

**FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO,
SUBMISSION ON NOTIFIED PROPOSED POLICY STATEMENT OR
PLAN, CHANGE OR VARIATION**

Clause 8 of Schedule 1, Resource Management Act 1991

To: Timaru District Council

Name of the person making further submission: **PrimePort Ltd** (submitter S175)

1. This is a further submission on submissions on the proposed Timaru District Plan.
2. PrimePort Ltd is a person who has an interest in the proposal that is greater than the interest of the public generally (in that its operations in Timaru District are directly affected by the proposal).
3. PrimePort wishes to be heard in support of its submission. If others make a similar submission, PrimePort Ltd will consider presenting a joint case with them at a hearing.
4. PrimePort Ltd's further submissions are set out in Annexure 1.

PRIMEPORT LTD

Date: 7 August 2023

Signature: 

(for the submitter) Kim Seaton, Principal Planner, Novo Group Ltd

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Annexure A: Further Submissions by PrimePort Ltd

Submitter name (number)	Submission point	Plan reference	Decision requested by submitter	PrimePort support/oppose	Reason for support/oppose	Decision sought by PrimePort
General						
Environment Canterbury (183)	183.5	General	Amend NH-R3-1 to reflect that this is an overarching permitted activity rule that provides for all earthworks and vegetation clearance associated with existing public flood and erosion protection works operation, maintenance, repair, replacement and upgrading; OR: Create a new rule to reflect the intent of this change;	Support	The requested change provides more clarity.	Accept
Definitions						
Kainga Ora (229)	229.2	Definitions – Hazard Overlay	Delete the proposed hazard overlay(s) being the Earthquake Fault (Infrastructure or Facilities) Awareness Areas; Earthquake Fault (Subdivision) Awareness Areas; Flood Assessment Area; High Hazard Areas and Liquefaction Awareness Area from the District Plan, and instead hold this information in non-statutory GIS maps which sit outside the proposed plan; AND	Oppose in part	Whilst it is agreed that some hazard overlays do need to change over time (particularly flood hazard), non-statutory maps can create even more uncertainty for Plan readers, particularly if the non-statutory maps are difficult to find or there is uncertainty as to how up to date they are.	Reject



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			Amend and make consequential changes to give effect to this submission.			
BP Oil, Mobil Oil New Zealand Limited, Z Energy (196)	196.2	Definitions – Hazardous Facility	Supports the definition of Hazardous Facility which includes a list of exceptions, that include a facility or activity that involves the use, storage or disposal of any hazardous substance.	Support	The definition and list of exceptions is appropriate.	Accept
Alliance Group Limited (173)	173.2	Definitions – High Hazard Area	1. Amend the definition of High Hazard Areas or clarify.	Support in part, oppose in part	<p>The definition is unclear, but the potential implications of this clarification throughout the various parts of the Plan where the term High Hazard Areas is used, is of considerable concern if it results in amendments that would result in Port Zone land being classified as a High Hazard Area.</p> <p>For example, any clarification or amendment that brings coastal hazards, and the Sea Water Inundation Overlay in particular, into the High Hazard Area definition would cause the entirety of the Port Zone to become a High Hazard Area. Consequently, a range of objectives, policies and rules would then apply to the Port</p>	<p>Accept clarification is required.</p> <p>Reject any amendment that would result in Port Zone land being classified as a High Hazard Area; or such other alternative and consequential relief, including relief that ensures land within the Port Zone is not affected by (or is exempted from) any objectives, policies, rules or other provisions that would</p>



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					<p>Zone where previously (as notified) they would appear to not have.</p> <p>This includes consequential rules such as all new Port infrastructure requiring resource consent (Rule NH-R6), new buildings >30m² in area with 2 or more employees (the vast majority of buildings in the Port Zone) being a non-complying activity (Rule NH-R4.2), all subdivision being a non-complying activity (Rule NH-R8), for example. The change in definition would therefore have severe adverse consequences for activity within the Port Zone, and supporting or Port-related industrial activity in particular.</p> <p>Any amendments to the definition of High Hazard Area that would result in Port Zone land being classified as a High Hazard Area is opposed.</p>	<p>apply within a High Hazard Area, in the event the definition of High Hazard Area is changed to include land within the Port Zone.</p>
Environment Canterbury (183)	183.14	Definitions – High Hazard Area	Amend the definition of High Hazard Area to include coastal hazards, and consequential amendment in the Coastal Environment chapter.	Oppose	The notified District Plan did not explicitly include coastal hazards in the High Hazard Area definition, by implication it applied to freshwater flooding only, as	Reject; or such other alternative and consequential relief, including relief that ensures land within the Port Zone is not



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					<p>acknowledged in the ECan submission point.</p> <p>Bringing coastal hazards, and the Sea Water Inundation Overlay in particular, into the High Hazard Area definition would cause the entirety of the Port Zone to become a High Hazard Area. Consequently, a range of objectives, policies and rules would then apply to the Port Zone where previously (as notified) they would appear to not have.</p> <p>This includes consequential rules such as all new Port infrastructure requiring resource consent (Rule NH-R6), new buildings >30m² in area with 2 or more employees (the vast majority of buildings in the Port Zone) being a non-complying activity (Rule NH-R4.2), all subdivision being a non-complying activity (Rule NH-R8), for example. The change in definition would therefore have severe adverse consequences for activity within the Port Zone, and supporting or Port-related industrial activity in particular.</p> <p>Any amendments to the definition of High Hazard Area that would</p>	<p>affected by (or is exempted from) any objectives, policies, rules or other provisions that would apply within a High Hazard Area, in the event the definition of High Hazard Area is changed to include land within the Port Zone.</p>



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					result in Port Zone land being classified as a High Hazard Area is opposed.	
Penny Nelson, Director-General of Conservation Tumuaki Ahurei (166)	166.17	Definitions - new	Add a new definition for 'risk' consistent with the definition of risk in the New Zealand Coastal Policy Statement (NZCPS).	Oppose	Further definition of risk is not required.	Reject
Fonterra Ltd (165)	165.16	Definitions – noise sensitive activity	Amend noise sensitive activity to include community facility or place of assembly.	Support	Agree these facilities can give rise to reverse sensitivity effects.	Accept
KiwiRail Holdings Limited (187)	187.13	Definitions – reverse sensitivity	Amend the definition	Support	The amended definition is appropriate.	Accept
KiwiRail Holdings Limited (187)	187.14	Definitions – sensitive activity	Amend the definition.	Support	The amended definition is appropriate.	Accept
Silver Fern Farms (172)	172.11	Definitions – sensitive activity	Amend the definition to exclude season worker accommodation and caretaker dwellings.	Oppose in part	The exclusion of caretaker dwellings is accepted, but the exclusion of seasonal worker accommodation could potentially result in incompatible accommodation locating in	Reject reference to seasonal worker accommodation.



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					environments that aren't appropriate.	
Royal Forest and Bird Society (156)	156.31	Definitions – sensitive environment	Amend the definition of Sensitive Environment to include identified areas important for highly mobile species.	Oppose	The implications of the amendment for the Port are unclear and add uncertainty.	Reject
Fulton Hogan (170)	170.5	Definitions – sensitive environment	1. Delete the definition of Sensitive Environment; AND 2. Include overlays/activities which trigger additional assessment in the relevant plan rule.	Support	The requested amendment provides additional clarity.	Accept
Environment Canterbury (183)	183.10	Definitions – Urban Area	Amend the definition of Urban Area, to better tie in with the suggested definition of urban Development.	Oppose in part	PrimePort opposes the definition of urban development as it does not clearly include the Port Zone and therefore opposes this definition too.	Reject
Environment Canterbury (183)	183.9	Definitions – Urban development	Delete and replace definition of urban development.	Oppose in part	The replacement definition does not clearly list the Port Zone, which contains urban development.	Reject

Strategic Directions



Submitter name (number)	Submission point	Plan reference	Decision requested by submitter	PrimePort support/oppose	Reason for support/oppose	Decision sought by PrimePort
Kāinga Ora (229)	229.9	SD-O4	Amend to refer to human health and safety	Support in part	The amendment provides clarification of what risks are of key concern.	Accept
BP Oil, Mobil Oil New Zealand Limited, Z Energy (196)	196.17	SD-O4	Amend SD-O4	Oppose in part	Primeport agrees with the submitter's concerns around unacceptable risk, but the proposed amendment text does not make sense.	Reject
Fonterra Limited (165)	165.30	SD-O6	Amend SD-O6	Support in part	Agree it would be helpful for the objective to refer to "existing and new" business activities, but the remainder of the change to clause (i) is not necessary and potentially makes the clause more restrictive than it should be. Proposed clause (iii) is supported.	Accept in part, to refer to existing and new businesses, and new clause (iii).
KiwiRail Holdings Limited (187)	187.16	SD-O8	Amend SD-O8 to refer to reverse sensitivity effects.	Support	Regionally significant infrastructure can be vulnerable to reverse sensitivity effects.	Accept
Urban Form and Development						
Royal Forest and Bird Society (156)	156.48	UFD - new	Add new objective UFD-OX Avoids, remedies, or mitigates adverse effects consistent with the provisions of the plan.	Oppose in part	The intent behind the new objective request is reasonable, but the new objective itself is not necessary, it is a requirement of the RMA and a clear requirement throughout the Plan.	Reject



Submitter name (number)	Submission point	Plan reference	Decision requested by submitter	PrimePort support/oppose	Reason for support/oppose	Decision sought by PrimePort
Energy and Infrastructure						
Royal Forest and Bird Society (156)	156.62	General	Amend the EI Chapter (including objectives and policies) to avoid conflicts with other chapters addressing s6 RMA matters and giving effect to the NZCPS.	Oppose in part	Whilst the reasons for the submission are not unreasonable, the Plan is considered to appropriately achieve this outcome already.	Reject
Royal Forest and Bird Society (156)	156.52	EI-O1	Include reference to emissions reduction	Oppose in part	Whilst PrimePort supports emissions reduction within its activities, it is not a matter that is always practicable to achieve in a Port environment. If reference to emissions reduction is included, it should also include "to the extent practicable".	Reject or also include "to the extent practicable".
Waka Kotahi NZ Transport Agency (143)	143.22	EI-O2	Retain.	Support	Retain as it appropriately provides for RSI.	Accept
Transpower NZ Limited (159)	159.34	EI-O4	Remove word "efficient"	Support	Agree the word efficient is unnecessary.	Accept
Kāinga Ora (229)	229.18	EI-O4	Amend to remove reference to upgrading or development of RSI.	Oppose	The notified wording is preferred.	Reject



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Timaru District Council (42)	42.18	EI-P1	Amend to refer to relocation, repair, upgrade, maintenance and other necessary works required.	Support	The amendment provides more certainty for RSI.	Accept
Royal Forest and Bird Society (156)	156.57	EI-P1	Amend to refer to “providing for” etc.	Oppose	The notified wording is preferred.	Reject
Royal Forest and Bird Society (156)	156.58	EI-P2	Amend the wording to split the policy per NPS direction.	Oppose in part	Splitting the policy is acceptable but the notified wording is otherwise preferred to the extent the policy affects the Port of Timaru.	Reject
Kāinga Ora (229)	229.20	EI-P2	Amend the wording to refer to acceptable effects and minimising adverse effects on human health, wellbeing and amenity	Oppose	The wording introduces uncertainty for RSI.	Reject
BP Oil, Mobil Oil New Zealand Limited, Z Energy (196)	196.24	EI-P3	Amend to refer to new “or modified” incompatible activities.	Support	The wording provides greater certainty for RSI.	Accept
Kāinga Ora (229)	229.21	EI-P3	Amend to refer to a managing reverse sensitivity effects.	Oppose	The notified wording is preferred.	Reject
Royal Forest and Bird Society (156)	156.61	EI Rules Note	Delete the words “unless otherwise specified in this chapter” and make clear that other district wide chapters will apply.	Oppose	The requested amendments will create uncertainty and unnecessary consenting requirements for infrastructure.	Reject



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Royal Forest and Bird Society (156)	156.63	EI-R1	Amend so that removal of infrastructure is not permitted in the coastal environment.	Oppose	The coastal environment includes the Port Zone, including large areas of established industry. The proposed amendment is not practicable in the Port Zone.	Reject
Royal Forest and Bird Society (156)	156.70	EI-R23	Amend so that new infrastructure is not permitted in the coastal environment.	Oppose	The coastal environment includes the Port Zone, including large areas of established industry. The proposed amendment is not practicable in the Port Zone.	Reject
Royal Forest and Bird Society (156)	156.71	EI-R25	Amend so that maintenance and repair of infrastructure is not permitted in the coastal environment.	Oppose	The coastal environment includes the Port Zone, including large areas of established industry. The proposed amendment is not practicable in the Port Zone.	Reject
Rooney Holdings Limited (174)	174.14	EI-R26(2)	Delete R26(2).	Support	The rule is onerous.	Accept
Stormwater Management						
Kāinga Ora (229)	229.24	General	Delete the stormwater chapter.	Support in part	The concerns expressed by the submitter are supported.	Accept
Waka Kotahi NZ Transport Agency (143)	143.32	SW-P2	Amend to maintain or enhance.	Support	If the policy is retained, the amended wording is more practicable.	Accept.



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Transport						
KiwiRail Holdings Limited (187)	187.34	TRAN-P4	Amend to refer to new land transport infrastructure and functional or operational need.	Support	The requested amendments are practical.	Accept.
Fonterra Limited (165)	165.40	TRAN-P8	Amend so that landscaping is not a requirement for all parking areas.	Support	The requested amendments are practical and reduce the onerous nature of the rule.	Accept
Contaminated Land						
Royal Forest and Bird Society (156)	156.84	CL new	New standard or rule to protect indigenous biodiversity	Oppose	The requested amendments are not necessary.	Reject
Natural Hazards						
Silver Fern Farms (172)	172.22	NH-O1	Amend to be more practicable for high hazard areas.	Support	If the definition of high hazard areas is amended to include the Sea Water Inundation Layer, this objective has significantly adverse implications for the Port Zone.	Accept
Royal Forest and Bird Society (156)	156.85	NH-O3	Amend to refer to native species and natural habitat.	Oppose	The requested amendments are not practicable and introduce uncertainty.	Reject



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Waka Kotahi NZ Transport Agency (143)	143.66	NH-O2	Retain as notified.	Support	It is impractical to locate all RSI outside of High Hazard Areas, particularly if coastal inundation is defined as contributing to high hazard.	Accept
Transpower New Zealand Ltd (159)	159.63	NH-P11	Amend so that policy only refers to High Hazard Areas	Support	The requested wording would make the policy more practicable.	Accept
Environment Canterbury (183)	183.33	NH-P4	Amend to refer to natural hazard sensitive activities.	Support	The requested wording would make the policy more practicable.	Accept
Waka Kotahi NZ Transport Agency (143)	143.67	NH-P5	Amend to refer to operational needs.	Support	The requested wording would make the policy more practicable.	Accept
Silver Fern Farms (172)	172.28	NH-P10	Amend so there is not an unqualified avoidance policy.	Support	If the definition of high hazard areas is amended to include the Sea Water Inundation Layer, this policy has significantly adverse implications for the Port Zone.	Accept
Environment Canterbury (183)	183.38	NH-R1	Amend to change heading and other amendments	Support in part Oppose in part	The amended heading is misleading/confusing as it implies the rule deals with structures and buildings when it appears to be intended to deal with earthworks only. The heading change, and changes to include structures and buildings, is opposed.	Accept and reject, as set out in PrimePort's reasons for this submission.



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					<p>Reference to the areas subject to earthworks rather than the whole site, is a practical and supported change.</p> <p>Reference to the high hazard area in PER-2 could potentially result in resource consent being required for most earthworks, however small, in the Port Zone (if the Sea Water Inundation Overlay is included), which is overly onerous, this change is not supported.</p> <p>Reference to buildings and structures in a new PER-3 is not supported.</p>	
Timaru District Council (42)	42.31	NH-R4	Amend to exclude RSI.	Support	The requested amendment is practicable.	Accept
Alliance Group Limited (173)	173.27	NH-R4	Amend as necessary to clarify that land in the Sea Water inundation Overlay is not subject to non-complying consenting pathway.	Support	If the Sea Water Inundation Overlay is included, the rule would be highly onerous in the Port Zone. Oppose non-complying activity status within the Sea Water Inundation Overlay.	Accept
Opuha Water Limited (181)	181.55	NH-R4	Amend to exclude RSI.	Support	Port of Timaru is included in a flood overlay and this rule as notified as potentially highly problematic.	Accept.
Transpower New Zealand Ltd (159)	159.64	NH-R5	Amend to refer to repair and the structure of the infrastructure.	Support	The proposed amendment is practical.	Accept



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BP Oil, Mobil Oil New Zealand Limited, Z Energy (196)	196.54	NH-R5	Amend to exclude underground infrastructure	Support	The proposed amendment is practical.	Accept
Opuha Water Limited (181)	181.56	NH-R6	Amend NH-R6.3 to allow new RSI in the High Hazard Risk Overlay as a permitted activity subject to compliance with a condition requiring that the infrastructure has been designed to maintain its integrity and function during and after a natural hazard event (or an alternative condition with similar effect).	Support in part	If Sea Water Inundation Overlay is included in the definition of high hazard area, this rule has considerable adverse implication for PrimePort, requiring resource consent for all new development within the Port. The wording is supported for this reason.	Support
Alliance Group Limited (173)	173.30	NH-S1	Clarify application of High Hazard Area to Sea Water Inundation Overlay and oppose NH-S1 if the Overlay is included.	Support	The matter is currently confusing.	Accept
Silver Fern Farms (172)	172.32	NH-R8	Amend rule NH-R8 Subdivision and other provisions as necessary to clarify that the subdivision of land in the Sea Water Inundation Overlay is not subject to a non-complying consenting pathway under the 'High Hazard Area Overlay'.	Support	If the Sea Water Inundation Overlay is within a High Hazard Area Overlay, a non complying pathway would be hugely onerous in the Port Zone.	Accept



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Hazardous Substances						
BP Oil, Mobil Oil New Zealand Limited, Z Energy (196)	196.59	HS-O2	Amend to also refer to increased scale or intensity of existing sensitive activities.	Support	The proposed amendment is practicable.	Accept
BP Oil, Mobil Oil New Zealand Limited, Z Energy (196)	196.61	New	Insert new policy for good practice measures	Support in part	As the definition of High Hazard Area is not yet confirmed (following submissions), it is unclear if this policy would apply to the Port Zone. To the extent that it may, this submission point is supported.	Accept
Coastal Environment						
Environment Canterbury (183)	183.109	General	Amend the chapter for consistency with CRPS Policy 11.3.1	Oppose	Whilst consistency with Policy 11.3.1 is to be provided for, it is critical that policy 11.3.4 also be reflected, given the Port of Timaru and supporting business activity must be located in the Coastal Environment.	Ensure amendments reflect the need for Port of Timaru and supporting business activity to locate in the coastal environment.
Silver Fern Farms (172)	172.78	CE-O2	Retain as notified	Support	Agree with the submitter that public access to the coastal environment should not be required in all locations.	Accept



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Royal Forest and Bird Society (156)	156.145	CE-O4	Amend to capture climate response and adaptation.	Oppose	The notified wording is preferred.	Reject
Penny Nelson, Director-General of Conservation Tumuaki Ahurei (166)	166.110	CE-O5	Amend to give effect to NZCPS	Support in part	The requested wording is sufficiently clear and the provision for hard engineering to occur where it is appropriate remains.	Support
Royal Forest and Bird Society (156)	156.147	CE-O6	Amend so that some activities may be inappropriate and Port of Timaru wording is deleted.	Oppose	The notified wording is more practicable and preferred.	Reject
Silver Fern Farms (172)	172.80	CE-O6	Amend to provide for activities located in highly modified parts of the coastal environment that may not be urban.	Oppose in part	The submitter's point about Pareora processing site is accepted but PrimePort prefers reference to the Port of Timaru remain explicit	Reject
Transpower NZ Limited (159)	159.84	CE-P10	Amend to reference RSI.	Oppose	The notified wording is preferred, which refers to infrastructure more generally rather than just RSI. The amended wording is somewhat confusing.	Reject
Hilton Haulage Ltd Partnership	168.7	CE-P12	Amend to delete "avoid" and replace with "manage"	Support	The submitter's request is consistent with the concerns PrimePort expressed in its	Accept



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					submission, being that the use of “avoid” sets too high a threshold.	
Royal Forest and Bird Society (156)	156.160	CE-P13	Amend CE-P13.	Oppose	The proposed wording is too restrictive of RSI.	Reject
Penny Nelson, Director-General of Conservation Tumuaki Ahurei (166)	166.116	CE-P13	Amend CE-P13 to refer to not exacerbating natural hazards.	Oppose	The proposed wording is too restrictive of RSI and the Port of Timaru in particular.	Reject
Silver Fern Farms (172)	172.88	CE-P14	Amend CE-P14 to ensure it does not inappropriately foreclose on the ability to use engineering measures to mitigate coastal hazards.	Support in part	The policy should not inappropriately foreclose the ability to use engineering measures where natural measures are insufficient.	Accept (1)
Environment Canterbury (183)	183.129	CE-R11	Make subdivision in the Sea Water Inundation Overlay non complying or fully discretionary, or alternative wording.	Oppose	The Port Zone is within the Sea Water Inundation Overlay. Activities locate there as a necessity due to proximity to the Port of Timaru. Activity in that area must continue to be enabled.	Reject
Royal Forest and Bird Society (156)	156.169	CE-R12	Insert reference to indigenous biodiversity.	Oppose in part	Oppose in respect of its application to works undertaken by PrimePort.	Reject
Environment Canterbury (183)	183.130	CE-R12	Delete CE-R12 or amend.	Oppose in part	PrimePort has no strong preference as to one or two rules, but requires	Reject.



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					that CE-R9 include works undertaken by PrimePort, per CE-R12. CE-R9 currently does not provide for PrimePort works.	
Environment Canterbury (183)	183.125	CE-R4	Amend CE-R4.4, 4.5 and 4.6.	Oppose in part	The Port Zone is within the Sea Water Inundation Overlay. Activities locate there as a necessity due to proximity to the Port of Timaru. Activity in that area must continue to be enabled. PrimePort would consider a rule specific to the Port Zone, to the extent that it were consistent with PrimePort's own submissions on this rule.	Reject provisions that make Port and associated development in the Port Zone more onerous. Accept to the extent that specific exemptions may be made for Port and related industrial activity.
Simo Enterprises Ltd (148)	148.3	CE-R4	Amend CE-R4 Buildings and structures and extensions [...] sub clause 4 Sea Water Inundation Overlay within urban areas with following changes: 1. Remove 25m ² limit on new buildings or extensions (PER-1). 2. Enable development within Industrial Land if flood modelling can be provided and buildings can be demonstrated to be safe.	Support	Agree that the requirements for the overlay are too restrictive in existing urban zones and industrial areas in particular, including the Port Zone (which includes provision for related industry).	Accept



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			<p>3. If residential dwellings are provided this could be above ground floor area within appropriate zones.</p> <p>4. Remove 10-year period parameter criteria.</p> <p>5. Remove matter of discretion point 3.</p>			
Royal Forest and Bird Society (156)	156.167	CE-R7	Amend to exclude upgrade.	Oppose	The proposed amendments could unduly restrictive the operations of Port of Timaru.	Reject
Environment Canterbury (183)	183.126	CE-R7	Amend CE-R7.1 to be consistent with the approach for activities in the Natural Hazards chapter, in particular high hazard activities	Oppose in part	The Port Zone is within the Sea Water Inundation Overlay, which the submitter seeks to include as a High Hazard Area. The Port of Timaru, as RSI, must be enabled to maintain and upgrade its facilities.	Reject
Environment Canterbury (183)	183.128	CE-R9	Amend CE-R9 in line with other submission points and to remove text "including..."	Oppose in part	PrimePort would oppose any changes to the rule that would make maintenance, replacement or upgrading of the natural hazard mitigating works more onerous than is currently the case, noting PrimePort's submission on CE-R9. Removal of the words "including..." from the title of CE-R9 is acceptable.	Reject



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Environment Canterbury (183)	183.132	CE-S2	Clarify relationship with R4 and apply lower threshold.	Oppose	Reference to the zone standards in the urban area is more appropriate.	Reject
Light						
Waka Kotahi NZ Transport Agency (143)	143.109	General	Further consideration of the terminology used in this chapter.	Support	Further consideration of terminology would be reasonable.	Support
Fonterra Limited (165)	165.98	Light-O2	Retain as notified	Support	Agree it is appropriate to recognise the benefits of lighting too.	Support
Noise						
Royal Forest and Bird Society (156)	156.173	Noise - new	Insert a new policy addressing noise impacts on native fauna.	Oppose	Without knowing the wording sought for the policy it is unclear what impact this could have on Port operations.	Reject.
Kainga Ora (229)	229.58	Noise – P7	Delete Noise P7 and replace with a new policy.	Oppose	The existing policy is appropriately worded to support the operation of Port of Timaru. Without knowing the wording sought for the new policy it is unclear what impact this could have on Port operations.	Reject
Environment Canterbury (183)	183.143	Noise -R8	Consider amendments to align, where possible, with Rule 8.21 of the CRCEP.	Oppose in part	PrimePort is not opposed to considering the alignment between R8 and Rule 8.21, but opposes any changes that would make Port	Reject



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					operations more difficult or uncertain.	
GJH Rooney (191)	191.72	Noise-R9	Amend so does not apply to alterations to buildings.	Oppose	Alterations can include extensions to existing noise sensitive activities that may increase the risk of reverse sensitivity effects.	Reject
Relocated buildings and shipping containers						
House Movers Section of the New Zealand Heavy Haulage Association Inc (184)	184.1	RELO-R1	Amend rule.	Oppose in part	PrimePort is not averse to the amendment of RELO-R1.2, but prefers the original wording of R1.1, which provides for more flexibility within the Port Zone.	Reject in respect of R1.1
Signs						
Out of Home Media Association of Aotearoa (188)	188.10	Sign-S3	Amend height limit in Port Zone to 8m.	Support	The amendment would allow more flexibility for signs.	Support
PORTZ						
Property Income Fund No.2 Limited (56)	56.3	PORTZ-P1	Broaden to enable a wider range of industrial activities in the zone.	Oppose	Enabling a wider range of industrial activity could potentially allow industrial activity that has no operational need to locate adjacent	Reject



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					the Port, to locate in the PORTZ. There is limited land supply for industrial activity adjacent the Port, and as such it is preferred that Port-related industry be enabled.	
Planning Maps						
Environment Canterbury (183)	183.133	Coastal Erosion overlay	Amend the Overlay to affect Caroline Bay and South Beach.	Oppose	Without knowing the extent of the overlay changes, PrimePort is concerned the potential change could adversely affect Port operations.	Reject
Kainga Ora (229)	229.39	Definitions – Hazard Overlay	Delete the proposed hazard overlay(s) being the Earthquake Fault (Infrastructure or Facilities) Awareness Areas; Earthquake Fault (Subdivision) Awareness Areas; Flood Assessment Area; High Hazard Areas and Liquefaction Awareness Area from the District Plan, and instead hold this information in non-statutory GIS maps which sit outside the proposed plan.	Oppose in part	Whilst it is agreed that some hazard overlays do need to change over time (particularly flood hazard), non-statutory maps can create even more uncertainty for Plan readers, particularly if the non-statutory maps are difficult to find or there is uncertainty as to how up to date they are.	Reject