritise the ongoing use of land for primary production for present and future generations, while:

- i. protecting ~~versatile soils~~ highly productive land or productive uses;*
- ii. managing the adverse effects of intensive production activities on existing sensitive activities;*
- iii. managing the adverse effects, including reverse sensitivity effects, of new sensitive activities on primary production;*

[...]

3.13.5 S32AA assessment*Relevance*

245. The proposed changes better align with the NPS-IB and improve clarity. They address relevant RMA issues. The proposed amendments can be achieved through a district plan and the Council's functions. They are therefore relevant.

Feasibility

246. The proposed changes provide additional clarity on the application of the objective and therefore are useful for decision makers. They do not increase any uncertainty or risk and are therefore feasible.

Acceptability

247. The proposed changes do not increase any costs and are consistent with higher order planning documents and are therefore acceptable.

Conclusion

248. Overall, I consider the recommended amended objective is the most appropriate way to achieve the purpose of the RMA.

3.14 SD-O10 - Community and Open Space**3.14.1 Matters raised by submitters**

249. Two submission points were received on SD-O10. One submission was in support and one sought amendments.

250. PrimePort [175.16] considers it is not appropriate for public access along the coastal marine area within the operational area of the Port of Timaru. They consider that this is appropriately reflected in the proposed provisions for public access and esplanade reserves and should be similarly reflected in this objective. They seek the following amendments:

A range of recreational, social and community facilities and open spaces that meet the long-term needs of the community are enabled, including:

- 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*
- ii. the provision of a network of facilities and open spaces to support densification and new growth areas, including co-location.*

3.14.2 Assessment

251. Regarding the submission by PrimePort [175.16], I do not agree with specifically referencing the Port of Timaru within this objective. However, I agree that this objective is not consistent with the public access provisions contained within the public access chapter such as PA-O1 and PA-P4 which include restrictions for public safety and I therefore recommend that this submission is accepted in part and Objective SD-O10 is amended as set out below and in **Appendix A**.

3.14.3 Summary of recommendations

252. I recommend that the submission by PrimePort [175.16] is **accepted in part**.

253. Given the changes I am recommending, I recommend that the submission in support of SD-10 is accepted in part as set out in **Appendix B**.

3.14.4 Recommended Changes to the District Plan

254. Amend SD-O10 as follows:

A range of recreational, social and community facilities and open spaces that meet the long-term needs of the community are enabled, including:

[...]

i. where appropriate, the provision of public access to and along the coastal marine area and margins of identified rivers; and

ii. [...]

3.14.5 S32AA assessment*Relevance*

255. The proposed change provides greater direction on an RMA issue, provides additional clarity on the application of the objective and is more consistent with the topic specific provisions in the PA Chapter and is therefore relevant.

Feasibility

256. There is no change in the level of uncertainty or risk and the topic can be achieved through the Council's functions and responsibilities. It is therefore feasible.

Acceptability

257. The proposed change does not increase any costs and aligns with the topic specific provisions in the PA Chapter and is therefore acceptable.

Conclusion

258. Overall, I consider the recommended amended objective is the most appropriate way to achieve the purpose of the RMA.

3.15 UFD – Urban Form and Development**3.15.1 Matters raised by submitters**

259. 27 submissions points were received on UFD-O1. Four submission points were in support and 23 sought amendments.

260. ECan [183.19] considers a number of the objectives and policies in the Future Development Area (FDA) chapter are relevant at a strategic level, and should be incorporated in the SD Chapter, and/or the UFD chapter. ECan considers that these two chapters are extremely important when considering applications for private plan changes. In addition, ECan considers that more detail is required to ensure that the NPS-UD is given effect and meaning in the local context. They seek

that the Council reconsider the objectives and policies and consider movement of relevant objectives and policies from the Future Development Areas chapter to the SD Chapter and/or UFD Chapter, and ensure the provisions give effect to the NPS-UD and meaning is provided in the local context.

261. ECan [183.20] supports UFD-O1 but submits that the reference to versatile soils needs to be changed to refer to highly productive land to be consistent with the NPS-HPL and to address housing choice to reflect Objective 5.2.1b of the CRPS. They seek SD-O1 is amended as follows:

A consolidated and integrated settlement pattern that:

[...]

vi. avoids areas with important natural, cultural and character values;

vii. minimises the loss of versatile soils protects highly productive land;

[...]

AND

2. All references in the Plan to "versatile soils" should be changed to "highly productive land" and the provisions made consistent with the NPS-HPL 2022.

AND

*3. Amend **UFD-O1** to recognise housing choice as an outcome for settlement patterns.*

262. ECan [183.21] opposes that there is no minimum yield for new urban areas in the plan, arguing that minimum yields are an important part of ensuring that a range of housing choices are provided, that infrastructure is developed in an efficient manner, and that the rural land resource on the urban fringe is also developed so that it is maximised. They seek an amendment to include a new policy UFD-PX, to ensure that housing in Future Development Areas is developed with a minimum yield of 12 household per hectare over the area of an FDA, and provide for a range of densities within the FDA to ensure that housing choice is provided within new development areas.

263. Forest and Bird [156.48] consider adverse effects that remain after they are reduced (i.e. residual effects) through a consolidated and integrated settlement pattern should also apply the mitigation hierarchy in accordance with other provisions of the plan. They seek a new objective as follows:

UFD-OX

Avoids, remedies, or mitigates adverse effects consistent with the provisions of the plan.

264. Forest and Bird [156.47] considers that while it is appropriate to reduce adverse effects on the environment under UFD-O1(iii), it is also important to manage effects. They seek the following amendments:

A consolidated and integrated settlement pattern that:

i. Efficiently accommodates future growth [...];

ii. It is integrated with the efficient use of infrastructure;

iii. Reduces and manages adverse effects on the environment, including energy consumption, carbon emissions and water use;

265. Woolworths [242.10] seeks that the PDP support and enable future re-zoning of land for commercial and mixed-use purposes (this is consistent with Woolworth's general submission [242.1]). Woolworths considers that currently there is no strong directive within the UFD Chapter to accommodate plan changes if / when the short, medium and long-term business land needs of the District change over time. The submitter considers that the PDP should err on the side of oversupplying business land. They seek an additional objective as follows:

UFD-O2 Business Growth

Any new areas to support commercial and mixed use, or industrial activities shall primarily occur where:

i. There is a demonstrated need for additional suitable development capacity;

ii. A diverse range of services and opportunities is provided for to respond to any specific social and economic needs;

iii. The type, scale and function of new commercial areas are consistent with, and complementary to, the Centre network;

iv. The location, dimensions and characteristics of the land are appropriate to support activities that are anticipated within the zone.

266. TDC [42.13] supports the objective, particularly clause (iv) which is consistent with the directives of Objective SD-O8. However, it considers a minor amendment to clause (ii) of UFD-O1 is warranted as the notified version of the clause appears to be incomplete. They seek the following amendment:

A consolidated and integrated settlement pattern that:

[...]

ii. is integrated and co-ordinated with, and ensures the efficient use of, infrastructure;

[...]

267. Speirs, B [66.17] considers the objective should be consistent with the NPS-HPL. The following amendments are requested:

A consolidated and integrated settlement pattern that:

[...]

vii. minimises the loss of ~~versatile~~ highly productive soils;

[...]

268. Hort NZ [245.41] supports the outcome sought of a consolidated and integrated settlement pattern. The submitter considers that with the NPS-HPL coming into effect on 17 October 2022, Highly Productive Land is defined as per the meaning in clause 3.5(7) and the plan should align with that definition. They seek the following amendments:

A consolidated and integrated settlement pattern that:

i....;

[...]

vi. avoids areas with important natural, cultural and character values;

vii. minimises the loss of ~~versatile soils~~ highly productive land;

viii. enables papakāika, to occur on ancestral lands;

[...]

269. Waka Kotahi [143.19] acknowledges that the objective seeks to achieve a consolidated and integrated settlement pattern, which the submitter supports. However, Waka Kotahi considers there is a contradiction between achieving this pattern and recognising the existing character of an area which is most likely to be low density residential development. They seek the following amendment:

A consolidated and integrated settlement pattern that:

[...]

v. is well designed, of a good quality, ~~recognises existing character and amenity~~ and is attractive and functional to residents, business and visitors.

[...]

270. Transpower [159.30] supports the objective but considers amendments are required to remove the lack of clarity in clause (iii), which is also considered overly onerous and not an approach required by the NPS-UD. Also, Transpower notes their suggested change to clause (x) will remove the requirement to 'avoid', which is inconsistent with the 'minimise' approach taken elsewhere in the PDP. They seek the following amendments:

A consolidated and integrated settlement pattern that:

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;

ii. is integrated with the efficient use of infrastructure;

iii. reduces adverse effects on the environment, including energy consumption, carbon emissions and water use;

[...]

x. controls the location of activities, primarily by zoning, to manage ~~minimise~~ conflicts between incompatible activities ~~and avoid these where there may be significant adverse effects.~~

271. Fonterra [165.33] considers that reference to reverse sensitivity effects ensures that the impact of sensitive activities on business is recognised (not just the effects of business which are typically industry, on sensitive activities). They seek the following amendment:

[...]

x. controls the location of activities, primarily by zoning, to minimise reverse sensitivity effects and conflicts between incompatible activities and avoid these where there may be significant adverse effects.

272. Silver Fern Farms [172.17] and Alliance Group [173.15] seek minor amendments to ensure that the avoidance clauses are appropriately focussed. They seek the following amendments:

A consolidated and integrated settlement pattern that:

[...]

vi. avoids significant adverse effects on areas with important natural, cultural and character values;

[...]

ix. avoids locating new growth in areas where the impacts from natural hazards are unacceptable and natural hazard risk cannot be acceptably mitigated ~~or which would require additional hazard mitigation;~~ 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.

273. Connexa [176.33], Spark [208.33], Chorus [209.33] and Vodafone [210.33] consider it is unclear what 'efficient use of infrastructure' is. The submitters consider that a consolidated and integrated settlement pattern that is integrated with infrastructure is clearer and more appropriate. They seek the following amendments:

consolidated and integrated settlement pattern that:

i. efficiently accommodates future growth and capacity [...].;

ii. is integrated with ~~the efficient use of~~ infrastructure;

[...].;

274. Te Rūnanga o Ngāi Tahu [185.23] considers there should be amendments to make this objective consistent with the Strategic Direction objectives and the policies of the various plan chapters. They seek the following amendments:

A consolidated and integrated settlement pattern that:

[...]

xi. improve accessibility and connectivity for people through services, and transport including walking and cycling routes;

xii. promotes positive effects, and avoids, remedies, or mitigates adverse effects (including cumulative effects), of urban development on the health and well-being of water bodies, freshwater ecosystems, and receiving environments.

275. Kāinga Ora [229.13] considers clause (iii) should be amended to reflect terminology used in the RMA. Kāinga Ora is also concerned that the lower level provisions do not adequately give effect to UFD-O1, in particular the Future Development Areas. They seek the following changes:

A consolidated and integrated settlement pattern that:

- 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;*
- ii. is integrated with the efficient use of infrastructure;⁶*
- iii. ~~reduces~~ minimises adverse effects on the environment, including energy consumption, carbon emissions and water use;*

[...]

AND

Ensure that lower-level provisions (specifically those relating to Future Development Areas) give effect to UFD-O1.

276. Te Tumu Paeroa [240.5] generally supports the objectives in the 'Urban Form and Development' chapter, however considers that ancestral lands needs to be defined to preclude ambiguity within the PDP. They seek the following amendments:

A consolidated and integrated settlement pattern that:

[...]

viii. enables papakāika, to occur on ancestral lands and Māori land;

[...]

277. White Water [248.3] opposes that Future Development Areas have not been referred to within UFD-O1, as they have been specifically identified as appropriate areas for greenfield growth within the District. The submitter considers that the objective should confirm that development within FDA's achieves a consolidated and integrated settlement pattern. They seek the following amendments:

A consolidated and integrated settlement pattern that:

i. efficiently accommodates future growth and capacity for commercial, industrial, community and residential activities, primarily within the urban areas of the Timaru township, future development areas and the existing townships of Temuka, Geraldine, and Pleasant Point;

ii. [...]

AND

Such other alternative relief that gives effect to the intent of the submission.

278. The MoE [106.7] requests explicit provision is given to educational facilities throughout the District in urban development to manage the impacts of development on educational facilities, in particular impacts on school capacity. They consider that the Council has an obligation under the NPS-UD to ensure sufficient additional infrastructure (which includes schools) is provided in

⁶ Note: the words 'of infrastructure' is already included in clause 2 of UFD-O1 so this recommended addition is presumably underlined by mistake.

urban growth and development (see Policy 10 and 3.5 of Subpart 1 of Part 3: Implementation, in particular). They seek the following amendments:

A consolidated and integrated settlement pattern that:

i. efficiently accommodates future growth and capacity for commercial, industrial, community, educational and residential activities, primarily within the urban areas of the Timaru township, and the existing townships of Temuka, Geraldine, and Pleasant Point;

[...]

3.15.2 Assessment

279. Regarding the submissions by ECan [183.19] given the way the SD and UFD chapters are to be interpreted (i.e. in combination with the specific chapter provisions including the FDA Chapter), I do not consider it necessary to repeat provisions from the FDA chapter in these chapters. Furthermore, I note that whereas UFD-O1 covers various desired environmental outcomes from accommodating growth, the FDA chapter includes coverage of activities within FDAs prior to urban development and the process for urban development within the FDAs. I do not consider these specific and process matters need to be repeated in the strategic directions. However, I do see value in including a new clause on unanticipated or out of sequence development as this is a key urban growth strategic component of this chapter. I therefore recommend that this submission point is accepted in part, with the proposed amendments set out below and in **Appendix A**.

280. Regarding the addition of the reference to highly productive land (ECan [183.20]), I agree that this is required given the recent gazettal of the NPS-HPL, however I consider it appropriate to change the reference to versatile soils to highly productive land rather than add it. Regarding adding a requirement to provide housing choice, I agree that this would be appropriate as it is good planning and gives effect to the CRPS (Objective 5.2.1(2)(b)) and the NPS-UD. I consider providing business choice is also appropriate. I therefore recommend that this submission point is accepted and UFD-O1 amended as set out below and in **Appendix A**.

281. Finally, regarding the inclusion of a minimum of 12 households per hectare over the area of an FDA (ECan [183.21]), I note that under the CRPS there are minimum requirements for Greater Christchurch under Chapter 6 (Policy 6.3.7(3)) but not for the Timaru area which is covered by Chapter 5. I have reviewed the FDA, Residential and Subdivision chapters of the PDP and have not identified a minimum subdivision density requirement in those chapters. While I consider it is good planning practice to encourage or even require minimum densities of urban development where there are significant urban growth pressures and limited growth opportunities available, I am not aware that these pressures and restrictions are a relevant consideration for the Timaru District. I note that FDA-P4 covers the benefits of urban consolidation/intensification to support a quality compact urban form and therefore there is some direction on density in that provision. I also note that the FDAs have to go through a plan change process and that minimum density could be resolved at that stage on a case-by-case basis when site attributes and location can be considered in detail. Finally, I note further submission comments stating that such an approach is too prescriptive and inflexible, could prevent innovative land development solutions, may not be appropriate on the fringes of smaller rural townships and make developments possible only

by large developers rather than enabling more bespoke developments.⁷ In the absence of evidence on this matter I recommend that this submission point is rejected.

282. Regarding the submission by Forest and Bird [156.48] as this objective is to be applied along with the other strategic objectives and provisions in the chapters I do not consider there is any value to be gained from amending UDF-O1 as proposed to avoid, remedy, or mitigate adverse effects consistent with the provisions of the plan. I also note the comments in the further submission by Silver Fern Farms [172.2FS] and others who question the value of this proposed objective in light of the topic-specific objectives and policies provided throughout the PDP and the general duty to manage effects under RMA s17. I therefore recommend that this submission is rejected.
283. Regarding submission point [156.47] seeking to also manage adverse effects on the environment (clause (iii)), in response to Kāinga Ora's [229.13] submission (see below) I have recommended that 'reduce' is changed to 'minimise' as it is not always possible to 'reduce' adverse effects on the environment when changing land uses from rural to urban. I consider 'minimise' also responds to the submitters request to manage effects as it manages these by minimising them. I therefore recommend this submission point is accepted in part and UDF-O1 is amended as set out below and in **Appendix A**.
284. Regarding the submission by Woolworths [242.10] to support and enable future re-zoning of land for commercial and mixed-use purposes, I note that the FDA chapter sets out the anticipated areas for growth in the District and the requirements for this growth. It also contains a policy (FDA-P5) on the requirements for out-of-sequence growth which includes requirements for business development. As such, I consider that the PDP already covers future business growth and that this does not need to be repeated in the UDF Chapter. I therefore recommend that this submission is rejected.
285. Regarding the submission by TDC [42.13], I consider that the additions of the words 'co-ordinated' 'and ensures' are consistent with the intent of the objective and help clarify its application. I therefore recommend this submission is accepted and UDF-O1 is amended as set out below and in **Appendix A**.
286. Regarding the submission by Hort NZ [245.41] and Spiers, B [66.17], I agree that UDF-O1 should refer to highly productive land instead of versatile soils given the promulgation of the NPS-HPL. I therefore recommend that these submissions are accepted and changing UDF-O1 as set out below and in **Appendix A**.
287. Regarding the submission by Waka Kotahi [143.19], I agree with the submitter that there is a contradiction in the objective, specifically that the character may well change as part of new urban development. However, rather than deleting the reference to character as requested, I consider a better approach is to refer to the character and amenity anticipated by the PDP in place of the reference to development being attractive. I consider this more accurate. I therefore recommend that this submission is accepted in part and UDF-O1 is amended as set out below and in **Appendix A**.
288. Regarding the submission by Transpower [159.30], I agree that changing the word 'minimise' to 'manage' is acceptable as this enables the detail to be covered in the topic specific chapters. I do

⁷ For example, J and L Badcock [85.18FS].

not agree with deleting the clause 'and avoid these where there may be significant adverse effects' as I consider this is the appropriate outcome for the objective. I therefore consider that this submission is accepted in part and that UFD-O1 is amended as set out below and in **Appendix A**.

289. Regarding the submission by Fonterra [165.33], I agree with adding in the words 'reverse sensitivity' but consider this is better worded slightly differently to that proposed by the submitter. I therefore recommend that this submission is accepted in part and that UFD-O1 is amended as set out below and in **Appendix A**.
290. Regarding the submissions by Silver Fern Farms [172.17] and Alliance Group [173.15], I agree with adding the words 'significant adverse effects on' as the objective is more accurately focussed on avoiding adverse effects rather than the areas per se. With regard to replacing the clause on additional hazard mitigation with a statement on acceptable mitigation, I consider that some hazard mitigation may well be appropriate and therefore recommend that the clause is amended to refer to significant mitigation instead. This amendment softens, but remains generally consistent with, the existing wording. I do not favour the submitters' wording as it is not clear what 'acceptably mitigated' means and this is not clarified by the Natural Hazards chapter. I therefore recommend that these submissions are accepted in part and UFD-O1 is amended as set out below and in **Appendix A**.
291. Regarding the submission by Connexa [176.33], Spark [208.33], Chorus [209.33] and Vodafone [210.33], while it could be argued that it is not clear what the efficient use of infrastructure is, I consider that this is a relevant and beneficial outcome, particularly in relation to the roading network. The efficient use of infrastructure is generally achieved by higher density development that is carefully located, as opposed to low density development that is not well connected with existing urban redevelopment. I note that CRPS objective 5.2.1(f) refers to efficient and effective use of regionally significant infrastructure while Policy 5.3.2(3)(a) seeks the efficient and effective provision, maintenance or upgrade of infrastructure. As such, the concept of efficient provision / use of infrastructure is referred to in higher order documents. I therefore recommend that these submissions are rejected.
292. Regarding the submission by Te Rūnanga o Ngāi Tahu [185.23], proposed new clause (xii) seeks to manage activities for water quality purposes. Usually this is a regional council function, however, the Council is proposing to manage stormwater quality and quantity through its stormwater management provisions in order to meet its discharge consent requirements and avoid flooding. As such, I consider that there is value in including a clause that recognises this. However, I favour alternative wording to that proposed by the submitter which focusses on the stormwater network as that is the subject of the stormwater chapter provisions. Regarding the proposed new clause (xi) covering accessibility and connectivity, I consider that this is a relevant consideration for this objective which covers settlement patterns and I recommend it is included. Overall, I therefore recommend that this submission is accepted in part and UFD-O1 is amended as set out below and in **Appendix A**.
293. Regarding the Kāinga Ora [229.13] submission, I note that the proposed addition of the words 'of infrastructure' are not required as these words are already in clause (ii). This appears to be an underlining error. Regarding the proposed change of 'reduces' to 'minimise', I agree with this proposed amendment as it provides greater clarity of the outcome being sought and is acceptable in terms of what it is trying to achieve. I also note that when going from greenfield to urban activities it is unlikely that development will always 'reduce' adverse effects on the environment

(such as carbon emissions and energy consumption), but these can be minimised. Regarding Kainga Ora's request that the FDA chapter gives effect to the UFD chapter, as set out earlier in my S42A report, the Strategic Directions and UFD chapters have been drafted with the intention that they are read alongside all other objectives and no hierarchy exists, however, they should however at least be consistent. I note that topic specific chapter authors such as for the FDA chapter will need to consider alignment with the SD and UFD chapters as part of their s42A reporting. As such, I recommend that this part of the submission is rejected. Overall, I recommend that this submission is accepted in part, with the amendments shown below and in **Appendix A**.

294. Regarding the Te Tumu Paeroa [240.5] submission, I note that 'Māori land' is a defined term in the PDP, however 'ancestral land' is not. I consider it likely that Māori land would be considered ancestral land. However, to avoid confusion I recommend that clause viii is amended to replace the reference to ancestral land with the words 'where appropriate', relying on the remainder of the PDP to identify where this is appropriate (for example the Māori Purpose Zone and Māori land). I therefore recommend that this submission is accepted in part with the amendments set out below and in **Appendix A**.
295. Regarding the White Water [248.3] submission I agree that UFD-O1 should refer to Future Development Areas as these are areas where future growth is anticipated. I also agree with the wording proposed by the submitter. I therefore recommend that this submission is accepted and UFD-O1 is amended as set out below and in **Appendix A**.
296. Regarding the MoE [106.7] submission, I agree that the provision of education facilities is a key part of new development and I agree that there is value in explicitly referring to educational facilities in UFD-O1. I therefore recommend that this submission is accepted and UFD-O1 is amended as set out below and in **Appendix A**.

3.15.3 Summary of recommendations

297. I recommend that the submissions of ECan [183.20], Hort NZ [245.41], Speirs, B [66.17], TDC [42.13], the MoE [106.7] and White Water [248.3] are **accepted**.
298. I recommend that the submissions by Transpower [159.30], Forest & Bird [156.47], ECan [183.19], Fonterra [165.33], Waka Kotahi [143.19], Silver Fern Farms [172.17], Alliance Group [173.15] Kāinga Ora [229.13], Te Rūnanga o Ngāi Tahu [185.23] and Te Tumu Paeroa, [240.5] are **accepted in part**.
299. I recommend that the submissions by ECan [183.21], Forest and Bird [156.48], Woolworths [242.10], Connexa [176.33], Spark [208.33], Chorus [209.33], and Vodafone [210.33] are **rejected**.
300. Given the changes I am recommending to UFD-O1, I recommend that the submissions in support of UFD-O1 as set out in **Appendix B** are **accepted in part**.

3.15.4 Recommended Changes to the District Plan

301. Amend UFD-O1 as follows:

A consolidated and integrated settlement pattern that:

- i. efficiently accommodates future growth and capacity for commercial, industrial, community, educational and residential activities, primarily within the urban areas of the Timaru*

- township, future development areas and the existing townships of Temuka, Geraldine, and Pleasant Point;
- ii. is integrated and co-ordinated with, and ensures the efficient use of, infrastructure;
- iii. ~~reduces~~ minimises adverse effects on the environment, including energy consumption, carbon emissions and water use;
- iv. protects drinking water supplies from the adverse effects of subdivision, use and development;
- v. is well designed, of a good quality, ~~recognises existing character and amenity~~ provides housing and business choice, is consistent with the character and amenity anticipated by the plan and is attractive and functional for residents, business and visitors;
- vi. avoids significant adverse effects on areas with important natural, cultural and character values;
- vii. ~~minimises the loss of versatile soils~~ highly productive land;
- viii. where appropriate, enables papakāika, to occur on ancestral lands;
- ix. avoids locating new growth in areas where the impacts from natural hazards are unacceptable or which would require additional significant hazard mitigation; ~~and~~
- x. controls the location of activities, primarily by zoning, to ~~minimise~~ manage conflicts between incompatible activities, including reverse sensitivity effects and avoid these where there may be significant adverse effects;
- xi improves accessibility and connectivity for people through services and transport, including walking and cycling routes;
- xii avoids unanticipated urban development outside of the Future Development Area Overlay or out of sequence development, unless it provides significant development capacity and contributes to a well-functioning urban environment; and
- xiii. manages adverse effects of urban development on the stormwater network.

3.15.5 S32AA assessment

Relevance

302. The addition of a stormwater outcome statement (clause xiii) provides greater alignment with the stormwater chapter provisions, while the changes to clause (v) provide greater alignment with the NPS-UD in relation to existing character and providing housing and business choice. The proposed new clauses (xii) aligns with the FDA Chapter and helps to manage urban growth in a manner that enables the CRPS Chapter 5 provisions to be given effect to. These and the other changes manage RMA issues and assist the Council to achieve its functions under s31. They are therefore considered to be relevant.

Feasibility

303. The proposed changes provide additional clarity on the application of the objective and make it more consistent with the topic specific provisions in the stormwater and FDA chapters. The

recommended amendments will not decrease the effectiveness of UFD-O1 in identifying the desired outcomes for urban development and do not change the level of risk or uncertainty. The proposed amendments can be achieved through a district plan and the Council's functions and responsibilities. Seeking to minimise adverse environmental effects from urban development is more achievable, and therefore feasible, than reducing these when going from greenfield rural to urban activities.

Acceptability

304. The amendments will reduce uncertainty for implementation, recognise that character can change and that adverse effects do not always have to be reduced from the status quo, thereby providing a more appropriate balance between costs and benefits, thereby improving acceptability. I consider that the stormwater addition is neutral as the stormwater chapter provisions already include various onsite stormwater management requirements.

Conclusion

305. Overall, I consider the recommended amended objective is the most appropriate way to achieve the purpose of the RMA.

4 Conclusions

306. Submissions have been received both in support of and in opposition to the SD and UFD Chapters of the PDP.

307. Having considered all the submissions and reviewed all relevant statutory and non-statutory documents, I recommend that the PDP should be amended as set out in Appendix A of this report.


308. For the reasons set out in the Section 32AA evaluation included throughout this report, I consider that the recommended amended objectives and provisions are the most appropriate means to achieve the purpose of the Resource Management Act 1991 (RMA) where it is necessary to revert to Part 2, and otherwise give effect to higher order planning documents.

Recommendations:

309. I recommend that:

- The Hearing Commissioners accept, accept in part, or reject submissions (and associated further submissions) as outlined in **Appendix B** of this report; and
- The PDP is amended in accordance with the changes recommended in **Appendix A** of this report.

Signed:

Name and Title		Signature
Andrew Willis Consultant Planner		

Appendix A - Recommended Amendments

Where I recommend changes in response to submissions, these are shown as follows:

- Text recommended to be added to the Proposed Plan is underlined.
- Text recommended to be deleted from the Proposed Plan is ~~struck through~~.

Please note: some clause number formatting has been changed in these provisions (under RMA Schedule 1, Clause 16(2)) to align with the National Planning Standard's numbering requirements. These number formatting changes are not shown in track changes.

STRATEGIC DIRECTION

Introduction

This section sets out the overarching directions for the sustainable management of growth, land use and development of the Timaru District. The section is arranged in two chapters: Strategic Directions and Urban Form and Development. The Strategic Directions:

- are strategically important for achieving integrated management and for ensuring the RMA's purpose is achieved;
- give effect to relevant higher order documents such as national policy statements and the Canterbury Regional Policy Statement; and
- provide a basis for how decisions relating to resource use will be made in the District over the life of the Plan.

Focusing as it does on high level strategic directions, this section leaves the articulation of activity-specific and location-specific objectives and policies to the subsequent chapters of this Plan.

These provisions have been informed by the Timaru District 2045 Growth Management Strategy which addresses growth and development in the district and sets out a spatial framework for its management. They support achieving a district that has a sustainable lifestyle, a thriving and innovative economy and a strong identity.

Interpretation

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 and the consideration of notices of requirement for designations)⁸:

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;

⁸ Transpower [159.25]

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 or between the strategic objectives and the objectives and policies in other chapters of the Plan.⁹

The Strategic Directions and Urban Form and Development Chapters include some terms that are not defined (for example 'unacceptable' in SD-O4(ii)). This is purposeful, as the interpretive guidance for these terms is provided by the topic specific chapters (for example the Natural Hazards Chapter).¹⁰

Objectives	
SD-O1	Residential Areas and Activities
<ol style="list-style-type: none"> 1. There is sufficient residential development capacity in existing and proposed urban areas to meet demand and household choice, provided through: <ol style="list-style-type: none"> a. the use of existing zoned greenfield areas; b. a range of densities in existing urban areas; and c. higher residential densities in close proximity to the Timaru and Geraldine town centres, and Highfield Village Mall; d. the new Future Development Areas identified for the General Residential Zone. 2. 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 significant reverse sensitivity effects on existing and permitted rural activities,</u>¹¹ <u>recognises the productive capabilities of the soils and location</u>¹² and are capable of efficiently connecting to reticulated sewer and water infrastructure; and 3. limited residential opportunities are maintained in existing rural settlements, subject to adequate servicing; <u>and</u> 4. <u>the location of new residential areas and activities avoids creating significant conflict with incompatible zones and activities.</u>¹³ 	

⁹ Transpower [159.25]

¹⁰ Te Rūnanga o Ngāi Tahu [185.19]

¹¹ Fonterra [165.25]

¹² Federated Farmers [182.28]

¹³ Silver Fern Farms [172.12] and Alliance Group [173.11]

SD-O2	The Natural and Historic Environment
<p>The District's natural and historic environment is managed so that:</p> <ol style="list-style-type: none"> 1. the health and wellbeing of the community are recognised as being linked to the natural environment; 2. an integrated management approach is adopted that recognises that all parts of the environment are interdependent; 3. the natural character of the coastal environment, wetlands and waterbodies is preserved and protected from inappropriate subdivision, use, and development; 4 important landscapes and features are protected from inappropriate subdivision, use, and development; 5. <u>indigenous biodiversity is maintained and enhanced and restored where necessary so that there is at least no overall loss;</u>¹⁴ 6. significant indigenous vegetation and significant habitats of indigenous fauna are identified and their values recognised, protected and where appropriate, enhanced, and where ecological integrity is degraded, restored;¹⁵ 6 7 the life-supporting capacity of ecosystems and resources is safeguarded for future generations; and 7 8 the important contribution of historic heritage to the District's character and identity is recognised, and significant historic <u>historic</u> heritage and its values are protected from inappropriate subdivision, use, and development..¹⁶ 	
SD-O3	Climate Change
<p>The effects of climate change are recognised and an integrated management approach is adopted, including through:</p> <ol style="list-style-type: none"> 1. taking climate change into account in natural hazards management; 2. enabling the community <u>and activities</u>¹⁷ to adapt to climate change; 3. encouraging efficiency in urban form and settlement patterns <u>and encouraging activities which reduce carbon emissions</u>¹⁸; and 4. <u>recognising the important role renewable electricity plays in achieving New Zealand's net carbon zero target by providing for renewable electricity generation, electricity transmission and electricity distribution.</u>¹⁹ 	
SD-O4	Natural Hazards
<p>Natural hazards risks are addressed so that:</p> <ol style="list-style-type: none"> 1. areas subject to natural hazards and risk are identified; 2. development is avoided in areas where the risks of natural hazards to people, property and infrastructure are assessed as being unacceptable; and 3. for other areas, natural hazards risks are appropriately mitigated. 	

¹⁴ Dir. General Conservation [166.18]¹⁵ Dir. General Conservation [166.18]¹⁶ Fonterra [165.26]¹⁷ Hort NZ [245.38]¹⁸ Port Blakely [94.2]¹⁹ Transpower [159.27]

SD-O5	Mana Whenua
<p>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:</p> <ol style="list-style-type: none"> 1. mahika kai resources and habitats of indigenous species are sustained and opportunities for their enhancement or restoration are encouraged; 2. the health of water body and wetland environments is protected from adverse effects of land use and development; 3. the values of identified sites and areas of significance to Kāti Huirapa are recognised and protected; 4. <u>where appropriate</u>, Kāti Huirapa retains, and where appropriate²⁰ is able to enhance access to their sites and areas of significance; 5. Māori reserve lands are able to be used by Kāti Huirapa for their intended purposes; 6. Kāti Huirapa are able to carry out customary activities in accordance with tikanga; and 7. Kāti Huirapa are actively involved in decision making that affects their values and interests in these matters and are able to exercise their kaitiakitaka responsibilities. 	
SD-O6	Business Areas and Activities
<p>Business and economic prosperity in the District is enabled in appropriate locations, including by:</p> <ol style="list-style-type: none"> 1. providing <u>at least</u>²¹ sufficient <u>and appropriately located</u> land for <u>to meet the operational requirements of a range of existing and new</u> business activities to cater for projected growth;²² and 2. providing opportunities for a range of business activities <u>and other compatible activities</u>²³ 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 industrial zones</u>.^{24 25 26} 	
D-O7	Centres
<p>The District's city and town centres:</p> <ol style="list-style-type: none"> 1. are maintained and enhanced as vibrant, attractive community focal points, providing a high level of amenity and opportunities for social interaction; 2. are the primary focus for retail, office and other commercial <u>and community activities</u>;²⁷ and 3. provide for the highest density of business, residential and visitor accommodation, and for intensification opportunities. 	

²⁰ OWL [181.22]²¹ White Water [248.2]²² Fonterra [165.30]²³ Dept. Corrections [239.7]²⁴ Synlait [163.2]²⁵ Fonterra [165.30]²⁶ Silver Fern Farms [172.15] and Alliance Group [173.13]²⁷ Dept. Corrections [239.8]

SD-O8	Infrastructure
<p>Across the District:</p> <ol style="list-style-type: none"> 1. improved accessibility and multimodal connectivity is provided through a safe and efficient transportation network that is able to adapt to technological changes; 2. 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>;²⁸ 3. drinking water supplies are protected from the adverse effects of subdivision, use and development; and 4. 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, <u>including reverse sensitivity effects</u>, appropriately.^{29 30} 	
SD-O9	Rural Areas
<p>A range of primarily productive activities are enabled in the rural environment to <u>enable prioritise</u>³¹ the ongoing use of land for primary production for present and future generations, while:</p> <ol style="list-style-type: none"> 1. protecting versatile soils <u>highly productive land</u>³² for productive uses; 2. managing the adverse effects of intensive <u>production</u>^{33 34} activities on <u>existing</u>³⁵ sensitive activities; 3. managing the adverse effects, <u>including reverse sensitivity effects</u>,^{36 37} of new sensitive activities on primary production; 4. avoiding activities that have no functional/operational need to locate in the rural area; 5. identifying and maintaining the character, qualities and amenity values of rural areas; and 6. ensuring Future Development Area overlay remains available for future urban or rural lifestyle development. 	
SD-O10	Community and Open Space
<p>A range of recreational, social and community facilities and open spaces that meet the long-term needs of the community are enabled, including:</p> <ol style="list-style-type: none"> 1. <u>where appropriate</u>,³⁸ the provision of public access to and along the coastal marine area and margins of identified rivers; and 2. the provision of a network of facilities and open spaces to support densification and new growth areas, including co-location. 	

²⁸ Fonterra [165.31]

²⁹ Enviro NZ [162.5]

³⁰ KiwiRail [187.16]

³¹ NZ Frost Fans [255.2]

³² Hort NZ [245.40]

³³ Helicopters Sth Cant., [53.12] and the NZAAA [132.12]

³⁴ Hort NZ [245.40]

³⁵ Silver Fern Farms [172.16] and Alliance Group [173.14]

³⁶ Helicopters Sth Cant., [53.12] and NZAAA [132.12]

³⁷ Ballance [86.4]

³⁸ PrimePort [175.16]

URBAN FORM AND DEVELOPMENT

Objective

UFD-O1 Settlement Patterns

A consolidated and integrated settlement pattern that:

1. efficiently accommodates future growth and capacity for commercial, industrial, community, educational³⁹ and residential activities, primarily within the urban areas of the Timaru township, future development areas⁴⁰ and the existing townships of Temuka, Geraldine, and Pleasant Point;
2. is integrated and coordinated with, and ensures the efficient use of infrastructure;⁴¹
3. ~~reduces~~ minimises⁴² ⁴³ adverse effects on the environment, including energy consumption, carbon emissions and water use;
4. protects drinking water supplies from the adverse effects of subdivision, use and development;
5. is well designed, of a good quality, ~~recognises existing character and amenity~~ provides housing and business choice, is consistent with the character and amenity anticipated by the plan⁴⁴ and is ~~attractive and functional to~~ for residents, business and visitors;
6. avoids significant adverse effects on⁴⁵ areas with important natural, cultural and character values;
7. minimises the loss of ~~versatile soils~~ highly productive land;⁴⁶ ⁴⁷
8. where appropriate, enables papakāika, to occur ~~on ancestral lands~~;⁴⁸
9. avoids locating new growth in areas where the impacts from natural hazards are unacceptable or which would require additional significant⁴⁹ hazard mitigation; ~~and~~
10. controls the location of activities, primarily by zoning, to ~~minimise~~ manage⁵⁰ conflicts between incompatible activities, including reverse sensitivity effects⁵¹ and avoid these where there may be significant adverse effects-;
11. improves accessibility and connectivity for people through services and transport, including walking and cycling routes;⁵²
12. avoids unanticipated urban development outside of the Future Development Area Overlay or out of sequence development, unless it provides significant development capacity and contributes to a well-functioning urban environment;⁵³ and
13. manages adverse effects of urban development on the stormwater network.⁵⁴

³⁹ MoE [106.7]

⁴⁰ White Water [248.3]

⁴¹ TDC [42.13]

⁴² Kāinga Ora [229.13]

⁴³ Forest and Bird [156.47]

⁴⁴ Waka Kotahi [143.19]

⁴⁵ Silver Fern Farms [172.17] and Alliance Group [173.15]

⁴⁶ ECan [183.20]

⁴⁷ Speirs, B [66.17] and Hort NZ [245.41]

⁴⁸ Te Tumu Paeroa, [240.5]

⁴⁹ Silver Fern Farms [172.17] and Alliance Group [173.15]

⁵⁰ Transpower [159.30]

⁵¹ Fonterra [165.33]

⁵² Te Rūnanga o Ngāi Tahu [185.23]

⁵³ ECan [183.19]

⁵⁴ Te Rūnanga o Ngāi Tahu [185.23]

Appendix B - Recommended responses to submissions and further submissions

Part 1 – Strategic Directions

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary	Accept / Reject
Royal Forest and Bird Protection Society	156.2	General	Climate Change		The submitter supports the provision of the Plan that manages effects of climate change including SD-O3 and the Natural Hazards and Risks chapter, however, considers that the PDP should be amended to provide more strength on climate change matters and statutes. [Refer to original submission for full reason].	1. Amend the PDP to have regard to Emissions Reduction Plan and National Adaptation Plan. AND 2. Amend PDP so areas that contain threatened and at-risk native species and indigenous biodiversity more broadly are considered, particularly within the in the Natural Hazards and Risks chapter and Strategic Directions (see related submission points on these chapters).	Reject
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.	Accept in part
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.	Accept in part
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> 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; 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>	Accept
Royal Forest and Bird Protection Society	156.35	SD - Strategic Direction	Introduction	General	Not specified.	Retain as notified.	Accept in part
Te Runanga o Ngai Tahu	185.15	SD - Strategic Direction	Introduction	General	The Introduction and Chapter as a whole seems to rely on the Growth Management Strategy for the District. This strategy indicates that mana whenua reviewed the document, however there is little provision for iwi growth and development within the document. We request that the Chapter does not solely rely on the Growth Strategy but also Iwi Management Plans and treaty obligations to partner with	Amend SD - Strategic Direction, Introduction as follows: <i>This section sets out the overarching directions for the sustainable management of growth, land use and development of the Timaru District.</i> [...] <i>These provisions have been informed by <u>iwi management plans and</u> the Timaru District 2045 Growth Management Strategy which addresses growth and development in the district and sets out a spatial framework for its management.</i>	Reject

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary	Accept / Reject
					iwi to allow for growth and development on mana whenua land.	<i>They support achieving a district that has a sustainable lifestyle, a thriving and innovative economy and a strong identity.</i>	
Te Runanga o Ngai Tahu	185.16	SD - Strategic Direction	Objectives	General	Notes the National Planning Standards require the Strategic Direction section outline the key strategic matters for the district and guide decision making at a strategic level. The objective for mana whenua is limited to the topic and are not integrated enough to provide guidance on how to address issues when the activity impacts more than one strategic objective. The isolation of mana whenua to one objective will impact its ability to be considered and the following submission points identify how mana whenua values can be considered throughout the plan.	Amend the SD-Strategic Directions to provide guidance for activities that impact more than one objective, particularly mana whenua values.	Accept in part
Timaru City Centre Ratepayers Action Group	219.2	SD - Strategic Direction	Objectives	General	Supports the CBD is recognised in the Strategic Directions as the main retail and mixed-use commercial centre for our district and this has been enshrined in the new Strategic Directions chapter of the Proposed District Plan. The approach of focusing future mixed use development intensification around existing city centres and transport hubs seems to align well with the recently adopted National Policy Statement on Urban Development (NPS-UD 2020). [Refer original submission for full reason]	None specified.	Accept
Timaru Civic Trust	223.3	SD - Strategic Direction	Objectives	General	Supports the CBD is recognised in the Strategic Directions as the main retail and mixed-use commercial centre for our district and this has been enshrined in the new Strategic Directions chapter of the Proposed District Plan. The approach of focusing future mixed use development intensification around existing city centres and transport hubs seems to align well with the recently adopted National Policy Statement on Urban Development (NPS-UD 2020). [Refer original submission for full reason]	None specified.	Accept
Andrew Scott Rabbidge, Holly Renee Singline and RSM Trust Limited	27.1	SD - Strategic Direction	Objectives	SD-O1 Residential Areas and Activities	Support clauses i & ii to enable growth within including reticulated sewer and water infrastructure.	Retain SD-O1 Residential Areas and Activities as the submitter believes this will enable growth within the FDAs to have Council provided sewer and water networks in Future Development Area to be extended by Council.	Accept in part
Ford, Pyke, Andrews Talbot, Wilkins & Proudfoot,	33.2	SD - Strategic Direction	Objectives	SD-O1 Residential Areas and Activities	Support the Objective provided that the necessary sewer and water infrastructure extensions be completed by the Timaru District Council.	Support SD-O1 Residential Areas and Activities on the basis that sewer and water infrastructure in Future Development Areas be extended by Council.	Accept in part

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary	Accept / Reject
Craig, Mackenzie							
Greenfield, McCutcheon, Tarrant, Sullivan and Ellery	34.1	SD - Strategic Direction	Objectives	SD-O1 Residential Areas and Activities	Support the Objective provided that the necessary sewer and water infrastructure extensions be completed by the Timaru District Council.	Support SD-O1 Residential Areas and Activities on the basis that sewer and water infrastructure in Future Development Areas to be extended by Council.	Accept in part
Milward Finlay Lobb	60.7	SD - Strategic Direction	Objectives	SD-O1 Residential Areas and Activities	Support clauses i & ii.	Retain SD-O1 clauses i & ii as proposed.	Accept in part
Royal Forest and Bird Protection Society	156.37	SD - Strategic Direction	Objectives	SD-O1 Residential Areas and Activities	Not specified.	Retain as notified.	Accept in part
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> [...]	Accept in part
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 [...] <i>iv. <u>The location of new residential areas and activities avoids creating conflict with incompatible zones and activities.</u></i>	Accept in part
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 [...] <i>iv. <u>The location of new residential areas and activities avoids creating conflict with incompatible zones and activities.</u></i>	Accept in part

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary	Accept / Reject
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: SD-O1 Residential Areas and Activities <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>	Reject
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.	Accept
Canterbury Regional Council (Environment Canterbury)	183.15	SD - Strategic Direction	Objectives	SD-O1 Residential Areas and Activities	Supports SD-O1 as it is consistent with CRPS Objective 5.2.1. Particularly support clauses ii & ii.	Retain SD-O1 as notified or preserve the original intent.	Accept in part
Te Runanga o Ngai Tahu	185.17	SD - Strategic Direction	Objectives	SD-O1 Residential Areas and Activities	The submitter notes that the objective states there is sufficient residential capacity in the existing and proposed urban areas. It limits development outside these urban areas. There is little integration between the objectives meaning that they will be hard to implement at a decision making level without clarification within the objective as to how it relates to other objectives within the section.	Amend SD-O1 Residential Areas and Activities to better reflect the functional need for some activities and growth to occur outside the urban area.	Reject
Spark New Zealand Trading Limited	208.31	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: SD-O1 Residential Areas and Activities <i>i. There is sufficient residential development capacity [...]</i> <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 and are capable of efficiently connecting to reticulated sewer and water infrastructure; and [...]</i>	Reject
Chorus New Zealand Limited	209.31	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	Amend SD-O1 as follows: SD-O1 Residential Areas and Activities	Reject

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary	Accept / Reject
					development. Such a change would also provide for better alignment between SD- O1 and SD-O8.	<p><i>i. There is sufficient residential development capacity [...]</i></p> <p><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 and are capable of efficiently connecting to reticulated sewer and water infrastructure; and</i></p> <p><i>[...]</i></p>	
Vodafone New Zealand Limited	210.31	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.	<p>Amend SD-O1 as follows:</p> <p>SD-O1 Residential Areas and Activities</p> <p><i>i. There is sufficient residential development capacity [...]</i></p> <p><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 and are capable of efficiently connecting to reticulated sewer and water infrastructure; and</i></p> <p><i>[...]</i></p>	Reject
Kāinga Ora	229.7	SD - Strategic Direction	Objectives	SD-O1 Residential Areas and Activities	None specified.	Retain SD-O1 as notified.	Accept in part
Ara Poutama Aotearoa, The Department of Corrections	239.6	SD - Strategic Direction	Objectives	SD-O1 Residential Areas and Activities	<p>Considers the objective should ensure a wide range of housing types are provided in residential areas to support the diverse housing needs of the community now and into the future including supported accommodation activities.</p> <p>[see original submission for full reason]</p>	<p>Amend SD-O1 as follows:</p> <p>SD-O1 Strategic Direction</p> <p><i>i. There is sufficient residential development capacity in existing and proposed urban areas to meet demand and household choice, provided through:</i></p> <p><i>a. the use of existing zoned greenfield areas;</i></p> <p><i>b. a range of densities in existing urban areas; and</i></p> <p><i>c. higher residential densities in close proximity to the Timaru and Geraldine town centres, and Highfield Village Mall;</i></p> <p><i>d. the new Future Development Areas identified for the General Residential Zone.;</i></p> <p><i><u>e. a wide range of housing types and sizes.</u></i></p> <p><i>[...]</i></p>	Reject
Horticulture New Zealand	245.37	SD - Strategic Direction	Objectives	SD-O1 Residential Areas and Activities	Supports the strategic direction approach to residential areas and activities that is centres based and limits rural lifestyle development.	Retain as notified.	Accept in part

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary	Accept / Reject
Royal Forest and Bird Protection Society	156.46	SD - Strategic Direction	Objectives	SD-O10 Community and Open Space	Not specified.	Not specified.	Accept in part
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> 	Accept in part
Heritage New Zealand Pouhere Taonga	114.9	SD - Strategic Direction	Objectives	SD-O2 The Natural and Historic Environment	Supports SD-02 which recognises the contribution of historic heritage and seeks to protect it from inappropriate subdivision, use and development.	Retain as notified.	Accept in part
New Zealand Agricultural Aviation Association	132.11	SD - Strategic Direction	Objectives	SD-O2 The Natural and Historic Environment	Supports strategies that recognise, protect and enhance indigenous vegetation and native flora and fauna.	Retain as notified.	Accept in part
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: <ol style="list-style-type: none"> 1. creating a separate objective for the Historic Environment; and 2. that the contribution that Historic Heritage makes to the District. 	Reject
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.	Accept in part
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 significant-historic heritage and its values are protected from inappropriate subdivision, use, and development.</i>	Accept in part

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary	Accept / Reject
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> <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>x. there is an overall net gain in the quality and quantity of indigenous ecosystems and habitat, and indigenous biodiversity;</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, and, where the ecological integrity is degraded, restored;</i></p> <p><i>y. indigenous biodiversity is maintained and enhanced; with all indigenous biodiversity having improved connectivity and improved resilience.</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>	Accept in part
Silver Fern Farms	172.13	SD - Strategic Direction	Objectives	SD-O2 The Natural and Historic Environment	<p>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.</p>	<p>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.</p>	Reject
Federated Farmers	182.29	SD - Strategic Direction	Objectives	SD-O2 The Natural and Historic Environment	<p>Supports this objective.</p>	<p>Retain as notified.</p>	Accept in part
Canterbury Regional Council (Environment Canterbury)	183.16	SD - Strategic Direction	Objectives	SD-O2 The Natural and Historic Environment	<p>Considers the objective is consistent with CRPS objectives 8.2.4, 9.2.3, 12.2.,2, and 13.2.1, however it is inconsistent with CRPS Policy 12.2.1 as it only refers to important landscapes and not outstanding natural features and landscapes.</p>	<p>Amend SD-O2 to include reference to the identification and protection of outstanding natural features and landscapes.</p>	Reject
Te Runanga o Ngai Tahu	185.18	SD - Strategic Direction	Objectives	SD-O2 The Natural and Historic Environment	<p>The submitter notes that the definition of historic heritage includes sites of significance to Māori, however mana whenua consideration is not present in this objective. Section 6 of the RMA states that Council as part of its role in implementing the Act shall recognise and provide for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, Wāhi tapu, and other taonga. In order to give effect to this, it is requested that the objective is amended to include reference to this relationship as to better provide guidance in how to achieve this objective.</p>	<p>Amend SD-O2 The Natural and Historic Environment to better reflect the relationship of Kāti Huirapa and their culture and traditions with their ancestral lands, water, sites, Wāhi tapu, and other taonga.</p>	Reject

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary	Accept / Reject
Port Blakely Limited	94.2	SD - Strategic Direction	Objectives	SD-O3 Climate Change	Considers there should be recognition of certain land uses which help mitigate the effects of climate change, especially activities which sequester carbon.	Amend SD-O3 Climate Change by inserting wording to the effect of encouraging land use practices, such as plantation forestry which mitigate the effects of climate change, especially activities which sequester carbon.	Accept in part
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.	Reject
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>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.</i>	Accept
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.	Accept in part
Canterbury Regional Council (Environment Canterbury)	183.17	SD - Strategic Direction	Objectives	SD-O3 Climate Change	Supports the specific consideration of climate change and an integrated management approach and note it is consistent with CRPS Objective 11.2.3.	Retain SD-O3 as notified or preserve the original intent.	Accept in part
BP Oil, Mobil Oil New Zealand Limited, Z Energy	196.16	SD - Strategic Direction	Objectives	SD-O3 Climate Change	Supports SD-O3 Climate Change which seeks that the effects of climate change are recognised and an integrated management approach is adopted. The broad overall direction is supported as it sets the scene for the management of climate change effects and the management of natural hazards, adaptation and efficient urban form throughout the PDP.	Retain Objective SD-O2 as notified.	Accept in part
Kāinga Ora	229.8	SD - Strategic Direction	Objectives	SD-O3 Climate Change	None specified.	Retain SD-O3 as notified.	Accept in part
Horticulture New Zealand	245.38	SD - Strategic Direction	Objectives	SD-O3 Climate Change	Supports an objective that seeks to enable adaption to climate change while noting this should reference to community and activities.	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>	Accept

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary	Accept / Reject
						<p>taking climate change into account in natural hazards management;</p> <p>enabling the community <u>and activities</u> to adapt to climate change;</p> <p>encouraging efficiency in urban form and settlement patterns.</p>	
Lineage Logistics NZ Limited	107.6	SD - Strategic Direction	Objectives	SD-O4 Natural Hazards	<p>Considers that the Council's approach of applying a sea level rise of 1.2m on the basis of NZRCP8.5M is inappropriate and does not reflect the recommendations of the IPCC Sixth Assessment Report.</p> <p>Considers that the requirement or goal in SD-04 (ii) that development: " is avoided in areas where the risks of natural hazards to people, property and infrastructure are assessed as being unacceptable" is problematic for a range of reasons:</p> <ul style="list-style-type: none"> the s32 assessment is unclear in terms of 'unacceptable risk'; a blanket avoidance approach impose significant costs which would outweigh the benefits, this is not addressed in the s32 assessment; the approach is inconsistent with Part II of the RMA. <p>[Refer original submission for full reason]</p>	<p>1. Areas subject to sea level rise are identified on the basis of NZ RCP 4.5 Median projections as opposed to NZ RCP 8.5M.</p> <p>2. Remove SD-04.ii; or</p> <p>3. Replace SD-04.ii with wording that accurately reflects a risk-based approach. The following worded is suggested as an example only: <i>Managing development to ensure the risks of natural hazards to people, property and infrastructure are acceptable.</i></p> <p>4. Such other alternative or additional relief as may be appropriate to give effect to the intent of the submission including, but not limited to, corresponding objectives, policies and rules that implement SD-04.</p>	5. Reject
Royal Forest and Bird Protection Society	156.40	SD - Strategic Direction	Objectives	SD-O4 Natural Hazards	<p>Considers the objective should ensure that natural hazard risks to native species and habitat are identified and appropriately mitigated.</p>	<p>Amend SD-O4 Natural Hazards to ensure that risks of natural hazards to native species and habitat, are avoided or appropriately mitigated by either:</p> <ol style="list-style-type: none"> amend clause (ii); OR add another clause. 	Reject
Transpower New Zealand Limited	159.28	SD - Strategic Direction	Objectives	SD-O4 Natural Hazards	<p>Supports the objective but considers it should better reflect section 6(h) of the RMA.</p>	<p>Amend Objective SD-04 Natural Hazards as follows: <i>Significant nNatural hazards risks are addressed so that: [...]</i></p>	Reject
Fonterra Limited	165.28	SD - Strategic Direction	Objectives	SD-O4 Natural Hazards	<p>Agrees that the effects of natural hazards need to be recognised and managed.</p>	<p>Retain as notified.</p>	Accept
Silver Fern Farms	172.14	SD - Strategic Direction	Objectives	SD-O4 Natural Hazards	<p>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.</p>	<p>Amend SD-04 as follows: SD-04 Natural Hazards [...] <i>iii. for other areas, natural hazards risks are appropriately mitigated <u>if necessary to enable a land use, development or subdivision.</u></i></p>	Reject

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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 [...] <i>iii. for other areas, natural hazards risks are appropriately mitigated <u>if necessary to enable a land use, development or subdivision.</u></i>	Reject
Te Runanga o Ngai Tahu	185.19	SD - Strategic Direction	Objectives	SD-O4 Natural Hazards	Much of the district and the Māori Land is subject to Natural Hazards. The objective states 'avoid' development in these areas where the risk is 'unacceptable'. The term 'unacceptable' seems to be subjective and could see mana whenua unable to recognise their rakatirataka on their own land. There is little integration between the objectives meaning that they will be hard to implement at a decision making level without clarification within the objective as to how it relates to other objectives within the section.	Amend SD-O4 Natural Hazards to better reflect the relationship of Kāti Huirapa and their culture and traditions with their ancestral lands, water, sites, Wāhi tapu, and other taonga.	Accept in part
BP Oil, Mobil Oil New Zealand Limited, Z Energy	196.17	SD - Strategic Direction	Objectives	SD-O4 Natural Hazards	Supports the principle of Objective SD-O4 (Natural Hazards) in that it recognises that if risks to people, property and infrastructure are unacceptable, development should be avoided, and otherwise, risks should be appropriately managed. The PDP introduces a definition of unacceptable risk which relates solely to MHF and where exposure of sensitive activities to an individual fatality risk level exceeds 1 in a million. This does not relate to natural hazards. As such, use of the terms 'unacceptable' and 'risk' in clause ii of this strategic- level policy that relates to natural hazards is potentially confusing to the Plan user and amendments are suggested accordingly.	Amend SD-O4 Natural Hazards as follows: Natural hazards risks are addressed so that: <i>i. areas subject to natural hazards and risk are identified;</i> <i>ii. development is avoided in areas where the risks of natural hazards to people, property and infrastructure are assessed as being unacceptable; <u>and development does not increase risks of social, environmental and economic harm;</u> and</i> <i>iii. for other areas, natural hazards risks are appropriately mitigated.</i>	Reject
Kāinga Ora	229.9	SD - Strategic Direction	Objectives	SD-O4 Natural Hazards	Supports this objective in principle, but has some concerns around what is 'unacceptable'. The submitter views that SD-O4 should be amended to more explicitly refer to unacceptable risk being risks to life and human safety.	Amend SD-O4 as follows: SD-O4 Natural Hazards <i>Natural hazards risks are addressed so that:</i> <i>i. areas subject to natural hazards and risk are identified;</i> <i>ii. development is avoided in areas where the risks of natural hazards to people, property and infrastructure are assessed as being unacceptable <u>to human health and safety;</u> and</i> <i>iii. for other areas, natural hazards risks are appropriately mitigated.</i>	Reject
Royal Forest and Bird Protection Society	156.41	SD - Strategic Direction	Objectives	SD-O5 Mana Whenua	Not specified.	Not specified.	Accept in part

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Fonterra Limited	165.29	SD - Strategic Direction	Objectives	SD-05 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-05 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>	Reject
Penny Nelson, Director-General of Conservation Tumuaki Ahurei	166.19	SD - Strategic Direction	Objectives	SD-05 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.	Accept in part
Opuha Water Limited	181.22	SD - Strategic Direction	Objectives	SD-05 Mana Whenua	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. 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.	Amend SD-05 Mana Whenua as follows: <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> [...] <i>iv. <u>Where appropriate</u>, Kāti Huirapa retains, and where appropriate is able to enhance access to their sites and areas of significance; ...</i> <i>vi. <u>Where appropriate</u>, Kāti Huirapa are able to carry out customary activities in accordance with tikanga; ...</i>	Accept in part
Federated Farmers	182.30	SD - Strategic Direction	Objectives	SD-05 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 recognise 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-05 Mana Whenua The mana whenua status as follows: [...] <i>iii. 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.</i> AND Any consequential amendments required as a result of the relief sought.	Reject
Te Runanga o Ngai Tahu	185.20	SD - Strategic Direction	Objectives	SD-05 Mana Whenua	Considers amendments are necessary to include all cultural resources and all types of Kāti Huirapa land to better achieve these outcomes. Also request that reference to growth and development of our people is acknowledged here as a desired outcome.	Amend SD-05 Mana Whenua to better reflect the relationship of Kāti Huirapa and their culture and traditions with their ancestral lands, water, sites, Wāhi tapu, and other taonga as well as their aspirations.	Reject
Te Tumu Paeroa, Office	240.4	SD - Strategic Direction	Objectives	SD-05 Mana Whenua	Submitter generally supports the objectives in the 'Strategic Direction' chapter. However, considers that an amendment	Amend SD-05 as follows:	Reject

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of the Maori Trustee					to SD-O5(iv) is required to ensure all Māori landowners are included.	<p>SD-O5 Mana Whenua</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> <ul style="list-style-type: none"> <i>i. mahika kai resources and habitats of indigenous species are sustained and opportunities for their enhancement or restoration are encouraged;</i> <i>ii. the health of water body and wetland environments is protected from adverse effects of land use and development;</i> <i>iii. the values of identified sites and areas of significance to Kāti Huirapa are recognised and protected;</i> <i>iv. Kāti Huirapa <u>and Māori landowners</u> retains, and where appropriate <u>is are</u> able to enhance access to their sites and areas of significance;</i> <p>[...]</p>	
Southern Proteins Limited	140.5	SD - Strategic Direction	Objectives	SD-O6 Business Areas and Activities	Considers the reference to providing opportunities for a range of business activities to establish and prosper is appropriate.	Retain as notified.	Accept in part
Royal Forest and Bird Protection Society	156.42	SD - Strategic Direction	Objectives	SD-O6 Business Areas and Activities	Not specified.	Not specified.	Accept in part
Synlait Milk Limited	163.2	SD - Strategic Direction	Objectives	SD-O6 Business Areas and Activities	<p>Supports the intent of SD-O6 but considers that it also needs to protect industrial zoned land from reverse sensitivity effects</p> <p>i.e. the purpose and function of industrial areas need to be strategically recognised as important to enabling those business activities.</p> <p>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]</p>	<p>Amend SD-O6 as follows: <i>Business and economic prosperity in the District is enabled in appropriate locations, including by:</i></p> <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> <p>OR wording to similar effect.</p>	Accept in part

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Fonterra Limited	165.30	SD - Strategic Direction	Objectives	SD-06 Business Areas and Activities	Considers that the wording of this provision should be amended to provide for existing and new businesses.	Amend SD-06 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 to meet the operational requirements of a range of <u>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.; and</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>	Accept in part
Hilton Haulage Limited Partnership	168.1	SD - Strategic Direction	Objectives	SD-06 Business Areas and Activities	Considers that SD-06 is appropriate.	Retain as notified.	Accept in part
Silver Fern Farms	172.15	SD - Strategic Direction	Objectives	SD-06 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-06 as follows: SD-06 Business areas and Activities <i>Business and economic prosperity in the District is enabled in appropriate locations, including by:</i> <i>i. providing sufficient land for a range of business <u>and industrial</u> 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 <u>or the viability of industrial zones.</u></i> <i>iii. <u>Avoiding the encroachment of incompatible activities that are sensitive to the effects of commercial and industrial activities.</u></i>	Accept in part
Alliance Group Limited	173.13	SD - Strategic Direction	Objectives	SD-06 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-06 as follows: SD-06 Business Areas and Activities <i>i. providing sufficient land for a range of business <u>and industrial</u> 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 <u>or the viability of industrial zones.</u></i> <i>iii. <u>Avoiding the encroachment of incompatible activities that are sensitive to the effects of commercial and industrial activities.</u></i>	Accept in part
Barkers Fruit Processors Limited	179.6	SD - Strategic Direction	Objectives	SD-06 Business Areas and Activities	Objective SD-06 is considered appropriate.	Retain as notified.	Accept in part
North Meadows 2021 Limited and	190.5	SD - Strategic Direction	Objectives	SD-06 Business Areas and Activities	Support SD-06, it is considered appropriate.	Retain SD-06 Business Areas and Activities as notified.	Accept in part

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Thompson Engineering (2002) Limited							
Kāinga Ora	229.10	SD - Strategic Direction	Objectives	SD-O6 Business Areas and Activities	Supports this objective as it provides for business land supply, consistent with Policy 2 of the NPSUD.	Retain SD-O6 as notified.	Accept in part
Ara Poutama Aotearoa, The Department of Corrections	239.7	SD - Strategic Direction	Objectives	SD-O6 Business Areas and Activities	Considers the objective should ensure other compatible activities such as community corrections activities are provided for.	Amend SD-O6 as follows: SD-O6 Strategic Direction <i>Business and economic prosperity in the District is enabled in appropriate locations, including by:</i> <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 <u>and other compatible activities</u> 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>	Accept
Woolworths New Zealand Limited	242.9	SD - Strategic Direction	Objectives	SD-O6 Business Areas and Activities	Supports the inclusion of this Objective as drafted as it is reflective of the intention of a “centres plus” approach to enabling some commercial activity to establish outside of the Centre zones.	Retain as notified.	Accept in part
White Water Properties LTD	248.2	SD - Strategic Direction	Objectives	SD-O6 Business Areas and Activities	Submitter considers it appropriate to have business and economic property identified as a strategic objective. White Water suggests part i of this Objective can be improved by the addition of the words "at least" prior to the words sufficient land. This amendment is considered more appropriate and, amongst others, to better reflect the National Policy Statement on Urban Development - NPS UD.	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 <u>at least</u> sufficient land for a range of business activities to cater for projected growth;</i> [...]	Accept
Royal Forest and Bird Protection Society	156.43	SD - Strategic Direction	Objectives	SD-O7 Centres	Not specified.	Not specified.	Accept in part
Te Runanga o Ngai Tahu	185.21	SD - Strategic Direction	Objectives	SD-O7 Centres	Considers that there is little integration between the objectives meaning that they will be hard to implement at a decision-making level without clarification within the objective as to how it relates to other objectives within the section.	Amend SD-O7 Centres to better reflect the relationship of Kāti Huirapa and their culture and traditions with their ancestral lands, water, sites, Wāhi tapu, and other taonga.	Reject
Harvey Norman Properties (N.Z.) Limited	192.11	SD - Strategic Direction	Objectives	SD-O7 Centres	The submitter generally supports this objective and the recognition that out-of-town-centre development can reduce the viability of the centre. In the case of Timaru, an	Amend SD-O7 Centres to reflect the commercial ‘Large Format Retail’ zone and its ability to function as a complementary hub for retail and commercial activity within the Timaru urban area.	Reject

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					Environment Court Consent Order established that Large Format Retail activities (subject to certain conditions) will enable the people and communities of the District to provide for their social, economic and cultural wellbeing in a way and at a rate that complements the Timaru CBD. Therefore, the commercial LFRZ "hub" at Showgrounds Hill needs to be suitably recognised in the PDP.		
Kāinga Ora	229.11	SD - Strategic Direction	Objectives	SD-07 Centres	Supports this objective as it provides appropriate high level direction for how centres are to be managed in the district.	Retain SD-07 as notified.	Accept in part
Ara Poutama Aotearoa, The Department of Corrections	239.8	SD - Strategic Direction	Objectives	SD-07 Centres	Considers the objective should ensure that community activities such as community corrections activities are provided in the District's city and town centres for to meet the needs of the community. [see original submission for full reason]	Amend SD-07 as follows: SD-07 Centres <i>The District's city and town centres:</i> <i>i. are maintained and enhanced as vibrant, attractive community focal points, providing a high level of amenity and opportunities for social interaction;</i> <i>ii. are the primary focus for retail, office and other commercial <u>and community</u> activities;</i> <i>iii. provide for the highest density of business, residential and visitor accommodation, and for intensification opportunities.</i>	Accept
Waka Kotahi NZ Transport Agency	143.18	SD - Strategic Direction	Objectives	SD-08 Infrastructure	Supports the proposed objective as it appropriately recognises the importance of infrastructure in the district, including the continued operation, maintenance and upgrading of said infrastructure.	Retain as notified.	Accept in part
Radio New Zealand Limited	152.25	SD - Strategic Direction	Objectives	SD-08 Infrastructure	Supports SD-08, particularly (iv). Considers it is important that Lifeline Utilities, which includes the submitter's facilities, are recognised and provided for.	Retain as notified.	Accept in part
Royal Forest and Bird Protection Society	156.44	SD - Strategic Direction	Objectives	SD-08 Infrastructure	Considers that emissions reduction should be incorporated in the objective.	Amend SD-08 Infrastructure as follows: <i>Across the District:</i> <i>i. improved accessibility, <u>reduced emissions</u> and multimodal connectivity is provided through a safe and efficient transportation network that is able to adapt to technological changes;</i> <i>[...]</i>	Reject
Transpower New Zealand Limited	159.29	SD - Strategic Direction	Objectives	SD-08 Infrastructure	Supports the objective as it gives effect to the Objective and Policies 1 and 2 of the NPSET.	Retain as notified.	Accept in part

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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>	Accept in part
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> [...]	Accept
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>	Reject
Fulton Hogan Limited	170.9	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 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>	Reject
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.	Accept in part
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.	Accept in part
Canterbury Regional Council (Environment Canterbury)	183.18	SD - Strategic Direction	Objectives	SD-O8 Infrastructure	Supports SD-O8 as it is consistent with CRPS Policy 5.2.2.	Retain SD-O8 as notified or preserve the original intent.	Accept in part

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KiwiRail Holdings Limited	187.16	SD - Strategic Direction	Objectives	SD-08 Infrastructure	Seeks an amendment to provide for the protection of regionally significant infrastructure from reverse sensitivity effects. The rail network can be vulnerable to adverse effects when incompatible subdivision, land use and development is located adjacent to an established rail line.	Amend SD-08 Infrastructure as follows: <i>Across the District:</i> <i>i. [...].</i> <i>v. <u>avoid, remedy or mitigate adverse effects, including reverse sensitivity effects, of subdivision, land use and development on regionally significant infrastructure.</u></i>	Accept in part
BP Oil, Mobil Oil New Zealand Limited, Z Energy	196.18	SD - Strategic Direction	Objectives	SD-08 Infrastructure	Supports the recognition of the benefits of RSI and their safe, efficient, and effective operation, maintenance, renewal and upgrading while managing adverse effects appropriately.	Retain SD-08 iv as notified.	Accept in part
Spark New Zealand Trading Limited	208.32	SD - Strategic Direction	Objectives	SD-08 Infrastructure	Supports that SD-08 clearly seeks that the benefits of regionally significant infrastructure and lifeline utilities are provided for across the district.	Retain as notified.	Accept in part
Chorus New Zealand Limited	209.32	SD - Strategic Direction	Objectives	SD-08 Infrastructure	Supports that SD-08 clearly seeks that the benefits of regionally significant infrastructure and lifeline utilities are provided for across the district.	Retain as notified.	Accept in part
Vodafone New Zealand Limited	210.32	SD - Strategic Direction	Objectives	SD-08 Infrastructure	Supports that SD-08 clearly seeks that the benefits of regionally significant infrastructure and lifeline utilities are provided for across the district.	Retain as notified.	Accept in part
Kāinga Ora	229.12	SD - Strategic Direction	Objectives	SD-08 Infrastructure	Supports this objective as it provides for transport choice and flexibility, as well as seeking coordination and integration of new infrastructure.	Retain SD-08 as notified.	Accept in part
Horticulture New Zealand	245.39	SD - Strategic Direction	Objectives	SD-08 Infrastructure	Supports the strategic direction for infrastructure, in particular clause iv).	Retain as notified.	Accept in part
Andrew Scott Rabbidge, Holly Renee Singline and RSM Trust Limited	27.12	SD - Strategic Direction	Objectives	SD-09 Rural Areas	Concerns that SD-09 vi which requires the Future Development Area overlay remains available for future urban or rural lifestyle development impose a number of significant restrictions on land use and land activities until rezoning occurs.	Add to SD-09 Rural Areas that FDA9 will have a 2-year priority.	Reject
Helicopters South Canterbury 2015 Ltd	53.12	SD - Strategic Direction	Objectives	SD-09 Rural Areas	Supports the enabling of primary production, protection of versatile soils and the management of reverse sensitivities. However, it is unclear what the undefined term 'intensive activities' is but the focus should be that sensitive activities don't affect primary production. [Refer original submission for full reason].	Amend SD-09 Rural Areas as follows: <i>A range of <u>primarily primary</u> 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. <u>protecting versatile soils for productive uses;</u></i> <i>ii. <u>managing the adverse effects of intensive activities on sensitive activities;</u></i> <i>iii. <u>managing the adverse effects of new sensitive activities on primary production; ensuring that sensitive activities do not adversely affect primary production, including reverse sensitivity effects;</u></i>	Accept in part

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary	Accept / Reject
						[...]	
Ballance Agri-Nutrients Limited	86.4	SD - Strategic Direction	Objectives	SD-09 Rural Areas	Supports enabling primary production activities in the rural environment. The clause refers to "primarily productive activities" which is not the same as primary production activities and therefore seek revision of this. In clause ii, 'intensive activities' are referred to but not defined which introduces confusion as to the intent of this clause. To avoid confusion this clause either needs to be removed or revised to provide clarification. Clause iii, needs to include reverse sensitivity as a potential effect.	Amend SD-09 Rural Areas as follows: <i>A range of primarily <u>productive</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. <u>managing the adverse effects, including reverse sensitivity effects, of new sensitive activities on primary production;</u></i> [...]	Accept in part
Dairy Holdings Limited	89.5	SD - Strategic Direction	Objectives	SD-09 Rural Areas	Supports recognition of the importance of rural areas in a strategic objective as it is a significant resource management matter for the district, but considers the provisos are not necessary for a strategic direction, which should be suitably high-level.	Amend SD-09 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, <u>while:</u></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;</i> <i>iv. avoiding activities that have no functional/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 overlay remains available for future urban or rural lifestyle development.</i>	Reject
New Zealand Agricultural Aviation Association	132.12	SD - Strategic Direction	Objectives	SD-09 Rural Areas	Supports strategies that enable primary production, protect versatile soils, and manage reverse sensitivities. However, clause ii) refers to 'intensive activities' which isn't defined so it is unclear what it refers to. The focus should be on ensuring that sensitive activities don't affect primary production. Clause iii) seeks to manage 'new sensitive activities'. The plan should ensure that sensitive activities do not adversely affect primary production, including reverse sensitivity effects.	Amend SD-09 as follows: SD-09 Rural Areas <i>A range of primarily <u>primary</u> 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) protecting versatile soils for productive uses;</i> <i>ii) managing the adverse effects of intensive activities on sensitive activities;</i> <i>iii) <u>managing the adverse effects of new sensitive activities ensuring that sensitive activities do not adversely affect primary production, including reverse sensitivity effects;</u></i> [...]	Accept in part

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary	Accept / Reject
Radio New Zealand Limited	152.26	SD - Strategic Direction	Objectives	SD-09 Rural Areas	Supports SD-09, particularly the direction to avoid activities that have no functional/ operational need to locate in the rural area. However, an amendment is sought to avoid adverse effects of sensitives activities on regionally significant infrastructure and lifeline utilities to recognise that the rural zone is a working area that generates noise, odours and other effects.	Amend SD-09 as follows: SD-09 Rural Areas <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> [...] iii. managing Avoiding the adverse effects of new sensitive activities on primary production, and Regionally Significant Infrastructure and Lifeline Utilities; [...]	Reject
Royal Forest and Bird Protection Society	156.45	SD - Strategic Direction	Objectives	SD-09 Rural Areas	Considers the objective should integrate the protection and maintenance of indigenous biodiversity into the rural area.	Amend SD-09 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. [...] vii. Protecting and maintaining indigenous biodiversity in rural areas	Reject
Fonterra Limited	165.32	SD - Strategic Direction	Objectives	SD-09 Rural Areas	Considers that the wording of this strategic direction should be amended to better protect rural areas for their intended purposes.	Amend SD-09 Rural Areas the strategic direction as follows: A range of primarily productive Primary production 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 sensitive activities; iii. managing the adverse effects of new sensitive activities on primary production and rural industry; iv. avoiding activities that have no functional/ or operational need to locate in the rural area; v. identifying and maintaining the character, qualities and amenity values of rural areas; vi. ensuring Future Development Area provide for rural activities until rezoned for residential purposes. Overlay remains available for future urban or rural lifestyle development.	Reject
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.	Accept in part
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.	Accept in part

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary	Accept / Reject
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. [...]	Accept in part
Alliance Group Limited	173.14	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. ensuring Future Development Area overlay remains available for future urban or rural lifestyle development.	Accept in part
Rural Contractors New Zealand	178.3	SD - Strategic Direction	Objectives	SD-09 Rural Areas	Considers that Objective SD-09 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-09 Rural Areas as follows: 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: [...] iii. managing the adverse effects of new sensitive activities on primary production <u>activities, rural industry and other supporting activities</u> ; [...]	Reject

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary	Accept / Reject
Federated Farmers	182.31	SD - Strategic Direction	Objectives	SD-09 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-09 Rural Areas as follows: [...] <i>vii Primary production activities are supported by Council to adapt to change required by regulatory and consumer demands</i> OR Wording with a similar intent; AND Any consequential amendments required as a result of the relief sought.	Reject
Te Runanga o Ngai Tahu	185.22	SD - Strategic Direction	Objectives	SD-09 Rural Areas	Considers that there is little integration between the objectives meaning that they will be hard to implement at a decision-making level without clarification within the objective as to how it relates to other objectives within the section.	Amend SD-09 Rural Areas to better reflect the relationship of Kāti Huirapa and their culture and traditions with their ancestral lands, water, sites, Wāhi tapu, and other taonga.	Reject
Horticulture New Zealand	245.40	SD - Strategic Direction	Objectives	SD-09 Rural Areas	Supports the scope of SD-09 and the outcomes it seeks to achieve. But seeks deletion of (ii) as intensive activities are not defined in the Plan.	Amend SD-09 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. protecting versatile soils highly productive land 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;</i> <i>iv. [...]</i>	Accept in part
New Zealand Pork Industry Board	247.9	SD - Strategic Direction	Objectives	SD-09 Rural Areas	Supports the separate Strategic Objective for Rural areas and the clarity this provides.	Retain as notified.	Accept in part
NZ Frost Fans Limited	255.2	SD - Strategic Direction	Objectives	SD-09 Rural Areas	Considers that while the objective generally protects highly productive land and associated appropriate land uses well, it needs to better reflect the NPS HPL and doesn't recognise the priority that is required to be given to land based primary production on highly productive land.	That the Objectives, Policies and Methods of the PDP be amended and/or included to give effect to the NPS-HPL. AND Amend SD-09 Rural Areas as follows: <i>A range of primarily predominantly productive activities are enabled in the rural environment to enable that prioritise 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 avoiding the adverse effects of new sensitive activities on primary production;</i> <i>iv. avoiding activities that have no functional/operational need to locate in</i>	Accept in part

Submitter	Sub No.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary	Accept / Reject
						<i>the rural area;</i> v. <i>identifying and maintaining the character, qualities and amenity values of rural areas;</i> vi. <i>ensuring Future Development Area overlay remains available for future urban or rural lifestyle development.</i>	
Canterbury Regional Council (Environment Canterbury)	183.17A	SD – Strategic Direction	Objectives	SD-O4 Natural Hazards	This objective is consistent with CRPS Objective 11.3.2 and Policies 11.3.8 & 11.3.9(1) and gives effect to the CCRPS natural hazards management hierarchy.	Retain SD-O4 as notified or preserve the original intent.	Accept

Part 2 - Urban Form and Development

Submitter	SubNo.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary	Accept / Reject
Timaru District Council	42.13	UFD - Urban Form and Development	Objectives	UFD-O1 Settlement Patterns	Support the objective, particularly clause (iv) which is consistent with the directives of Objective SD-O8. However, it considers a minor amendment to clause (ii) of UFD-O2 is warranted as the notified version of the clause appears to be incomplete. Inclusion of the word "co-ordinated" with respect to infrastructure is also considered appropriate to ensure consistency of terminology across the PDP (as noted in earlier submission points).	Amend UFD-O1 as follows: <i>A consolidated and integrated settlement pattern that:</i> [...] <i>ii. is integrated and co-ordinated with, and ensures the efficient use of, infrastructure;</i> [...]	Accept
Bruce Speirs	66.17	UFD - Urban Form and Development	Objectives	UFD-O1 Settlement Patterns	Consider the objective should be consistent with the National Policy Statement for Highly Productive Soils.	Amend UFD-O1 Settlement Patterns as follows: <i>A consolidated and integrated settlement pattern that:</i> [...] <i>vii. minimises the loss of versatile highly productive soils;</i> [...]	Accept
Ministry of Education	106.7	UFD - Urban Form and Development	Urban form and development	UFD-O1 Settlement Patterns	Consider explicit provision is given to educational facilities throughout the District in urban development to manage the impacts of development on educational facilities, in particular impacts on school capacity. Council has an obligation under the National Policy Statement for Urban Development (NPS- UD) to ensure sufficient additional infrastructure (which includes schools) is provided in urban growth and development (see Policy 10 and 3.5 of Subpart 1 of Part 3: Implementation, in particular).	Amend UFD-O1 Settlement Patterns as follows: UFD-O1 Settlement Patterns <i>A consolidated and integrated settlement pattern that:</i> <i>i. efficiently accommodates future growth and capacity for commercial, industrial, community, educational and residential activities, primarily within the urban areas of the Timaru township, and the existing townships of Temuka, Geraldine, and Pleasant Point;</i> [...]	Accept
Waka Kotahi NZ Transport Agency	143.19	UFD - Urban Form and Development	Objectives	UFD-O1 Settlement Patterns	Acknowledges the objective seeks to achieve consolidated and integrated settlement pattern, which, the submitter supports. However, considers there is a contradiction between achieving this pattern and recognising the existing character of an area which is most likely to be low density residential development.	Amend UFD-O1 as follows: UFD-O1 Settlement Patterns <i>A consolidated and integrated settlement pattern that:</i> [...] <i>v. is well designed, of a good quality, recognises existing character and amenity and is attractive and functional to residents, business and visitors.</i> [...]	Accept in part
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 and manages adverse effects on the environment, including energy consumption, carbon emissions and water use;</i>	Accept in part

Submitter	SubNo.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary	Accept / Reject
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> <i><u>Avoids, remedies, or mitigates adverse effects consistent with the provisions of the plan.</u></i>	Reject
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>[...]</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>	Accept in part
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	Accept in part
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>[...]</i> <i>x. controls the location of activities, primarily by zoning, to minimise <u>reverse sensitivity effects and</u> conflicts between incompatible activities and avoid these where there may be significant adverse effects.</i>	Accept in part
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: <u>UFD-O1 Settlement patterns</u> <i>A consolidated and integrated settlement pattern that:</i> <i>[...]</i> <i>vi. avoids <u>significant adverse effects on</u> areas with important natural, cultural and character values;</i> <i>[...]</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> <i>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.</i>	Accept in part

Submitter	SubNo.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary	Accept / Reject
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> [....]	Accept in part
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[...]; ii. is integrated with the efficient use of infrastructure;</i> [...];	Reject
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.	Accept in part
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.	4. Accept in part
Canterbury Regional Council (Environment Canterbury)	183.19	UFD - Urban Form and Development	General	General	Considers a number of the objectives and policies in the Future Development Area chapter are relevant at a strategic level, and should be incorporated in the Strategic Directions chapter, and/or the Urban Form and Development chapter. Those two chapters are extremely important when considering applications for private plan changes. In addition, more detail is required to ensure that the National	Reconsider the objectives and policies and consider movement of relevant objectives and policies from the Future Development Areas chapter to the Strategic Directions chapter and/or Urban Form and Development Chapter, and ensure the provisions give effect to the NPS-UD and meaning is provided in the local context.	Accept in part

Submitter	SubNo.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary	Accept / Reject
					Policy Statement on Urban Development is given effect and meaning in the local context.		
Canterbury Regional Council (Environment Canterbury)	183.20	UFD - Urban Form and Development	Objectives	UFD-O1 Settlement Patterns	Generally supports UFD-O1 but the reference to versatile soils needs to be changed to refer to highly productive land to be consistent with the NPS for Highly Productive Land 2022 and the objective should be amended to address housing choice to reflect Objective 5.2.1b of the CRPS.	<p>1. Amend UFD-O1 Settlement Patterns as follows: <i>A consolidated and integrated settlement pattern that:</i> [...] <i>vi. avoids areas with important natural, cultural and character values;</i> <i>vii. minimises the loss of versatile soils <u>protects highly productive land</u>; [...]</i></p> <p>AND</p> <p>2. All references in the Plan to "versatile soils" should be changed to "highly productive land" and the provisions made consistent with the NPSHPL 2022.</p> <p>AND</p> <p>3. Amend UFD-O1 to recognise housing choice as an outcome for settlement patterns.</p>	Accept
Canterbury Regional Council (Environment Canterbury)	183.21	UFD - Urban Form and Development	Policies	New	<p>Opposes that there is no minimum yield for new urban areas in the plan. Minimum yields are an important part of ensuring that a range of housing choices are provided, that infrastructure is developed in an efficient manner, and that the rural land resource on the urban fringe is also developed so that it is maximised.</p> <p>[See original submission for full detail].</p>	Amend the Urban Form and Future Development Chapter to include a policy UFD-PX , to ensure that housing in Future Development Areas is developed with a minimum yield of 12 household per hectare over the area of an FDA, and provide for a range of densities within the FDA to ensure that housing choice is provided within new development areas.	Reject
Te Runanga o Ngai Tahu	185.23	UFD - Urban Form and Development	Objectives	UFD-O1 Settlement Patterns	Considers there should be amendments to make this objective to be consistent with the Strategic Direction objectives and the policies of the various plan chapters.	<p>Amend UFD-O1 Settlement Patterns as follows: UFD-O1 Settlement Patterns <i>A consolidated and integrated settlement pattern that:</i> [...] <i>vi. avoids areas with important natural, cultural and or character values; [...]</i> <i>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;</i> <i>xi. improve accessibility and connectivity for people through services, and transport including walking and cycling routes;</i> <i>xii. <u>promotes positive effects, and avoids, remedies, or mitigates adverse effects (including cumulative effects), of urban development on the health and well-being of water bodies, freshwater ecosystems, and receiving environments.</u></i></p>	Accept in part
KiwiRail Holdings Limited	187.17	UFD - Urban Form and Development	Objectives	UFD-O1 Settlement Patterns	Supports clause x. of this strategic direction as it seeks to minimise and avoid conflict between incompatible activities by controlling the location of activities.	Retain UFD-O1 Settlement Patterns, clause x as notified.	Accept in part

Submitter	SubNo.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary	Accept / Reject
Spark New Zealand Trading Limited	208.33	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</i> <i>of infrastructure; [...];</i>	Reject
Chorus New Zealand Limited	209.33	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</i> <i>of infrastructure; [...]</i>	Reject
Vodafone New Zealand Limited	210.33	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</i> <i>of infrastructure; [...];</i>	Reject
Kāinga Ora	229.13	UFD - Urban Form and Development	Objectives	UFD-O1 Settlement Patterns	Considers clause (iii) should be amended to reflect terminology used in the RMA. Concerned that the lower level provisions do not adequately give effect UFD-O1, in particular the Future Development Areas.	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 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>	Accept in part

Submitter	SubNo.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary	Accept / Reject
						<p><i>ii. is integrated with the efficient use <u>of infrastructure</u>;</i></p> <p><i>iii. reduces <u>minimises</u> adverse effects on the environment, including energy consumption, carbon emissions and water use;</i></p> <p><i>iv. protects drinking water supplies from the adverse effects of subdivision, use and development;</i></p> <p><i>[...]</i></p> <p>AND</p> <p>Ensure that lower-level provisions (specifically those relating to Future Development Areas) give effect to UFD-O1.</p>	
Te Tumu Paeroa, Office of the Maori Trustee	240.5	UFD - Urban Form and Development	Objectives	UFD-O1 Settlement Patterns	Submitter generally supports the objectives in the 'Urban Form and Development' chapter. However, considers that ancestral lands needs to be defined to preclude ambiguity within the Proposed Plan.	<p>Amend UFD-O1 as follows: <i>UFD-O1 Settlement Patterns</i> <i>A consolidated and integrated settlement pattern that: [...]</i></p> <p><i>vi. avoids areas with important natural, cultural and character values;</i> <i>vii. minimises the loss of versatile soils;</i> <i>viii. enables papakāika, to occur on ancestral lands</i></p> <p><i><u>and Māori land</u>; [...]</i></p>	Accept in part
Woolworths New Zealand Limited	242.10	UFD - Urban Form and Development	Objectives	New	Seeks that the PDP support and enable future re-zoning of land for commercial and mixed-use purposes. Considers that currently there is no strong directive within the Urban Form and Development Chapter to accommodate plan changes if / when the short-, medium- and long-term business land needs of the District change over time. Submitter considers that the PDP should err on the side of oversupplying business land.	<p>Insert a new Objective to the Urban Form and Development chapter, as follows: <i>UFD-O2 Business Growth</i></p> <p><i><u>Any new areas to support commercial and mixed use, or industrial activities shall primarily occur where:</u></i></p> <p><i><u>i. There is a demonstrated need for additional suitable development capacity;</u></i></p> <p><i><u>ii. A diverse range of services and opportunities is provided for to respond to any specific social and economic needs;</u></i></p> <p><i><u>iii. The type, scale and function of new commercial areas are consistent with, and complementary to, the Centre network;</u></i></p> <p><i><u>iv. The location, dimensions and characteristics of the land are appropriate to support activities that are anticipated within the zone.</u></i></p>	Reject

Submitter	SubNo.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary	Accept / Reject
Woolworths New Zealand Limited	242.1	General	General	General	<p>The submitter notes that the PDP as notified takes a 'centres' approach. Generally support the 'centres hierarchy' approach but considers the notified approach is not adaptive nor responsive to evolving supermarket retailing.</p> <p>The submitter supports a 'centres plus' approach to achieve the best outcomes for the City and its communities. To achieve so, the submitter considers below activity status for supermarkets are appropriate:</p> <ol style="list-style-type: none"> Permitted in all Centre zones; Restricted Discretionary in the Mixed-Use zone for larger-scale supermarkets; Discretionary in the General Industrial zone and General Residential zone. <p>The submitters considers the PDP would limit future re-zoning of land for commercial and mixed use purpose and result in an insufficient land supply. If this approach is not changed through the PDP process, the submitter considers the PDP should enable supermarket activities through a consenting pathway. This will include amending the plan to:</p> <ol style="list-style-type: none"> Establish parameters for consenting assessment relative to what constitutes appropriate out-of-centre activity; How supermarkets can be appropriately consented in Zones other than Centre Zones; Amend the Strategic Directions to provide a positive framework for establishing new business zoned land; Establishing enabling and flexible provisions for commercial activities, especially supermarkets in urban zones. <p>[Refer original submission for full reason]</p>	<ol style="list-style-type: none"> Amend the PDP to address the submitter's concerns to ensure the PDP be adaptive and responsive to evolving supermarket retail to achieve the best outcomes for the District and its communities. Such as providing a "centre plus" approach, or a consenting pathway if the 'centre plus' approach is not adopted. <p>AND</p> <ol style="list-style-type: none"> One way to address the submitter's relief sought is per detailed on specific provisions below. <p>AND</p> <ol style="list-style-type: none"> Any necessary consequential relief to give effect to the submission. 	This is being covered in Hearing B
Horticulture New Zealand	245.41	UFD - Urban Form and Development	Objectives	UFD-O1 Settlement Patterns	<p>Supports the outcome sought of a consolidated and integrated settlement pattern.</p> <p>With the NPS-HPL coming into effect on 17 October 2022, Highly Productive Land is defined as per the meaning in clause 3.5(7) and the plan should align with that definition.</p>	<p>Amend UFD-O1 Settlement Patterns as follows:</p> <p><i>A consolidated and integrated settlement pattern that: i....;</i></p> <p>[...]</p> <p><i>vi. avoids areas with important natural, cultural and character values;</i></p> <p><i>vii. minimises the loss of versatile soils highly productive land;</i></p> <p><i>viii. enables papakāika, to occur on ancestral lands;</i></p> <p>[...]</p>	Accept
White Water Properties LTD	248.3	UFD - Urban Form and Development	Objectives	UFD-O1 Settlement Patterns	<p>Submitter opposes that Future Development Areas have not been referred to within UFD-O1, as they have been specifically identified as appropriate areas for greenfield growth within the District. The objective should confirm that</p>	<p>Amend UFD-O1 Settlement Patterns as follows:</p> <p><i>A consolidated and integrated settlement pattern that:</i></p> <p><i>i. efficiently accommodates future growth and capacity for commercial, industrial, community and residential activities, primarily within the urban areas of the</i></p>	Accept

Submitter	SubNo.	Section/ Appendix	Sub-section	Provision	Submission Point Summary	Relief/ Decision Sought Summary	Accept / Reject
					development within FDA's achieves a consolidated and integrated settlement pattern.	<p>Timaru township, <u>future development areas</u> and the existing townships of Temuka, Geraldine, and Pleasant Point;</p> <p>ii. [...]</p> <p>AND</p> <p>Such other alternative relief that gives effect to the intent of the submission.</p>	

Appendix C - Report Author's Qualifications and Experience

I hold the following qualifications: Bachelor of Science in Ecology and a Masters of Science in Resource Management (an accredited planning degree). I am a full member of the New Zealand Planning Institute (NZPI) and a former Deputy Chair of the NZPI Board. I received a Distinguished Service Award from NZPI in 2017 for contributions to planning and the planning profession. I have approximately 27 years' experience working as a planner for local and central government (in New Zealand and the UK), as well as planning consultancies. My relevant work experience includes, amongst other matters:

- Drafting / co-drafting the strategic directions, natural hazards, transport, coastal environment, industrial, stormwater and infrastructure and energy chapters for the Proposed Timaru District Plan;
- Drafting the strategic directions, natural hazards and commercial and industrial provisions of the Proposed Waimakariri District Plan;
- Co-drafting and leading the review of the CRPS 2013; and
- Hearing submissions (as an independent hearings commissioner) on various chapters of the proposed Selwyn District Plan and proposed plan changes to the Mackenzie District Plan.

I have been the sole director of Planning Matters Limited (a town planning consultancy) since its inception in 2012. I have been engaged by the Timaru District Council on the district plan review as a consultant planner.

Appendix D - Changes between the initial published s42A report and this updated report

In response to further internal review comments and changes arising from integration discussions a number of changes have been made to the initially published Strategic Directions and Urban Form and Development s42A report. These are as follows:

- New section 2.1 to include the national directions changes table, consistent with other s42A reports;
- Under General Submissions, an amended assessment of the submission from Te Rūnanga o Ngāi Tahu [185.16] and removal of the second reference to the same submission point [185.16] elsewhere in the report. The altered assessment resulted in a changed recommendation (from 'reject' to 'accept in part'). Corresponding amendments to Appendix B to delete the duplicate reference and match the remaining single [185.16] reference with the altered recommendation;
- Under SD-O2, insertion of an 'Exposure Draft NPS-IB vs Gazetted NPS-IB table' and inclusion of an assessment of the changes between the documents;
- Under SD-O4, changes to the assessment of the Te Rūnanga o Ngāi Tahu [185.19] submission to refer to consideration of mana whenua matters in Māori reserves for natural hazards matters;
- Under Urban Form and Development, changes to the response to the Te Tumu Paeroa [240.5] submission to replace the reference to 'ancestral land' with the words 'where appropriate'; and
- Re-structured s32AA assessments to achieve greater consistency with other authors.