

## Chapter: SASM – Sites and Areas of Significance to Maori

Feed-back No.	Section	Sub-section	Plan Provision	Feedback	Relief sought
<a href="#">132.6</a>	SASM – Sites and areas of significance to Maori	General		<p><i>SITES AND AREAS OF SIGNIFICANCE TO MAORI</i></p> <p><i>We feel that under the RMA. This is covered and we do not need any more restrictions. With the proposed Plan 7 plans we feel that water storage is going to be a significant mitigation tool for our water issues and more cost with extra consents isn't needed.</i></p>	<p>Outcome we seek</p> <p>Let the Ecan and the RMA. Rules be enough.</p>
<a href="#">141.107</a>	SASM – Sites and areas of significance to Maori	General		<p><i>From ██████ review of the online planning maps and discussions with growers in the District – it appears that there is some growing activity that is located within the areas identified as Sites of Significance to Maori including: Wāhi tūpuna areas, Wai Taoka and Wahi Toaka.</i></p> <p><i>It is important that existing operations are enabled to continue – recognising that for activities such as commercial vegetable growing, crop rotation (where a crop might be in pasture for a number of years as part of the rotation before going back in to potatoes for example) is a part of the existing environment.</i></p> <p><i>██████ recognises that cultivation, by virtue of the earthworks definition, is not captured by the ‘Earthworks’ rules. However as discussed below, there are earthworks outside of this definition that occur as part of normal farming operations which we seek specific provisions for as ‘ancillary rural earthworks’.</i></p> <p><i>Specific commentary on the provisions is provided below. As a general comment, some aspects of the plan maps are unclear:</i></p> <ul style="list-style-type: none"> <li><i>· It appears that the Wāhi tūpuna areas may be labelled incorrectly as ‘Wai Tupuna’ areas in the Legend.</i></li> <li><i>· The status of the ‘Wai Taoko line’ as the term ‘Wai Taoka Line’ is not referenced in the Plan.</i></li> </ul>	<p>Consider - and review maps</p>
<a href="#">143.41</a>	SASM – Sites and areas of significance to Maori	General		<p><i>Sites and Areas of Significance to Māori</i></p> <ul style="list-style-type: none"> <li><i>· The chapter provides a policy framework for identification of relevant sites and areas, as well as methods relating to earthworks, new buildings, vegetation clearance etc.</i></li> </ul>	<ul style="list-style-type: none"> <li><i>· ██████ request that the use of the “Wai Tupuna” Overlay on the planning maps is clarified as it appears to be</i></li> </ul>

			<ul style="list-style-type: none"> <li>· <i>The sites and areas of significance to Māori (“SASM”) are broken into four overlays:</i></li> <li>- <i>Wāhi Tupuna: Broader geographical areas and cultural landscapes of significance to Kāi Tahu, which may contain a number of Wāhi Tapu or Taoka</i></li> <li>- <i>Wāhi Taoka: Places that are treasured for their intrinsic values and critical role in sustaining life</i></li> <li>- <i>Wāhi Tapu: Sacred sites or areas held in reverence according to whakapapa</i></li> <li>- <i>Wai Tapu and/or Taoka: Sacred or treasured waterways</i></li> <li>- <i>The planning maps show a “Wai Tupuna” across some areas in the district. However, there is no mention of this overlay in the plan’s corresponding text. This requires correction or clarification in the Proposed Plan.</i></li> <li>· <i>The SASM Overlays in general cover large geographical areas in the District as seen on the Draft Plan’s maps. It is unclear from the mapped information what the actual extents of each Overlay are (i.e. the difference between a Wāhi Tupuna extent and a Wāhi Taoka extent) and what has informed their spatial extents.</i></li> </ul> <p><i>As currently proposed under the Draft Plan, these Overlays apply differing constraints on development, particularly for residentially zoned properties. Earthworks within Wāhi Tupuna Overlays are more specific than the general provisions, and within the Wāhi Taoka Overlay the provisions typically allow for a maximum building height of 5m above ground level and maximum building coverage of 300m<sup>2</sup> as permitted activities. Whilst this is enabling of reasonable use in rural areas (in accordance with s85 of the RMA), this is particularly restrictive where the Overlays apply across the urban zones (e.g. areas zoned as MDRZ and Local Centre Zone around Waimataitai), as it may discourage site redevelopment towards higher density typologies.</i></p> <p><i>Sites and Areas of Significance to Māori</i></p>	<p>missing in the corresponding text of the Plan itself.</p> <ul style="list-style-type: none"> <li>· Further information in the justification of the spatial extents of the Sites and Areas of Significance to Māori and how these have been identified.</li> </ul>
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<a href="#">24.2</a>	SASM – Sites and areas of significance to Maori	General	General	█████ supports the commitment to recognise the cultural beliefs and values of Kāti Huirapa and to work in partnership with Kāti Huirapa as outlined in the objectives and policies. ██████ supports the commitment to actively involve Kāti Huirapa in decision making that affect sites and areas of significance to Kāti Huirapa.	
<a href="#">50.2</a>	SASM – Sites and areas of significance to Maori	General	General	The second proposed change that the board feels needs more discussion, are the areas proposed to be identified within the Draft Plan as sites and areas of significance to Māori. The local land owners and iwi need more time and opportunities to be consulted to develop a plan, that allows all concerned parties to present their views and concerns. ██████ believe that some of the definitions used within the Draft Plan relating to sites and areas of significance to Māori are too broad for the conditions that have been applied to them. Areas defined as SASM5 could relate to any land area in New Zealand. ██████ believe that some of	

				<p><i>the proposed changes, if unchallenged could set new precedences that could have negative effects within our own district and beyond.</i></p> <p><i>██████████ feel that more time is necessary for communication on these proposed changes. This will allow decisions to be made that will give a long-term benefit to all those within our community.</i></p>	
<a href="#">71.15</a>	SASM – Sites and areas of significance to Maori	General	General	<p><i>This submission point relates to ██████████ - ██████████ being located within SASM-4.</i></p> <p><i>Chapter SASM relates to the mapped sites and areas of significance to Maori. These areas are very broad. ██████████ recognises that the RMA does not mandate consultation and that consultation should not replace the Council’s own RMA obligations (eg: in respect of Section 8 RMA). In that context, ██████████ generally supports the encouragement for consultation with Kati Huirapa where it is appropriate and necessary and considers that amendments are required to ensure that consultation is meaningful and effective. To be clear, the Council is neither supporting applicants nor Maori by imposing generic consultation requirements over a wide area of land and irrespective of activities or issues – any requirement for consultation should be specific and justifiable.</i></p>	
<a href="#">100.11</a>	SASM – Sites and areas of significance to Maori	General	General	<p><i>In the introduction for this draft district plan, it is stated that “Development of the plan has been carried out over a number of years and has involved extensive consultation with stakeholders. It has been a collaborative process...”, yet the section that arguably has potentially the most impact and restrictions on landowners has not been discussed with any of them.</i></p> <p><i>It is completely unacceptable to use the plan or future versions of it, as an effective and meaningful engagement tool.</i></p> <p><i>The SASMs identified in the draft plan cover a substantial part of the Timaru district and are significantly different from ██████████, which is the ██████████.</i></p> <p><i>██████████ is dedicated to recording and mapping the traditional Maori place names and associated histories in the Ngai Tahu rohe (tribal area). Place names are tangible reminders of the history and values. They represent a significant symbol of the Ngai Tahu historical association and relationship with the landscape. They are primarily associated with people, historical events, geographical features, and natural flora and fauna.</i></p>	

				<p>The online, digital [REDACTED] – has information about ara tawhito (traditional travel routes), Native Reserves and other original Maori land allocations.</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>It is unclear as to why these rules are needed, when buildings, earthworks, indigenous vegetation clearance etc are already managed within the SASM overlay through rules in other sections.</p> <p>The application of the proposed rules to the five SASM areas is inconsistent.</p>			
<a href="#">43.46</a>	SASM – Sites and areas of significance to Maori	Objectives	SASM-O1 Decision making Kāti Huirapa	Retain as proposed or preserve the original intent.			
<a href="#">49.112</a>	SASM – Sites and areas of significance to Maori	Objectives	SASM-O1 Decision making Kāti Huirapa	<table border="1"> <tr> <td>Support</td> <td>[REDACTED] supports the promotion of active involvement of Kati Huirapa in decision making that affects the values of the identified sites and areas of significance to them.</td> </tr> </table>	Support	[REDACTED] supports the promotion of active involvement of Kati Huirapa in decision making that affects the values of the identified sites and areas of significance to them.	
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<a href="#">119.2</a>	SASM – Sites and areas of significance to Maori	Objectives	SASM-O1 Decision making Kāti Huirapa	A more rigorous process to determine and define (limit) what is actually a site and area of significance. To be able to prove this is so.			
<a href="#">43.49</a>	SASM – Sites and areas of significance to Maori	Objectives	SASM-O2 Access and use Kāti Huirapa a	Retain as proposed or preserve the original intent.			
<a href="#">119.1</a>	SASM – Sites and	Objectives	SASM-O2 Access	This should be limited to public land and access ways.			

	areas of significance to Maori		and use Kāti Huirapa a	<i>It is not appropriate for Kati Huirapa to have access to any private property which is in an area that this plan identifies as an area of significance to Maori.</i>			
<a href="#">43.45</a>	SASM – Sites and areas of significance to Maori	Objectives	SASM-O3 Protection of sites and areas of sig	<i>Retain as proposed or preserve the original intent.</i>			
<a href="#">119.10</a>	SASM – Sites and areas of significance to Maori	Objectives	SASM-O3 Protection of sites and areas of sig	<p><i>The policies and rules within this section of the draft plan refer to Schedule 7 of the plan. Of concern is:</i></p> <ul style="list-style-type: none"> <li>• <i>The spatial extent of land over which the rules would apply, and</i></li> <li>• <i>The activities which would be constrained by the rules.</i></li> </ul> <p><i>The schedules of sites and areas of significance within Schedule 7 are often quite broad, and some encompass a large area, in particular SASM23. The rules linked to these schedules would apply over these areas. It is not clear on what basis the sites and areas of significance were determined, or other than rivers, streams, and the like, what in particular within these areas is of significance. If there are specific areas or sites of significance (and recognising some may be interconnected) the plan could be more specific to these areas and sites. This may better enable the outcomes sought</i></p> <p><i>New plans need to protect existing use as expressed in the RMA.</i></p>			
<a href="#">49.75</a>	SASM – Sites and areas of significance to Maori	Objectives	General	<table border="1"> <tr> <td style="text-align: center;">Support</td> <td>██████ supports the promotion of active involvement of Kati Huirapa in decision making that affects the values of the identified sites and areas of significance to them.</td> </tr> </table>	Support	██████ supports the promotion of active involvement of Kati Huirapa in decision making that affects the values of the identified sites and areas of significance to them.	
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<a href="#">49.6</a>	SASM – Sites and areas of significance to Maori	Policies		<table border="1"> <tr> <td style="text-align: center;">Support</td> <td>██████ supports the promotion of active involvement of Kati Huirapa in decision making that affects the values of the identified sites and areas of significance to them. In particular ██████ supports early consultation as encouraged in SASM-P2.</td> </tr> </table>	Support	██████ supports the promotion of active involvement of Kati Huirapa in decision making that affects the values of the identified sites and areas of significance to them. In particular ██████ supports early consultation as encouraged in SASM-P2.	
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49.116	SASM – Sites and areas of significance to Maori	Policies		<table border="1" style="width: 100%;"> <tr> <td style="width: 15%; text-align: center;">Support</td> <td> <p>█████ supports the promotion of active involvement of Kati Huirapa in decision making that affects the values of the identified sites and areas of significance to them. In particular █████ supports early consultation as encouraged in SASM-P2.</p> </td> </tr> </table>	Support	<p>█████ supports the promotion of active involvement of Kati Huirapa in decision making that affects the values of the identified sites and areas of significance to them. In particular █████ supports early consultation as encouraged in SASM-P2.</p>	
Support	<p>█████ supports the promotion of active involvement of Kati Huirapa in decision making that affects the values of the identified sites and areas of significance to them. In particular █████ supports early consultation as encouraged in SASM-P2.</p>						
66.3	SASM – Sites and areas of significance to Maori	Policies		<p><i>The policies and rules within this section of the draft plan refer to Schedule 7 of the plan. Of concern is:</i></p> <ul style="list-style-type: none"> <li>• <i>The spatial extent of land over which the rules would apply, and</i></li> <li>• <i>The activities which would be constrained by the rules.</i></li> </ul> <p><i>The schedules of sites and areas of significance within Schedule 7 are often quite broad, and some encompass a large area, in particular SASM23. The rules linked to these schedules would apply over these areas. It is not clear on what basis the sites and areas of significance were determined, or other than rivers, streams, and the like, what in particular within these areas is of significance. If there are specific areas or sites of significance (and recognising some may be interconnected) the plan could be more specific to these areas and sites. This may better enable the outcomes sought.</i></p> <p><i>It is suggested that the draft rules are reviewed as to what is sought to be controlled, what may require resource consent, where, and why. A requirement to obtain a resource consent, and the resource consent process, may not in itself be the best way to achieve the objectives sought. Consenting also raises capacity, capability, time and cost issues for both potential applicants, the runanga, and the council.</i></p>			
43.42	SASM – Sites and areas of significance to Maori	Policies	SASM-P3 Use of sites and areas for cultural	<p><i>Retain as proposed or preserve the original intent.</i></p>			
43.33	SASM – Sites and areas of	Policies	SASM-P4 Cultural access	<p><i>Retain as proposed or preserve the original intent.</i></p> <p>█████ supports access to sites of significance being enabled for Kati Huirapa.</p>			

	significance to Maori		Maintain existing		
<a href="#">71.17</a>	SASM – Sites and areas of significance to Maori	Policies	SASM-P4 Cultural access	<p><i>This submission point relates to [REDACTED] - [REDACTED] being located within SASM-4.</i></p> <p><i>SASM-P4 seeks to maintain existing access, and to encourage landowners and applicants to explore opportunities and methods to enhance access to the sites and (general) areas of significance. The appropriateness of seeking to enhance access on private land over private per se is questioned.</i></p> <p><i>Amend SASM-P4 the policy to appropriately tie access into the values of the site or area that has been recognised. It should, for example, be very clear what values are to be maintained, enhanced and/or protected, so that a reasonable and informed decision can be made as to not only the extent to which consultation is considered necessary, but also to what extent to which access is and should be considered.</i></p>	
<a href="#">43.37</a>	SASM – Sites and areas of significance to Maori	Policies	SASM-P5 Identification of sites and areas of	<i>Retain as proposed or preserve the original intent.</i>	
<a href="#">119.12</a>	SASM – Sites and areas of significance to Maori	Policies	SASM-P5 Identification of sites and areas of	<i>Looking at the map provided there is no broad spatial SASM along the coast at Timaru city or along the waterways/current and historical wetlands through Timaru, this differs from the approach taken for rural property - why?</i>	
<a href="#">43.40</a>	SASM – Sites and areas of significance to Maori	Policies	SASM-P1 Involvement of Kāti Huirapa in resou	<i>Retain as proposed or preserve the original intent.</i>	



<a href="#">43.36</a>	SASM – Sites and areas of significance to Maori	Policies	SASM-P2 Consultation and engagement with Kāt	<p><i>Retain as proposed or preserve the original intent. [REDACTED] supports the encouragement of landowner engagement with Kati Huirapa.</i></p>	
<a href="#">71.16</a>	SASM – Sites and areas of significance to Maori	Policies	SASM-P2 Consultation and engagement with Kāti Huirapa	<p><i>This submission point relates to [REDACTED] - [REDACTED] being located within SASM-4. SASM-4, in which [REDACTED] Te Muka is located, is described in Schedule 7 as an:</i></p> <p><i>Area of former extensive swamplands and hapua, significant for mahika kai, including as breeding grounds for mahika kai species. Values include ara tawhito, mara kai, mahika kai, ongoa, wai puna, kaika and wahi pakanga. A number of Maori Reserves were granted in this area for mahinga kai and settlement purposes as part of Kemp’s Purchase Deed in 1848 (including Arowhenua and Waipopo Reserves). Awarua Reserve also recognises urupa at Arowhenua. The Opihi Mataitai established under the Fisheries ([REDACTED]) Regulations 1999 recognises the importance of waterways in the area for customary fishing. The marae tipuna of Kati Huirapa is situated at Arowhenua.</i></p> <p><i>There is a disconnect between how SASM-4 is described, in terms of its value to Maori and the general encouragement in SASM-P2 for consultation as being the most appropriate way to obtain understanding of the potential impact of any activity on the site or area (our emphasis).</i></p> <p><i>Amend the description for SASM4 to provide more clarity regarding the specific values of the area, including definitions for all values.</i></p> <p><i>Amend the policy and rule framework so that it is appropriately tied into the values of the site or area that has been recognised. It should, for example, be very clear what values are to be maintained, enhanced and/or protected, so that a reasonable and informed decision can be made as to not only the extent to which consultation is considered necessary, but also to what extent the outcome of any consultation is necessary and appropriate.</i></p> <p><i>Provide contact details to help facilitate consultation with Kati Huirapa.</i></p>	
<a href="#">71.18</a>	SASM – Sites and	Policies	SASM-P8 Protectio	<p><i>This submission point relates to [REDACTED] - [REDACTED] being located within SASM-4.</i></p>	

	areas of significance to Maori		n of wāhi taoka, wāhi tapu, wai taoka and wai tapu sites and areas	<p><i>Policy SASM-P8 seeks to ensure that there is engagement with Te Runaka o Arowhenua to understand the effects of the activity on the identified values of the site or area. SCHED7A lists the Wahi tupuna areas and sets out the associated values, but the description of SASM4 (which affects [REDACTED]) doesn't appear to set out the values in sufficient detail to assist in understanding for plan users and to support meaningful consultation.</i></p> <p><i>Amend the policy and rule framework so that it is appropriately tied into the values of the site or area that has been recognised. It should, for example, be very clear what values are to be maintained, enhanced and/or protected, so that a reasonable and informed decision can be made as to not only the extent to which consultation is considered necessary, but also to what extent the outcome of any consultation is necessary and appropriate.</i></p>	
<a href="#">119.11</a>	SASM – Sites and areas of significance to Maori	Policies	SASM-P8 Protection of wāhi taoka, wāhi tapu,	<p><i>Rather than engagement (SASM-P8 1.), the plan could be changed to supporting landowners through education, this would better enable the plan objectives and create a more collective management and appreciation of cultural values. Showing land owners and farmers why it is important to Maori and land owners can show how it is being protected.</i></p>	
<a href="#">66.2</a>	SASM – Sites and areas of significance to Maori	Policies	General	<p><i>While [REDACTED] supports the objectives noted, the policies and rules to enable and/or meet these objectives will significantly affect existing activities, and may not best enable the outcomes sought.</i></p> <p><i>The policies (SASM-P1 to P8) could potentially be broadened to include supporting landowners/occupiers in enabling the objectives. For example, supporting landowners and/or occupiers in being aware of, and having an understanding of cultural values, and how they may be protected and managed. This may better aid in enabling the stated objectives.</i></p>	
<a href="#">119.7</a>	SASM – Sites and areas of significance to Maori	Rules		<p><i>As examples of the extent (spatial and activities) of the draft rules, the rule for earthworks (SASM-R1) would require resource consent for earthworks in the Wahi taoka, wahi tapu, wai taoka, wai tapu overlays, and within the Wahi tupuna overlay where the performance standards are not met. As the rule currently stands, excavation to repair a water line would require a resource consent, being impractical.</i></p> <p><i>Similarly, the draft rule for Buildings and Structures (SASM-R2) would require resource consent for all buildings and structures (including additions and alterations to existing buildings and</i></p>	

				<p><i>structures and network utilities) in the Wahi tapu, wai taoka, and wai tapu overlays, and within the Wahi taoka overlay where the performance standards are not met.</i></p> <p><i>It is suggested that the areas where earthworks or structures are required to be controlled to meet the stated objectives, and may require resource consent, are revised to capture specifically identified sites or areas (which may be interconnected), and activities within those areas and sites which require such controls.</i></p> <p><i>Under rule SASM-R7, intensively farmed stock as defined in the plan within the Wahi taoka, wahi tapu, wai taoka and wai tapu areas would be a non-complying activity. Intensively farmed stock as defined includes cattle grazed on irrigated land, and dairy cattle on any land and winter break fed crops.</i></p> <p><i>We understand that this was not intended by this rule. The rule needs to be revised to reflect this, so that current practice is allowed to continue, unless there are specific sites which require other controls. The rule as currently drafted would be inconsistent with the stated objectives and purpose of the general rural zone.</i></p> <p><i>It is suggested that the draft rules are reviewed as to what is sought to be controlled, what may require resource consent, where, and why. A requirement to obtain a resource consent, and the resource consent process, may not in itself be the best way to achieve the objectives sought. Consenting also raises capacity, capability, time and cost issues for both potential applicants, the runanga, and the council.</i></p>	
<a href="#">38.9</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R5 Plantation forestry Wahi tao	<p><i>Issue</i></p> <p><i>SASM-R5 determines that all plantation forestry is a non-complying activity in Wai Taoka areas. If you review historical aerial imagery on the Canterbury Maps website you will see that it was quite common to have small areas of forestry in this area south of the Rangitata River. We do not understand why something that has been normal farming practice for many years is now a non-complying activity.</i></p> <p><i>Outcome We Seek</i></p>	

				<p><i>Again, we seek to understand the issue that is being addressed here. The proposals further limit options for future land use for owners especially in times when forestry is considered a good measure in mitigating the effects of climate change. We ask that TDC reconsider the restricted discretionary activity and consider making plantation forestry a permitted activity with appropriate standards.</i></p>	
<a href="#">68.41</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R5 Plantation forestry Wahi tao	<p><i>Is it the intention of the rule to include or exclude plantations of native forestry as a non-complying activity?</i></p>	
<a href="#">131.9</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R5 Plantation forestry Wahi tao	<p><i>SASM-R5: Under this current provision plantation forestry is a non-complying activity in Wai Toaka areas. This is in contrast to practices which have been occurring in this area over many years, where it is quite common to see small areas of forestry within the SASM 23 area. We ask the TDC to explain their reasoning for this rule, where it seems to exclude this future land use option to current owners, when there is an active push for forestry by the NZ government as a means to address climate change. This land use may indeed prove a more viable option for this area particularly given the current perceived environmental pressures associated with dairy farming. Does your definition of Plantation forestry include non-exotic species? We ask the TDC to revise plantation forestry to a permitted activity under appropriate standards.</i></p>	<p>We ask the TDC to explain their reasoning for this rule, where it seems to exclude this future land use option to current owners, when there is an active push for forestry by the NZ government as a means to address climate change.</p> <p>We ask the TDC to revise plantation forestry to a permitted activity under appropriate standards.</p>
<a href="#">38.10</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R7 Mining and quarrying activities and	<p><i>Issue</i></p> <p><i>SASM-R7 determines that intensively farmed stock in any Wai Taoka area (amongst others) would be a non-complying activity. Based on the current definition of intensively farmed stock in the Draft District Plan this is the most concerning rule in the entire plan for us. This will seriously affect our ability to make decisions on future land use and may even undermine our current farming operation depending on the application of the “existing land use” provisions in the RMA as previously covered.</i></p>	

				<p><i>Outcome We Seek</i></p> <p><i>We ask TDC to redefine intensive farming (as previously addressed in this feedback) to ensure what is normal farming practice currently in this area is a permitted activity.</i></p>		
<a href="#">131.10</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R7 Mining and quarrying activities and	<p><i>SASM- R7: Deems ‘intensively farmed’ stock a non-complying activity within any Wai Toaka area. Based on the current definition, this will have a detrimental effect on many landowners within this area and will personally undermine our entire farming operation, and limit our options as a business going forward, as we have outlined earlier. We ask the TDC to re-define ‘Intensive Farming’ as it currently applies to this draft plan to include what currently is normal farming practice in the area (and has been for the past 15 years).</i></p> <p><i>We believe there is an overall need for TDC along with local runanga and land owners to collectively discuss these issues, before they get to draft plan stage. This will enable more of an understanding from each party’s perspective, as to what specific areas, value and objectives are attempting to be addressed. This may lead to a more practical outcome in possible management of these specific cultural issues by landowners, if there is more of an understanding of what objectives are sought initially.</i></p> <p><i>In many cases we believe that the requirement to obtain resource consent and the process involved in this may not be the best way to achieve these objectives, particularly where resource consents obtained in the past have been through a similar cultural assessment process and have not flagged any areas of significance or cultural concerns. We also believe there needs to be more cohesion between district and regional Council rules, and that there are too many unnecessary over-lapping and contrasting layers, for rural landowners to negotiate. Unnecessary consenting and administration also raises time and cost issues for all parties concerned.</i></p>		We ask the TDC to re-define ‘Intensive Farming’ as it currently applies to this draft plan to include what currently is normal farming practice in the area (and has been for the past 15 years).
<a href="#">141.11</a> <a href="#">3</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R7 Mining and quarrying activities and	<p><b>SASM-R7 – Mining and quarrying activities and intensively farmed stock</b></p> <p>In Wāhi taoka, wāhi tapu, wai taoka, and wai tapu overlays</p>	<p>Oppose in part</p> <p>██████ is concerned with the potential implications of this rule in regard to ‘intensively farmed stock’, which would be a non-complying activity.</p>	Reconsider across the Plan the definition of intensively farmed stock and the proposed management of this activity in the District.

				<p>██████ concerns with the definition of 'intensively farmed stock' are explained elsewhere.</p> <p>The relevance to horticulture is that some growers operate as mixed farm systems, or include animals as part of their crop rotation.</p>	
<a href="#">66.6</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R7 Mining and quarrying activities and intensively farmed stock	<p><i>Under rule SASM-R7, intensively farmed stock as defined in the plan within the Wahi taoka, wahi tapu, wai taoka and wai tapu areas would be a non-complying activity. Intensively farmed stock as defined includes cattle grazed on irrigated land, and dairy cattle on any land.</i></p> <p><i>We understand that this was not intended by this rule. The rule needs to be revised to reflect this, so that current practice is allowed to continue, unless there are specific sites which require other controls. The rule as currently drafted would be inconsistent with the stated objectives and purpose of the general rural zone.</i></p>	
<a href="#">43.39</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R7 Mining and quarrying activities and	<p><i>Consider whether an exception should be granted for gravel extractions where these are consented or permitted by Canterbury Regional Council.</i></p> <p><i>Gravel extraction activities fall within the definition of quarrying activities and would be captured by this rule, but that may not be the intent.</i></p>	
<a href="#">91.8</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R7 Mining and quarrying activities and	<ol style="list-style-type: none"> <li>1. ██████ is very concerned that this proposed rule makes dairy farming within the wai taoka overlay a non-complying activity.</li> <li>2. While ██████ recognises the concern that intensively farmed stock and mining can adversely impact cultural values, as noted above, the ██████ property (for example) is already highly modified and includes intensively farmed stock and some farm quarrying activities that were lawfully established.</li> <li>3. Adverse effects of such activities, such as discharges to groundwater, are appropriately managed (and restricted) by the Regional Council through the LWRP, National Policy Statement for Freshwater Management-2020 (NPSFM), and National Environment Standard for Freshwater Management (NES). This framework considers and provides for</li> </ol>	

				<p>cultural values and [REDACTED] questions whether it is also necessary for the District Plan to ‘step’ into this area. As mentioned above, [REDACTED] is concerned to avoid unnecessary consenting requirements.</p> <ol style="list-style-type: none"> <li>4. In other words, as a District Plan (and consistent with the functions of a District Council through section 31 of the RMA), it is [REDACTED] view that care needs to be taken to ensure the District Plan does not ‘over reach’ in terms of its coverage.</li> <li>5. [REDACTED] considers that the extent of restrictions over areas such as [REDACTED] are disproportionate to the cultural values of the [REDACTED] farm that this overlay seeks to protect. A non-complying activity status signals that these types of activities are not generally accessible in a particular location; that is not a rational conclusion where the overlay applies to areas where these exact activities have been occurring for quite some time.</li> <li>6. It is important that the Draft Plan promotes the sustainable management of natural and physical resources. Farming is a long-established activity that provides a significant contribution to the Timaru District and it is important that it continues to be enabled (while, at the same time, recognising and providing for cultural values).</li> <li>7. Additionally, under the proposed definition of “intensively farmed stock” a single dairy cow could be captured by the rule, regardless of whether it is a milking cow or not.</li> <li>8. [REDACTED] also notes that almost all of the land within SASM-23 is already irrigated farmland, most of which farms cattle. [REDACTED] considers there is very little additional benefit in making dairy farming non-complying within this overlay.</li> <li>9. Finally, [REDACTED] is concerned that this rule will prevent it from undertaking minor farm quarrying activities which are necessary for the operation and maintenance of its farm.</li> <li>10. Overall, [REDACTED] considers that the overlay should only apply to the boundary of existing intensively farmed land. If this is not forthcoming, dairy farm operations should be excluded from the rules, or at the very least should be subject to a much lesser activity status – that is, controlled, with matters of control limited to cultural values.</li> </ol>	
<a href="#">99.17</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R7 Mining and quarrying activities and	<p>[REDACTED] position is:</p> <p><i>Oppose in part</i></p> <p><i>Comments relating to feedback</i></p> <p>[REDACTED] does not support non-complying status in relation to intensively farmed stock within SASM23 (a wai taoka overlay). The overlay includes within it, farmland that has been farmed,</p>	

				<p><i>including intensively, for a long time. Such use includes break feeding activities or dairy support grazing which can change location from season to season.</i></p> <p><i>Non-complying status will make it difficult for farms to diversify their operation, or to make any changes to their current use. To do so, they would be required to obtain resource consent from Council on a non-complying basis, even where such diversification can satisfy the nitrogen loss requirements in the LWRP and NES for Freshwater. This could prove difficult, given that non-complying activities are subject to the highest degree of scrutiny out of all the activity classes under the RMA.</i></p> <p><i>Feedback on the provisions</i></p> <p><i>Amend SASM-R7 to the effect of providing a restricted discretionary activity rule for intensively farmed stock within wai taoka overlays (or in the alternative, for the SASM23 overlay only).</i></p>			
<a href="#">129.8</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R7 Mining and quarrying activities and	<p><i>Rule SASM-R7 – This rule makes mining and quarrying activities a Non-complying activity within the wahi taoka, wai taoka, wahi tapu and wai tapu overlay areas. These areas are extensive, and cover sites where resource consent for quarrying is already held. The control will also impose a significant barrier to future gravel extraction from riverbed areas (irrespective of the multiple benefits that this may provide). In both cases, the rule is considered to be overly-restrictive, unjustified, and involves substantial duplication with regional rules.</i></p>	Relief sought – remove all existing consented quarries from within the overlay areas (for example, [REDACTED] Quarry, [REDACTED] Provide an exemption from Rule SASM-R7 for quarrying activities that require resource consent from the Canterbury Regional Council (including land and fluvial-based quarrying).		
<a href="#">49.92</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R1 Earthworks	<table border="1"> <tr> <td>Query</td> <td>It's a little loose using the term 'likely' : 'Limited notification of Te Runanga o Arowhenua is likely to be determined where this rule is not met'. [REDACTED] feel clarity is required so going forward everyone, including planners and applicants, will understand the requirement. The rule as</td> </tr> </table>	Query	It's a little loose using the term 'likely' : 'Limited notification of Te Runanga o Arowhenua is likely to be determined where this rule is not met'. [REDACTED] feel clarity is required so going forward everyone, including planners and applicants, will understand the requirement. The rule as	
Query	It's a little loose using the term 'likely' : 'Limited notification of Te Runanga o Arowhenua is likely to be determined where this rule is not met'. [REDACTED] feel clarity is required so going forward everyone, including planners and applicants, will understand the requirement. The rule as						



					drafted does not give certainty that matters will be addressed in an appropriate way.	
<a href="#">49.172</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R1 Earthworks	Query	It's a little loose using the term 'likely' : 'Limited notification of Te Runanga o Arowhenua is likely to be determined where this rule is not met'. █████ feel clarity is required so going forward everyone, including planners and applicants, will understand the requirement. The rule as drafted does not give certainty that matters will be addressed in an appropriate way.	
<a href="#">141.108</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R1 Earthworks Wahi tupuna overl	<p><b>SASM-R1 Earthworks</b></p> <p>Wāhi tūpuna overlay</p>	<p>Support in part</p> <p>Earthworks are managed by SASM-R1 as a permitted activity where the conditions are met.</p> <p>This includes earthworks associated with new buildings/structures (up to 750m2) and for maintenance of existing roads or tracks – provided an Accidental Discovery Protocol commitment form is provided to Council.</p> <p>█████ considers that it would efficient and effective approach to include a specific permitted activity condition enabling ancillary rural earthworks (discussed further in comments on earthworks below).</p>	<p>Consider including a permitted activity rule or condition for ancillary rural earthworks.</p> <p>For example;</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>.....</p> <p>PER-1 ...; or</p> <p>PER-2 ...; and/or</p> <p>PER-3</p> <p>The earthworks are ancillary rural earthworks.</p>
<a href="#">38.7</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R1 Earthworks Wahi tupuna overl	<p><i>Issue</i></p> <p><i>SASM-R1 determines earthworks to be a restricted discretionary activity in Wai Taoka areas and therefore requiring a consent. As discussed at length in our meeting this poses an over burden of</i></p>		

				<p><i>regulation on land owners following a flood event or other natural disaster when essential remedial earthworks are required.</i></p> <p><i>Outcome We Seek</i></p> <p><i>We would like to see any remedial works, where pasture, tracks, lanes and any general earthworks are required to return the land to its previous state (or close to it) which enables the farming operation to continue as it was before specifically exempted from this rule and a set of guidelines to follow be developed instead.</i></p>	
<a href="#">66.4</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R1 Earthworks	<p><i>As an example of the extent (spatial and activities) of the draft rules, the rule for earthworks (SASM-R1) would require resource consent for earthworks in the Wahi taoka, wahi tapu, wai taoka, wai tapu overlays, and within the Wahi tupuna overlay where the performance standards are not met. As the rule currently stands, excavation to repair a water line would require a resource consent.</i></p> <p><i>It is suggested that the areas where earthworks or structures are required to be controlled to meet the stated objectives, and may require resource consent, are revised to capture specifically identified sites or areas (which may be interconnected), and activities within those areas and sites which require such controls.</i></p>	
<a href="#">43.44</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R1 Earthworks Wāhi tupuna overl	<p><i>Amend as follows:</i></p> <p><i>PER-2</i></p> <p><i>The earthworks are for the purpose of maintaining existing roads, or tracks, or hazard mitigation works within the footprint or modified ground comprised by the existing road, or track, or hazard mitigation work; and</i></p>	
<a href="#">91.6</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R1 Earthworks Wāhi tupuna overl	<p><i>Wāhi tapu, wai taoka, and wai tapu overlays</i></p> <p>1. <i>█████ is very concerned that any earthworks on its █████ property would be ‘restricted discretionary’ due to being in the proposed wai taoka overlay. This will create</i></p>	

				<p><i>unnecessary consenting requirements disproportionate to the environmental effects that this requirement seeks to manage.</i></p> <ol style="list-style-type: none"> <li>2. <i>Again, [REDACTED] has 22,800m2 of lanes to maintain and it is impractical and extremely burdensome to have to obtain consent each time [REDACTED] needs to undertake maintenance works on its lanes, which is important for (for example) reducing incidences of lameness, ensuring drainage is effective and avoiding unnecessary wear and tear on machinery and motorbikes.</i></li> <li>3. <i>Other land improvement works as discussed above in relation to the natural hazards chapter would also be unnecessarily expensive and burdensome under this proposed rule.</i></li> </ol>	
<a href="#">99.13</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R1 Earthworks Wāhi tupuna overl	<p><i>Wāhi tupuna overlay (excluding the Māori purpose zone):</i></p> <p><i>[REDACTED] position is:</i></p> <p><i>Support in part</i></p> <p><i>Oppose in part</i></p> <p><i>Comments relating to feedback</i></p> <p><i>[REDACTED] supports the ability to undertake earthworks in a Wahi tupuna area where the earthworks are for the purpose of maintaining existing roads or tracks, within the footprint or modified ground comprised by the existing road or track.</i></p> <p><i>There is a sizeable discrepancy between the permitted activity levels in the GRUZ as compared to within the wahi tupuna (SASM-5) overlay (2,000m2 compared to 750m2). [REDACTED] considers the permitted activity maximum for earthworks should be increased within the wahi tupuna overlay.</i></p> <p><i>[REDACTED] requests there be a maximum area of earthworks permitted in the wai taoka overlay. In particular, [REDACTED] considers farms in the SASM23 overlay should be able to continue to maintain and repair existing tracks, and undertake a modest amount of earthworks without requiring resource consent as a restricted discretionary activity. The effects of these activities are already</i></p>	

			<p><i>in place and maintenance and repair should not increase or exceed that level of effects to an extent that requires Council control.</i></p> <p><i>These permitted activity levels should still be required to abide by the discovery protocol in SASM-PER3, however.</i></p> <p><i>Feedback on the provisions</i></p> <p><i>Retain SASM-R1 PER-2 as notified.</i></p> <p><i>Amend SASM-R1 to increase the maximum area of permitted earthworks. For example:</i></p> <p><i>PER-1</i></p> <p><i>The earthworks, including those associated with and under new buildings/structures and those necessary for the installation of infrastructure / utilities, do not exceed a maximum area of 750 1,500m<sup>2</sup>; or</i></p> <p><i>Amend SASM-R1 to the effect of providing:</i></p> <ul style="list-style-type: none"><li><i>• Providing a permitted activity rule for all earthworks in the wai taoka overlays (or in the alternative, specifically the SASM23 overlay) that do not exceed a certain square meterage; and</i></li><li><i>• A permitted activity rule for any earthworks for the purpose of maintaining existing roads or tracks, within the footprint or modified ground comprised by the existing road or track..</i></li></ul> <p><i>For example:</i></p> <p><i>Wai taoka overlays</i></p> <p><i>PER-4</i></p>	
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				<p><i>The earthworks, including those associated with and under new buildings/structures and those necessary for the installation of infrastructure / utilities, do not exceed a maximum area of XXXm2</i></p> <p><i>PER-5</i></p> <p><i>earthworks for the purpose of maintaining existing roads or tracks, within the footprint or modified ground comprised by the existing road or track;</i></p> <p><i>PER-6</i></p> <p><i>The Accidental Discovery Protocol commitment form, contained within APP3 - Form confirming a commitment to adhering to an Accidental Discovery Protocol, has been completed and submitted to Council, at least 2 weeks prior to the commencement of any earthworks.</i></p>	
<a href="#">99.14</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R1 Earthworks Wāhi tupuna overl	<p><i>Wāhi taoka, wāhi tapu, wai taoka, and wai tapu overlays:</i></p> <p>██████ <i>position is:</i></p> <p><i>Oppose in part</i></p> <p><i>Comments relating to feedback</i></p> <p>██████ <i>requests there be a maximum area of earthworks permitted in the wai taoka overlay. In particular, ██████ considers farms in the SASM23 overlay should be able to continue to maintain and repair existing tracks, and undertake a modest amount of earthworks without requiring resource consent as a restricted discretionary activity. The effects of these activities are already in place and maintenance and repair should not increase or exceed that level of effects to an extent that requires Council control.</i></p> <p><i>These permitted activity levels should still be required to abide by the discovery protocol in SASM-PER3, however.</i></p> <p><i>Feedback on the provisions</i></p>	

				<p><i>Amend SASM-R1 RDIS-1 to provide for the changes requested to SASM-R1 previously, namely:</i></p> <ul style="list-style-type: none"> <li><i>Providing a permitted activity rule for all earthworks in the wai taaka overlays (or in the alternative, specifically the SASM23 overlay) that do not exceed a certain square meterage; and</i></li> <li><i>Providing a permitted activity rule for any earthworks for the purpose of maintaining existing roads or tracks, within the footprint or modified ground comprised by the existing road or track.</i></li> </ul>	
<a href="#">129.5</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R1 Earthworks Wāhi tupuna overl	<p><i>The DDP places reliance on a commitment to adhere to an Accidental Discovery Protocol (ADP) within the rules regime (see, for example, rule SASM-R1, Per-3). It is suggested that this approach could be streamlined by including the ADP as a stand-alone rule that requires compliance for all/any activities to be Permitted. This method would be consistent with the purpose and principles of the Heritage New Zealand Pouhere Taonga Act 2014.</i></p>	The relief sought is that the requirement for compliance with an ADP is incorporated into the DDP as a stand-alone Permitted Activity Rule. This should include the ADP in toto as the Permitted Activity threshold.
<a href="#">71.19</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R1 Earthworks	<p><i>This submission point relates to ████████ - ████████ being located within SASM-4.</i></p> <p><i>The link between the rules and the effects of an activity need to be established. In PER-1, for example, is the 750m2 limit calculated on a staged basis or across the site. Does it apply over a 12-month period or the life of the plan? Does it make a difference if the earthworks are 50mm deep vs 5m deep?</i></p> <p><i>Amend the rule framework, including PER-1, so that it is appropriately tied into the values of the site or area that has been recognised. It should, for example, be very clear what values are to be maintained, enhanced and/or protected, so that a reasonable and informed decision can be made as to not only the extent to which consultation is considered necessary, but also to what extent the outcome of any consultation is necessary and appropriate.</i></p>	
<a href="#">131.7</a>	SASM – Sites and areas of	Rules	SASM-R1 Earthworks Wahi	<p><i>SASM-R1: under this rule earthworks are deemed a restricted discretionary activity within Wai Toaka areas thus requiring a consent, which poses an excessive burden on land owners following</i></p>	We ask this rule should be revised to specifically exclude any earthworks necessary to enable the continuation of

	significance to Maori		taoka, wahi	<p><i>a natural disaster where immediate remedial earthworks are essential for human or animal welfare situations, or for the immediate continuance of the day to day farming operation.</i></p> <p><i>We ask this rule should be revised to specifically exclude any earthworks necessary to enable the continuation of the farming operation as it was before the natural disaster occurred (eg: pasture, tracks, bridges, irrigation crossings, lanes and general earthworks).</i></p>			the farming operation as it was before the natural disaster occurred (eg: pasture, tracks, bridges, irrigation crossings, lanes and general earthworks).
<a href="#">141.109</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R1 Earthworks Wahi taoka, wahi	Wāhi taoka, wāhi tapu, wai taoka, and wai tapu overlays	Support in part	As above, █████ considers that in some of these areas it could be appropriate to enable ancillary rural earthworks.	Consider including a permitted activity rule or condition for ancillary rural earthworks.
<a href="#">49.38</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R3 Indigenous vegetation clearance	Query		█████ considers salvage of significant cultural resources when indigenous vegetation is cleared is an option and would seek the view of Runaka to comment on this option.	
<a href="#">49.141</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R3 Indigenous vegetation clearance	Query		█████ considers salvage of significant cultural resources when indigenous vegetation is cleared is an option and would seek the view of Runaka to comment on this option.	
<a href="#">141.112</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R3 Indigenous vegetation clearance	<p><b>SASM-R3 Indigenous vegetation clearance</b></p> <p>In Wāhi taoka, wāhi tapu, wai taoka, and wai tapu overlays</p>	Support in part	<p>█████ support the list of circumstances in which indigenous vegetation clearance in one of these areas/sites is a permitted activity (specifically the recognition of a biosecurity response).</p> <p>However, we consider there to be an anomaly in PER-5; █████ seeks that the reference to ‘for amenity purposes’ that precedes shelterbelt is removed, because the definition of shelterbelt indicates that</p>	<p>Amend PER-5 to remove reference to amenity purposes</p> <p>PER-5</p> <p>The indigenous vegetation has been planted and/or managed as part of a domestic or public garden or</p>

					<p>primarily these are to provide shelter. The basis for limiting this to shelterbelts for amenity purposes is unclear.</p> <p>██████ also seeks that PER 6 refer specifically to material infected by unwanted organisms as these are not necessarily considered to be 'pests' under a regional pest management strategy.</p>	<p>has been planted <a href="#">for amenity purposes</a> as a shelterbelt</p> <p>Amend PER 6 by adding after pest animals 'and removal of material infected by unwanted organisms'</p>
<a href="#">43.35</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R3 Indigenous vegetation clearance	<p><i>Add:</i></p> <p><i>PER-7</i></p> <p><i>The indigenous vegetation clearance is carried out solely by the Canterbury Regional Council or the Timaru District Council for the purpose of flood protection works.</i></p> <p><i>These sites, where they are in proximity to waterbodies, will be captured by the captured by the rules in the Ecosystems and Biodiversity Chapter (controlled activity), so an exception could be provided from this rule as consent would still be required for vegetation clearance in proximity to those waterways.</i></p>		
<a href="#">49.28</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R2 Buildings and structures, including	<p>Query</p> <p>It's a little loose using the term 'likely' : 'Limited notification of Te Runanga o Arowhenua is likely to be determined where this rule is not met'. ████████ feel clarity is required so going forward everyone, including planners and applicants, will understand the requirement. The rule as drafted does not give certainty that matters will be addressed in an appropriate way.</p>		
<a href="#">49.178</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R2 Buildings and structures, including	<p>Query</p> <p>It's a little loose using the term 'likely' : 'Limited notification of Te Runanga o Arowhenua is likely to be determined where this rule is not met'. ████████ feel clarity is required so going forward everyone, including planners and applicants, will understand the requirement. The rule as drafted does not give certainty that matters will be addressed in an appropriate way.</p>		



<a href="#">141.110</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R2 Buildings and structures, including	<p><b>SASM-R2 - Buildings and structures, including additions and alterations to existing buildings and structures and network utilities</b></p> <p>Wāhi taoka (PER)</p>	Support in part	Conditions PER-1 to PER-4 are generally supported, however ██████ seeks amendment to include provisions specific to structures in the rural environment which are associated with horticultural activity – including artificial crop protection structures – which may otherwise trigger consent under this rule (due to the footprint of restriction of 300m <sup>2</sup> )	Consider including permitted activity conditions that specifically apply to artificial crop protection structures, or exempting these structures from PER-4.
<a href="#">38.8</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R2 Buildings and structures, including	<p><i>Issue</i></p> <p><i>SASM-R2 includes restrictions on buildings on Wai Taoka areas. We are specifically concerned at PER-1 and PER-4 and ask what issue TDC is trying to address here? We see these standards as overly restrictive and as they stand would not allow us to build any building without a resource consent. Under the current definition of a building this would also include our portable calf shelters that are moved around calf paddocks providing a solution to a potential animal welfare issue.</i></p> <p><i>Outcome We Seek</i></p> <p><i>We seek to understand the issue that this specific regulation is trying to address and ask that TDC reconsider the restricted discretionary activity and consider making buildings and structures a permitted activity with appropriate standards.</i></p>			
<a href="#">66.5</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R2 Buildings and structures, including additions and alterations to existing	<p><i>Similar to the earthworks draft rule, the draft rule for Buildings and Structures (SASM-R2) would require resource consent for all buildings and structures (including additions and alterations to existing buildings and structures and network utilities) in the Wahi tapu, wai taoka, and wai tapu overlays, and within the Wahi taoka overlay where the performance standards are not met.</i></p> <p><i>It is suggested that the areas where earthworks or structures are required to be controlled to meet the stated objectives, and may require resource consent, are revised to capture specifically identified sites or areas (which may be interconnected), and activities within those areas and sites which require such controls.</i></p>			

			buildings and structures and network utilities		
<a href="#">91.7</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R2 Buildings and structures, including	<p><i>Wāhi tapu, wai taoka, and wai tapu overlays</i></p> <ol style="list-style-type: none"> <li>1. ■■■ considers that buildings and structures, including additions and alterations to existing buildings and structures, on existing farmland in the wai taoka overlay should be permitted - as they are in the in the wahi taoka overlay.</li> <li>2. ■■■ notes that farm buildings such as dairy sheds and hay sheds can be up to 15 metres tall, and considers it would be appropriate to increase the maximum height to 15 metres, consistent with the general rural zone chapter requirement. Similarly, the maximum footprint should be increased to 500m2 to accommodate reasonably contemplated farm buildings, such as a dairy shed or an addition to a hay shed.</li> </ol>	
<a href="#">99.15</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R2 Buildings and structures, including	<p><i>Wāhi taoka overlays:</i></p> <p>■■■ position is:</p> <p><i>Support in part</i></p> <p><i>Comments relating to feedback</i></p> <p><i>There is no activity status for buildings and structures, including additions to existing buildings and structures in the wahi tupuna overlay. To avoid any confusion between the controls in SASM-R2 and GRUZ-R2, this could be clarified by including a permitted activity rule for the wahi tupuna overlay in SASM-R2.</i></p>	

				<p><i>Feedback on the provisions</i></p> <p><i>Retain SASM-R2 PER-1, PER-2, PER-3 and PER-4 as drafted.</i></p> <p><i>Extend SASM-R2 to apply permitted activity status to wahi tapuna overlay areas also.</i></p>	
<a href="#">99.16</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R2 Buildings and structures, including	<p><i>Wāhi tapu, wai taoka, and wai tapu overlays:</i></p> <p>█████ <i>position is:</i></p> <p><i>Oppose in full</i></p> <p><i>Comments relating to feedback</i></p> <p>█████ <i>does not support the requirement to obtain a resource consent (on a restricted discretionary basis) for all buildings and structures, including additions to existing buildings and structures, in the SASM23 overlay (a wai taoka area).</i></p> <p><i>Feedback on the provisions</i></p> <p><i>Amend SASM-R2 to the effect of providing a permitted activity rule for all buildings and structures, including additions and alterations to existing buildings and structures and network utilities within the wai taoka overlays (or in the alternative, for the SASM23 overlay only), similar to GRUZ-R2.</i></p>	
<a href="#">131.8</a>	SASM – Sites and areas of significance to Maori	Rules	SASM-R2 Buildings and structures, including	<p><i>SASM-R2: Relates to restrictions around buildings in the Wai Toaka areas. Again we ask the TDC to please explain their reasoning's for this rule, and what issues are attempting to be addressed by the implementation of this provision? We believe this rule overly restrictive as, it will require landwoners to obtain resource consent for structures such as pumpsheds, and calf shelters. We ask TDC to re-vise this provision to a more reasonable workable one, which is not as restrictive.</i></p>	<p>We ask TDC to re-vise this provision to a more reasonable workable one, which is not as restrictive</p>



				<p>█████ would welcome an opportunity to meet with the Timaru District Council to discuss our comments and to have focused dialogue on the future planning framework as it affects our site at ██████████ in Timaru. This may include developing a Precinct for the site with a bespoke planning response.</p>	
<a href="#">100.12</a>	SASM – Sites and areas of significance to Maori	SASM-R1 Earthworks	General	<p>SASM-R1 wahi taoka, wahi tapu, wai taoka, and wai tapu overlays</p> <p><i>Oppose. Extremely large areas of land are captured including SASM7 Kakahu basin and foothills and SASM23 Rakitata River. All earthworks in this area are proposed as Restricted Discretionary which is excessive and inappropriate.</i></p>	
<a href="#">100.13</a>	SASM – Sites and areas of significance to Maori	SASM-R2 Buildings and structures, including additions and alterations to existing buildings and structures and network utilities	General	<p>SASM-R2 wahi tapu, wai taoka and wai tapu overlays</p> <p><i>Oppose. Extremely large areas of land are captured including ie SASM23 Rakitata River. All buildings and structures in this area are proposed as Restricted Discretionary which is excessive and inappropriate.</i></p> <p><i>No mention of wahi tupuna overlay in R2. It is also unclear why wahi taoka areas differ in their rules; permitted for buildings and structures, but restricted discretionary for earthworks.</i></p>	
<a href="#">100.14</a>	SASM – Sites and areas of significance to Maori	SASM-R3 Indigenous vegetation clearance	General	<p>SASM-R3 No mention of indigenous vegetation clearance in the Wahi tupuna overlay.</p>	
<a href="#">100.15</a>	SASM – Sites and areas of	SASM-R5 Plantation forestry	General	<p>SASM-R5 No mention of plantation forestry in the Wahi tupuna overlay.</p>	

	significance to Maori				
<a href="#">100.16</a>	SASM – Sites and areas of significance to Maori	SASM-R7 Mining and quarrying activities and intensively farmed stock	General	<p><i>SASM-R7: intensively farmed stock is non-complying, alongside mining and quarrying.</i></p> <p><i>“Intensively farmed stock” should be replaced with “intensive indoor primary production”. There is no mention of intensively farmed stock in the objectives and policies, but factory farming is. As per our comment in definitions this is an old term that has been replaced with intensive indoor primary production.</i></p> <p><i>No mention of mining and quarry and “intensive indoor primary production” the Wahi tupuna overlay.</i></p>	