

**In the Environment Court of New Zealand  
Christchurch Registry**

**I Te Koti Taiao O Aotearoa  
Te Whanganui-a-Tara**

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Under the Resource Management Act 1991 (the Act)

In the matter of an appeal under Clause 14(1) of the First Schedule of the Act

And in the matter of the decisions by the Timaru District Council in respect of the Proposed Timaru District Plan (proposed plan)

Between **New Zealand Transport Agency Waka Kotahi**  
Appellant

And **Timaru District Council**  
Respondent

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**Notice of appeal of New Zealand Transport Agency Waka Kotahi on the Proposed  
Timaru District Plan**

Dated 6 May 2026

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## Notice of appeal to Environment Court against decision on proposed plan

**To:** The Registrar  
Environment Court  
Wellington

1. New Zealand Transport Agency Waka Kotahi ('**NZTA**') appeals against the decisions of the Timaru District Council (the '**Respondent**') on the Proposed Timaru District Plan ('**Proposed Plan**').
2. NZTA made a submission (submission no. 143) and further submission (submission no.143) on the Proposed Plan.
3. NZTA is not a trade competitor for the purpose of section 308D of the Act.
4. NZTA received notice of the decision on 19 March 2026.
5. The decision was made by the Respondent.

### **Provisions being appealed**

6. The decisions that NZTA is appealing are the Respondent's decisions on the Proposed Plan that relate to noise effects on noise sensitive activities near to the state highway.
7. In particular, NZTA appeals the Respondent's decisions on the following provisions:
  - a. NOISE-R11; and
  - b. NOISE-S3; and
  - c. NOISE-S4.

### **General reasons for the appeal**

8. The general reasons for this appeal are that, in the absence of relief sought, the Respondent's decisions:
  - a. Will not promote the sustainable management of resources, and will therefore not achieve the purpose of the Act, including by not meeting the reasonably foreseeable needs of future generations;
  - b. Will not promote the efficient use of natural and physical resources;
  - c. Will not achieve the integrated management of the effects of the use, development or protection of land and associated natural and physical resources;
  - d. Will not assist NZTA in meeting its requirements under s96 of the Land Transport Management Act 2003, to exhibit a sense of social and environmental responsibility in meeting its objectives and undertaking its functions;
  - e. Do not represent the most appropriate way of exercising the Respondent's functions, having regard to the efficiency and effectiveness of other reasonably

practicable options, and are therefore not appropriate in terms of section 32 and other provisions of the Act;

- f. Do not adequately provide for the efficient function of the transport network as a significant physical resource, and therefore a matter of national importance under Part 2 of the Act; and
- g. Will not assist the Respondent in achieving Part 2 of the Act by providing for the use of natural and physical resources in a way which enables people and communities to provide for their health and safety (section 5(2)) and the maintenance and enhancement of amenity (section 7(c)).

### **Reasons for appeal of particular provisions**

9. Without limiting the generality of paragraph 8, the reasons of NZTA for appealing the noise provisions are:

- a. Although the decisions version of the Proposed Plan contains provisions to minimise adverse effects on people from noise related effects from state highways and the potential for reverse sensitivity effects, amendments are required to the provisions as set out in paragraph 7.a-c. The matters that NZTA is appealing are relatively limited, but the changes are essential to adequately address the noise effects on sensitive uses close to state highways. The key issues are, in summary:
  - i. The Proposed Plan does not provide for sufficient distance from the State Highway 1 ('SH1') that has a posted speed limit of 50km/h or greater where noise standards should apply. NOISE-R11 (previously NOISE-R9) sets a distance of 40m where the posted speed limit of the state highway is 50km/h or less, or an 80m distance where the posted speed limit is greater than 50km/h. While these distances are considered sufficient for State Highway 8, State Highway 78 and State Highway 79. However, it is not considered sufficient for SH1 which has a greater volume of annual average daily traffic and a higher percentage of heavy vehicles. Modelled noise contours were provided to the Respondent that demonstrated the need to increase this distance to 100m for SH1 where the posted speed limited is greater than 50km/h.
  - ii. In relation to NOISE-R11.PER-1.2, it requires that the acoustic insulation must be assessed in accordance with ISO 717-1:2020 Acoustics – Rating of sound insulation in buildings and of building elements – Part 1: Airborne sound insulation. It is considered that this assessment is meaningless in some instances and specific assessment should be undertaken to determine sufficient acoustic insulation. NZTA recommends that PER-1.2 is deleted.
  - iii. In relation to NOISE-R11.PER-2.a, NZTA does not support the reference to 'reasonable maximum use' and considers that a standard requirement for a 3dB margin based on measured/predicted noise levels in an assessment is clearer to determine sufficient acoustic relief. The reference to the 1.5m height above ground level should be replaced with reference to all parts of doors and windows. Additionally,

subclause ii. of this permitted standard refers to LAeq(1 hr) and should be replaced with LAeq(24 hr).

- iv. In relation to NOISE-R11.PER-2.b, it sets a distance of 20m from all roads and/or railway line subject to this standard where additional noise screening can be provided for as an alternative compliance pathway. NZTA does not support 20m distance and considers that a 50m distance is required. This compliance pathway with a 50m separation is used in numerous other districts with noise screening. This pathway avoids having to make site-specific assessment of internal noise. The exact outcome of noise screening is highly variable and is therefore designed to be slightly conservative to ensure effects are addressed.
- v. NOISE-S3 in the Proposed Plan should be amended to be consistent with the relief sought by NZTA as outlined in Paragraph 9.c.i, to require a distance of 100m for SH1 where the speed limit is greater than 50km/h.
- vi. NOISE-S3.1 was amended in the decisions version of the Proposed Plan to allow for an increase in floor area of a habitable room within an existing building where acoustic insulation is only required if the increase is 20% or more. NZTA does not support the percentage based increase in floor area as this is not equitable across different sized rooms, with larger existing rooms allowing a greater increase in floor area compared to smaller rooms before acoustic insulation is required. NZTA considers that a fixed increase of 5m<sup>2</sup> every 10 years is more equitable and is consistent with other district plans where there is a threshold.
- vii. NOISE-S3.1.b of the proposed plan should be consistent with the amendments sought to NOISE-R11 and as outlined in Paragraph 9.c.iii. This should include a requirement for a 3dB margin and refer to LAeq(24 hr).
- viii. NOISE-S3.2 sets out two pathways for acoustic insulation requirements to meet appropriate indoor noise standards. Subclause a. sets out a fixed sound insulation standards as outlined in Table 25, whereas subclause b. refers to a site specific acoustic assessment that is required to be undertaken by a suitably qualified acoustic engineer. The maintenance of these alternatives is overly complex and has known to cause implementation problems, as outlined in Christchurch City Council's Plan Change 5E, which sought the removal of the fixed sound insulation standard. NZTA recommends that this fixed sound insulation standard be removed from the Proposed Plan to improve clarity and implementation.
- ix. NOISE-S4.2 of the Proposed Plan does not currently provide for temperature controls. In the 'Final Decision – Hearings Panel Reports', Part 7 Decision Report for noise, it acknowledged in paragraph 405 that ventilation and temperature controls were important in the Timaru District, and it was noted that it was in the same temperature zone as Christchurch which experienced extremely hot summer days. However, the relief to include mechanical ventilation and cooling has

not been included. NZTA recommends amendments to include thermal comfort requirements by ensuring that temperatures do not exceed 25°C when windows are required to be closed.

## Relief sought

10. NZTA seeks the following relief:

- a. *Amendments to the specified provisions (and any related provisions) in order to address the reasons for the appeal set out in this notice are set out below (in red text and underline/trike out):*

*NOISE-R11 - Any new building for use by a noise sensitive activity and alterations to existing buildings for use by a noise sensitive activity (not listed in NOISE-R14).*

*Within 40m of a State Highway with a posted speed limit of 50km/hr or less*

*Within 80m of a State Highway, excluding State Highway 1, with a posted speed limit greater than 50 km/hr*

*Within 100m of State Highway 1, with a posted speed limit greater than 50 km/hr*

*Activity status: Permitted*

*Where:*

*PER-1*

*The building is acoustically insulated and ventilated in accordance with:*

1. *NOISE-S3 and NOISE-S4; and*
2. ~~*the acoustic insulation must be assessed in accordance with ISO 717-1:2020 Acoustics – Rating of sound insulation in buildings and of building elements – Part 1: Airborne sound insulation; or*~~

*PER-2*

*An acoustic design certificate signed by a suitably qualified acoustic engineer demonstrates either:*

- a. *the level of noise incident on the most exposed part of the exterior of any habitable room can be shown under a reasonable maximum use measured or predicted external noise levels with a 3 dB margin scenario ~~to that does not exceed the following noise limits at all points~~ 1.5m parts of doors and windows above ground level, and any part of the floor levels above ground:
  - i. *less than 55 dB LAeq(1h) for rail noise; or*
  - ii. *less than 57 dB LAeq(~~1~~24hr) for road noise; or*
  - iii. *less than 57 dB LAeq(1 hr) for port noise; or**
- b. *the building is at least 250m from all roads subject to the standard and/or the railway line and there is a solid building, fence, wall or landform that completely blocks the line-of-sight from all parts of all windows and doors to all parts of any road surface subject to the standard, or all points above 3.8m for railway track; or....*

*NOISE-S3 – Acoustic insulation*

1. *Within 40m of a State Highway with a posted speed limit of 50 km/hr or less*  
*Within 80m of a State Highway, excluding State Highway 1, with a posted speed limit greater than 50 km/hr*

Within 100m of State Highway 1, with a posted speed limit greater than 50 km/hr

1. Any habitable room in a new building used for a noise sensitive activity, or an alteration to an existing building or room that changes its use to a noise sensitive activity, or where the floor area of a habitable room within an existing building is increased ~~by 20% or more~~ 5m<sup>2</sup> or more in a 10 year period, must be designed, constructed and maintained to achieve:
  - a. a minimum external internal noise reduction for habitable rooms of not less than 35 dB Dtr,2m,nT,w + Ctr; or
  - b. Where in relation to a State Highway or railway line, internal design sound levels of 35dB LAeq(~~124hr~~) using measured or predicted external noise levels with a 3 dB margin.
2. Compliance with this standard must be achieved by ensuring habitable rooms are designed and constructed in a manner that accords with:
  - a. ~~Table 25 – Minimum construction requirements for external building elements of habitable rooms to achieve an advanced level of acoustic insulation; or~~
  - b. an acoustic design certificate signed by a suitably qualified acoustic engineer stating the design proposed will achieve compliance with this standard.

*NOISE-S4 – Ventilation requirements*

2. Ventilation systems where installed must:
  - a. generate sound levels not exceeding 35 dB LAeq(30s) when measure 1m away from any grille or diffuser; and
  - b. provide an adjustable airflow rate of up to at least six air changes per hour; and
  - c. include thermal comfort requirements by ensuring that temperatures do not exceed 25°C when windows are required to be closed.
- b. Such further or alternative relief, or ancillary changes, that resolve the concerns set out in this notice of appeal; and
- c. Costs.

11. The following documents are attached to this notice of appeal:

- a. Annexure A: A copy of the submission and further submission of NZTA on the Proposed Plan; and
- b. Annexure B: A list of names and addresses of persons to be served with this notice of appeal; and
- c. Annexure C: A copy of the relevant parts of the decision.

12. NZTA agrees to participate in mediation or other alternative dispute resolution mechanism.

**Dated** 5 May 2026



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Bridget Burt

Counsel for New Zealand Transport Agency Waka Kotahi

**Address for service of the Appellant:**

New Zealand Transport Agency Waka Kotahi  
44 Bowen Street  
Pipitea, Wellington 6011  
Private Bag 6995  
Wellington 6141  
New Zealand  
Email:  
Contact Person:

## **Advice to recipients of copy of notice of appeal**

### *How to become party to proceedings*

You may be a party to the appeal if you made a submission or a further submission on the matter of this appeal.

To become a party to the appeal, you must,

- within 15 working days after the period for lodging a notice of appeal ends, lodge a notice of your wish to be a party to the proceedings (in form 33) with the Environment Court and serve copies of your notice on the relevant local authority and the appellant; and
- within 20 working days after the period for lodging a notice of appeal ends, serve copies of your notice on all other parties.

Your right to be a party to the proceedings in the court may be limited by the trade competition provisions in section 274(1) and Part 11A of the Resource Management Act 1991.

You may apply to the Environment Court under section 281 of the Resource Management Act 1991 for a waiver of the above timing or service requirements (see form 38).

### *How to obtain copies of documents relating to appeal*

The copy of this notice served on you does not attach a copy of the part of the decision appealed. These documents may be obtained, on request, from the appellant.

### *Advice*

If you have any questions about this notice, contact the Environment Court in Auckland, Wellington, or Christchurch.

**Annexure A: NZTA Submission and Further Submission**

14 December 2022

**Form 5**  
**Waka Kotahi NZ Transport Agency Submission on the notified Proposed Timaru District Plan**  
**under Clause 6 of Schedule 1 of the Resource Management Act 1991**

To: Timaru District Council  
Via online submission tool

Name of Submitter: Waka Kotahi NZ Transport Agency  
PO Box 1479  
Christchurch 8011

Address for Service: Attention: Stuart Pearson  
Phone: (021) 052 5917  
Email: [stuart.pearson@nzta.govt.nz](mailto:stuart.pearson@nzta.govt.nz)

**This is a submission on the following plan:**

Proposed Timaru District Plan

**Introductory Comments:**

The provisions of the draft of Proposed Timaru District Plan have the potential to have a direct effect on the ability of Waka Kotahi to operate, maintain, and improve the road network. This submission focuses on ensuring that the Waka Kotahi state highway assets are adequately provided for in the draft provisions, that the approach to the transport issues in the Timaru District align with the Waka Kotahi strategic direction, and that Waka Kotahi delivers on the mandate from Central Government to promote best practice transport solutions across the country. We thank Timaru District Council for the opportunity to engage in this process.

**Waka Kotahi Statutory Functions, Powers and Responsibilities**

1. The Statutory objective of Waka Kotahi under the Land Transport Management Act 2003 (LTMA) is to undertake its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest.
2. Waka Kotahi must carry out its functions in a way that delivers the transport outcomes set by the Government which are provided in the Government Policy Statement on Land Transport 2021/22-2030/31 (GPS). It builds on the strategic direction set in the earlier GPS and has four strategic priorities: safety, better travel options, improving freight connections and climate change.
3. The 'Outcomes Framework' issued by the Ministry of Transport (MOT) defines the long-term strategic outcomes for New Zealand's transport system and explains how government and transport sector should work together toward these outcomes, being:
  - a. Inclusive Access
  - b. Economic Prosperity
  - c. Resilience and Security
  - d. Environmental Sustainability
  - e. Health and Safe People
4. Waka Kotahi supports planned development in appropriate areas and considers this should occur in a manner which does not compromise the effectiveness, efficiency, resilience and safety of the transport network. Therefore, Waka Kotahi seeks to participate in these proceedings to ensure that the plan change provisions do not adversely affect the transport network and contribute to improving environmental sustainability.
5. Overall, Waka Kotahi has an interest in the Proposed Timaru District Plan as a result of its role as a:

- a. Transport investor – to maximise effective, efficient and strategic returns for New Zealand;
  - b. Planner of land transport networks – to ensure the integration of infrastructure and land use to support liveable communities and the development of an effective and resilient land transport network for customers;
  - c. Provider of access to, and the use of, the land transport system – to shape smart, efficient, safe and responsible transport choices; and
  - d. Manager of the state highway network – to deliver efficient, safe and responsible highway solutions for customers.
6. Waka Kotahi **could not** gain an advantage in trade competition through this submission.
7. Waka Kotahi has reviewed the Proposed Timaru District Plan and has the following comments:

**The Waka Kotahi feedback:**

Matters have been identified through the review of the Proposed Timaru District Plan, which are either in support or are seeking relief in the form of amendments or clarity. The matters raised are summarised in Table 1, which forms the bulk of our feedback. Where a provision is not included in the appended table, Waka Kotahi supports the way it is drafted.

Our high level comments on the Proposed Timaru District Plan are as follows:

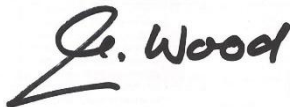
- Consistency between the Energy and Infrastructure Chapter and the Transport Chapter: there are many instances where there are exclusions for the regionally significant infrastructure when located in Significant Natural Areas (SNA), as they refer back to EI-P2. The state highway network is included in the definition of regionally significant infrastructure, but the Energy and Infrastructure Chapter states that transport matters are dealt with in the Transport Chapter. Therefore, the state highway does not get an equivalent exclusion when located in an SNA where it should be consistent. It is considered that amendments are made to either allow consideration of transport matters in the Energy and Infrastructure Chapter or provide for a separate exclusion for regionally significant infrastructure within the Transport Chapter.
- Alignment has been sought with Waka Kotahi NZ Transport Agency guidance when it relates to standards activities in or adjacent to the state highway network, for example transport, signage, and noise standards.

**The following decision is sought from the local authority:**

Amend the provisions of the Proposed Timaru District Plan as detailed in Table 1, including further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Waka Kotahi request to be heard in support of its submission. If others wish to make a similar submission, Waka Kotahi will consider presenting a joint case with them at a hearing.

Signature of person authorised to sign on behalf of Waka Kotahi:



Mike Wood  
Principal Planner – Poutiaki Taiao | Environmental Planning  
Waka Kotahi NZ Transport Agency

Table 1: Decisions Sought on the Proposed Timaru District Plan

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
<b>Part 1 – Introduction and General Provisions</b>				
<b>How the Plan Works</b>				
<b>Relationships between Spatial Layers</b>				
<b>Relationship between Spatial Layers</b>		Support	Waka Kotahi supports that the plan acknowledges that there can be conflict between area-specific spatial layers, and it clarifies this by recognising the hierarchy of provisions in Figure 5. However, an amendment is sought to the wording to indicate that higher ranking provisions have precedent rather than 'alters relevant provisions' as this provides clarity to plan users how the different spatial layers interact.	Amend as follows:  When there is a conflict between the provisions of different spatial layers, the following principles apply: <ul style="list-style-type: none"> <li>1. When there is a conflict between overlays, or between an overlay and an area-specific spatial layer, the most stringent provision applies;</li> <li>2. When there is a conflict between area-specific spatial layers, layers with a higher ranking in the below figure <del>alters</del> <u>have precedent over the</u> relevant provisions in the layers underneath it.</li> </ul>
<b>Interpretation</b>				
<b>Definitions</b>				
<b>Definitions</b>	Accessway	Support	Waka Kotahi supports the definition as worded.	Retain as notified.
	Active Transport	Support	Waka Kotahi supports the definition as worded.	Retain as notified.
	Available Reticulated Stormwater Network	Support	Waka Kotahi supports the definition as it outlines that reticulated stormwater networks must have acceptance of the stormwater from the network operator.	Retain as notified.

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
	Glare	Support	Waka Kotahi supports the definition as worded.	Retain as notified.
	Land Transport Infrastructure	Support	Waka Kotahi supports the definition as worded.	Retain as notified.
	Maintenance	Support	Waka Kotahi supports the definition as worded.	Retain as notified.
	Network Utility Operator	Support	Waka Kotahi supports the definition as worded.	Retain as notified.
	Noise Sensitive Activity	Support	Waka Kotahi supports the definition as worded.	Retain as notified.
	Official Sign	Support	Waka Kotahi supports the definition as worded.	Retain as notified.
	Off-Site Sign	Support	Waka Kotahi supports the definition as worded.	Retain as notified.
	Operational Need	Support	Waka Kotahi supports the definition as worded.	Retain as notified.
	Public Transport	Support	Waka Kotahi supports the definition as worded.	Retain as notified.
	Regionally Significant Infrastructure	Support	Waka Kotahi supports the definition as worded.	Retain as notified.
	Reverse Sensitivity	Support	Waka Kotahi supports the definition as worded.	Retain as notified.

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
	Road Boundary	Support	Waka Kotahi supports the definition as worded.	Retain as notified.
	State Highway	Support in part	Waka Kotahi supports the definition of State Highway from the Land Transport Management Act, however an amendment is sought to remove grammatical error 'in&nbspection 5'.	Amend as follows: <i>has the same meaning as <del>in&amp;nbspection</del> <b>in section 5</b> of the Land Transport Management Act 2003: ...</i>

**Part 2 – District Wide Matters**

**Strategic Direction**

**SD - Strategic Direction**

<b>Strategic Directions Objectives</b>	SD-08	Support	The proposed objective appropriately recognises the importance of infrastructure in the district, including the continued operation, maintenance and upgrading of said infrastructure.	Retained as notified.
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**UFD – Urban Form and Development**

<b>Urban Form and Development Objectives</b>	UFD-01	Oppose	While this objective seeks to achieve a consolidated and integrated settlement pattern; which Waka Kotahi supports, there is a contradiction between achieving this pattern and recognising the existing character of an area which is most likely to be low density residential development. As a result, Waka Kotahi seeks to remove the reference to the existing character and amenity. The objective seeks to achieve well designed good quality development that is attractive and functional which are important factors in achieving a consolidated and integrated settlement pattern.	Amend as follows: <i>"A consolidated and integrated settlement pattern that: ... v. is well designed, of a good quality, <del>recognises existing character and amenity</del> and is attractive and functional to residents, business and visitors."</i>
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**Energy, Infrastructure and Transport**

**EI – Energy and Infrastructure**

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
<b>General Comment</b>		Support in part	<p>The chapter provides for infrastructure and uses definitions that include the state highway network, but it states that transport related matters are dealt with in the Transport Chapter. There are many instances within the plan, such as in the Ecosystems and Biodiversity Chapter, that have an exclusion for Energy and Infrastructure activities to allow these to be permitted. As currently proposed, this would not provide for an equivalent exclusion for state highway infrastructure as regionally significant infrastructure.</p> <p>It is recommended that either transport infrastructure be considered under this chapter or an exclusion for transport infrastructure as regionally significant infrastructure that is equivalent to the exclusions used for activities under the Energy and Infrastructure chapter.</p>	<p>Amend the chapter to allow for consideration of transport infrastructure where appropriate,</p> <p>Or,</p> <p>amend other chapters to provide for an exclusion for transport infrastructure as regionally significant infrastructure where there are exclusions for activities in the Energy and Infrastructure chapter.</p>
<b>Energy and Infrastructure Objectives</b>	EI-O1	Support in part	<p>The intent of the objective is generally supported as it describes Regionally Significant Infrastructure and Lifeline Utilities. However, we are unsure whether the objective is providing for, or recognising, or giving effect to Regional Significant Infrastructure as it appears more of a description.</p> <p>In addition, it is recommended that the objective be clarified as to what is being sought by this objective.</p>	<p>Amend the objective to provide clarification, such as follows:</p> <p><i>Provide for Effective, resilient, efficient and safe Regionally Significant Infrastructure and Lifeline Utilities that:</i></p> <ol style="list-style-type: none"> <li>1. <i>provides essential and secure services, including in emergencies; and</i></li> <li>2. <i>facilitates local, regional, national or international connectivity; and</i></li> <li>3. <i>contributes to the economy and supports a high standard of living; and</i></li> <li>4. <i>is aligned and integrates with the timing and location of urban development; and</i></li> <li>5. <i>enables people and communities to provide for their health, safety and wellbeing.</i></li> </ol>

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
	EI-O2	Support	Waka Kotahi supports the objective as it provides for Regionally Significant Infrastructure where there is a functional or operational need and where adverse effects are avoided, remedied or mitigated.	Retain as notified.
	EI-O4	Support	Waka Kotahi supports this objective as it recognises that the efficient operation, maintenance, repair, upgrading or development of Regionally Significant Infrastructure and Lifeline Utilities should not be constrained or compromised by the adverse effects of subdivision, use and development, including reverse sensitivity.	Retain as notified.
<b>Energy and Infrastructure Policies</b>	EI-P1	Support	The policy is supported as it recognises the benefits of Regionally Significant Infrastructure and Lifeline Utilities by enabling the operation, maintenance, repair, upgrade and development of this infrastructure. It also recognises the functional or operational needs of this infrastructure.	Retain as notified.
	EI-P2	Support	The policy is supported as it provides Regionally Significant Infrastructure and other infrastructure where any adverse effects are appropriately managed, which includes avoiding adverse effects in areas with high natural importance. The policy also provides for the consideration of whether this infrastructure has a functional or operational need while having regard to other associated matters.	Retain as notified.
	EI-P3	Support	The policy is supported as it ensures new incompatible activities are appropriately located or designed to manage adverse effects on Regionally Significant Infrastructure and Lifeline Utilities.	Retain as notified.
<b>Energy and Infrastructure Rules</b>	EI-R22	Support in part	The rule is supported as it provides for a permitted pathway for the construction, maintenance, repair and upgrading of stormwater infrastructure when compliant with PER-1. However, it is considered that the matters of discretion for PER-1 should state whether there is a	Amend as follows:  <i>The functional needs <del>or</del> and operational needs of, and benefits from, the activity, including the potential impact on the levels of service or health and safety if the work is not undertaken.</i>

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			functional need or operational need, as these do not always occur together and as proposed it is inconsistent with EI-O2.	
	EI-R23	Support	Waka Kotahi supports that stormwater connections to reticulated networks are a permitted activity.	Retain as notified.
	EI-R24	Support	The rule is supported by Waka Kotahi is it provides for a permitted activity status for rainwater collection systems for non-potable use if PER-1 is achieved.	Retain as notified.
	EI-R25	Support in part	The rule is supported as it provides a permitted pathway for the maintenance, repair and upgrading of existing underground and above ground stormwater infrastructure, open drains and channels, pipes, water reservoirs, and storage ponds. However, it is considered that the matters of discretion in for PER-1 or PER-2 should state whether there is a functional need or operational need, as these do not always occur together and as proposed it is inconsistent with EI-O2.	Amend as follows:  <i>The functional needs <del>or</del> and operational needs of, and benefits from, the activity, including the potential impact on the levels of service or health and safety if the work is not undertaken.</i>
	EI-R26	Support in part	The rule is supported as it provides a permitted pathway for the construction of new underground and above ground stormwater infrastructure, open drains and channels, pipes, water reservoirs, and storage ponds in the rural zone. However, it is considered that the matters of discretion in for PER-1 and EI-R26.2 should state whether there is a functional need or operational need, as these do not always occur together and as proposed it is inconsistent with EI-O2.	Amend as follows:  <i>1. The functional needs <del>or</del> and operational needs of, and benefits from, the activity, including the potential impact on the levels of service or health and safety if the work is not undertaken.</i>
<b>SW – Stormwater Management</b>				
<b>Stormwater Management Policies</b>	SW-P2	Support in part	The policy requires that stormwater quality be maintained and enhanced, but it is not always possible to enhance the quality of stormwater. It is recommended that the policy be amended to state either maintain or enhance.	Amend as follows:  Maintain <del>or</del> enhance stormwater quality by requiring:

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
<b>Stormwater Management Rules</b>	SW-R1	Support	Waka Kotahi supports the rule as it requires all developments, other than a road, with specified areas of impervious surfaces to be captured and directed into the Council's reticulated stormwater network, which does not include the state highway stormwater network. The associated matters of discretion also allow for consideration of adverse effects of stormwater on a neighbouring road. The rule will ensure that runoff from adjoining development is appropriately managed and will not undermine Waka Kotahi regional consents for stormwater.	Retain as notified.
	SW-R2	Support	Waka Kotahi supports the rule as it requires all developments, other than a road, with specified areas of impervious surfaces to be captured and directed into the Council's reticulated stormwater network, which does not include the state highway stormwater network. The associated matters of discretion also allow for consideration of adverse effects of stormwater on a neighbouring road.	Retain as notified.
	SW-R3	Support	Waka Kotahi supports the rule as it requires all stormwater for non-residential activities that include impervious surfaces of 500m <sup>2</sup> or more for carparking to be captured and directed into the Council's reticulated stormwater network, which does not include the state highway stormwater network. The associated matters of discretion also allow for consideration of adverse effects of stormwater on a neighbouring road.	Retain as notified.
<b>TRAN - Transport</b>				
<b>Transport Objectives</b>	TRAN-O1	Support in part	The objective is supported as it identifies the outcomes for well-connected, integrated and accessible transport infrastructure, which aligns with the Waka Kotahi statutory functions. However, TRAN-O1.1 should be amended to reflect the Land Transport Management Act 2003 by replacing sustainable with effective.	Amend objective as follows: <i>Land transport infrastructure that is well-connected, integrated, and accessible, and which:</i> 1. <i>Is safe, efficient and <u>effective</u> <del>sustainable</del> for all transport modes;</i>

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
	TRAN-O2	Support	Waka Kotahi supports the objective to manage adverse effects on the environment from the use, construction, maintenance and development of land transport infrastructure to achieve the character and qualities of the underlying zone or overlay.	Retain as notified.
	TRAN-O3	Support	The objective is supported by Waka Kotahi as it recognises that land transport infrastructure should not be compromised by incompatible activities that may result in conflict or reverse sensitivity effects. The objective supports the ongoing operation of the state highway infrastructure while managing effects from adjacent use and development.	Retain as notified.
<b>Transport Policies</b>	TRAN-P1	Support	Waka Kotahi supports the policy as it encourages active modes of transport, such as cycling and walking. Matters have been identified in this policy to achieve this, which include safe pedestrian access, footpaths and other active transport infrastructure, consolidated settlement patterns, etc.	Retain as notified.
	TRAN-P2	Support	Waka Kotahi supports the policy as it supports the integrated public transport system in the region, which requires that new developments have convenient and safe walking links to public transport connections, and that urban development is consolidated and adjoining the existing towns and urban areas.	Retain as notified.
	TRAN-P3	Support in part	The policy is generally supported by Waka Kotahi as it enables the efficient use of existing land transport infrastructure by providing for its operation, maintenance and upgrading. However, it is recommended that the policy also enables the safe use of the land transport infrastructure as it is a key outcome for the transport network.	Amend as follows:  <i>Enable the <u>safe and</u> efficient use of the existing land transport infrastructure by providing for its operation, maintenance and upgrading.</i>
	TRAN-P4	Support in part	The intent of the policy is supported as it provides for new land infrastructure. However, there are instances where strategic land infrastructure, such as the state highway, has a functional and/or	Only allow land transport infrastructure:  <i>1. Within sensitive environments / overlays, where it can be demonstrated that:</i>

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			operational need to be located within sensitive environment / overlays. It is recommended that the policy be amended to reflect this.	<ul style="list-style-type: none"> <li>a. <i>There is a functional or operational need; or</i></li> <li>b. <i>The identified characters and values of the Overlay it is within will be protected; and</i></li> <li>c. <i>The relevant objectives for the Overlay will be achieved; and</i></li> </ul>
	TRAN-P5	Support	Waka Kotahi supports the policy that requires roads to be classified and built according to their anticipated function.	Retain as notified.
	TRAN-P6	Support	The policy is supported as it requires subdivision, use and development to support the safe and efficient operation of land transport infrastructure.	Retain as notified.
	TRAN-P7	Support	Waka Kotahi supports the policy as it requires consideration high traffic generating activities to ensure they support the safe, efficient and effective use of the land transport infrastructure and encourage a range of transport modes, such as public transport and active transport.	Retain as notified.
	TRAN-P8	Support	Waka Kotahi supports the policy for parking, loading and manoeuvring to be provided on site and that it maintains safety for pedestrians and cyclists.	Retain as notified.
	TRAN-P9	Support in part	Waka Kotahi supports that co-located network activities can be allowed within the road corridor. However, there is concern that non-transport related activities are encouraged if they can mitigate adverse effects and that are consistent with the character and qualities of the zone. It is not considered appropriate for non-transport related activities to be established within the state highway and this policy would encourage this.	<p>Amend the policy as follows:</p> <p><i>Encourage <u>the road (excluding any state highway)</u> and railway corridor to be used for:</i></p> <ul style="list-style-type: none"> <li>1. <i>Other co-located network utilities;</i></li> <li>2. <i>Non-transport related activities which contribute to public amenity values and well-being while:</i> <ul style="list-style-type: none"> <li>a. <i>Mitigating any adverse effects on the safety, efficiency and functionality of the transport corridor, including in the future; and</i></li> </ul> </li> </ul>

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
				<i>b. Being consistent with the character and qualities of adjoining zones.</i>
<b>Transport Rules</b>	TRAN-R1	Support	Waka Kotahi supports that maintenance of existing land transport infrastructure is a permitted activity.	Retain as notified.
	TRAN-R3	Support in part	The rule is generally supported, but it is recommended that the vehicle access way rule has a better link to the new vehicle crossings rules under TRAN-R4. A vehicle access way could be established where a vehicle crossing could not. The rule should require compliance with TRAN-S12, S14, S15, and S16, which should also be amended to reflect that they relate to vehicle access ways.	Amend the rule as follows: Activity status: Permitted Where: PER-1 TRAN-S9, TRAN-S10, <u>TRAN-S12</u> , TRAN-S14, TRAN-S15, TRAN-S16 and TRAN-S18 are complied with.
	TRAN-R4	Support	The rule and associated transport standards are supported, as they adequately provide for new vehicle crossings.	Retain as notified.
	TRAN-R5	Support	The rule and associated transport standards are supported, as they adequately provide for loading and manoeuvring areas for all new activities.	Retain as notified.
	TRAN-R8	Support	The rule and associated transport standards are supported, as they adequately provide for new private ways.	Retain as notified.
	TRAN-R9	Support in part	The rule is supported by Waka Kotahi as electric vehicle charging facilities are encouraged. It makes this type of infrastructure more accessible, which supports lower emission vehicles.	Retain as notified.
	TRAN-R10	Support	Waka Kotahi supports the rule for high trip generating activities along with the matters of discretion for both basic and full Integrated Traffic Assessments (ITAs). The use of ITAs are critical assessment tools to allow for the appropriate consideration of effects on the transport network;	Retain as notified.

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			including where upgrades or improvements are required for all modes of transport.	
<b>Transport Standards</b>	TRAN-S3	Support	Waka Kotahi supports the use of the AS/NZS 1158 Lighting for Roads and Public Spaces standard for street lighting, which is consistent with parts of the street lighting within the state highway network.	Retain as notified.
	TRAN-S5	Support	Waka Kotahi supports the inclusion of cycling parking provisions and the requirements identified, which are considered appropriate to encourage active transport.	Retain as notified.
	TRAN-S6	Support	Waka Kotahi supports the technical standards for cycle parking, which encourages active transport.	Retain as notified.
	TRAN-S10	Support	Waka Kotahi supports the vehicle access way requirements, which includes that any site with two road frontages requires access to be obtained from the secondary road frontage with the lower roading classification.	Retain as notified.
	TRAN-S12	Support in part	The standard provides for minimum sight distances for vehicle crossings onto roads with greater than a 60km/h posted and less than 60km/h, which requires compliance with Figure 12 and Figure 13, respectively. The diagram in Figure 12 provides for sight distances for 50km/h and 60km/h posted speed zones, but these are not required in Figure 13 where those speed limits are provided for. Waka Kotahi supports the diagram in Figure 12 but considers that this should be applied to all posted speed limits of 50km/h or greater, which would be consistent with the New Zealand Transport Agency Planning Policy Manual.	Amend the rule as follows: <ol style="list-style-type: none"> <li>Any vehicle crossing onto roads with <u>equal to or greater than a 50km/h</u> <del>60km/h</del> posted speed must comply with the minimum sight distance in Figure 12.</li> </ol>
	TRAN-S14	Support	Waka Kotahi supports the standard as it provides a maximum of 1 vehicle crossing from a site to a National Route, which includes the state highway network.	Retain as notified.

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought															
	TRAN-S15	Support in part	Waka Kotahi generally supports the use of the standard as it provides minimum distances between vehicle crossings on the same side of the road based on the speed limit. However, the standards in Table 18 are inconsistent with the Waka Kotahi Policy Planning Manual – Appendix 5B (PPM) for vehicle crossings onto the state highway with a 70km/h posted speed or greater. As currently proposed, this could result in adverse safety effects on the state highway network.	<p>Amend Table 18 as follows:</p> <table border="1" data-bbox="1406 496 2018 1062"> <thead> <tr> <th data-bbox="1406 496 1541 735">— rontage road speed limit</th> <th data-bbox="1541 496 1787 735">F — Minimum distance between vehicle crossing on <u>Local, Collector, Regional Arterial, District Arterial and Principal.</u></th> <th data-bbox="1787 496 2018 735">— <u>Minimu</u> <u>m distance</u> <u>between vehicle</u> <u>crossing on</u> <u>National Route</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="1406 735 1541 815">— 0km/h</td> <td data-bbox="1541 735 1787 815">7 — 40m</td> <td data-bbox="1787 735 2018 815">— <u>40m</u></td> </tr> <tr> <td data-bbox="1406 815 1541 895">— 0km/h</td> <td data-bbox="1541 815 1787 895">8 — 70m</td> <td data-bbox="1787 815 2018 895">— <u>100m</u></td> </tr> <tr> <td data-bbox="1406 895 1541 975">— 0km/h</td> <td data-bbox="1541 895 1787 975">9 — 85m</td> <td data-bbox="1787 895 2018 975">— <u>200m</u></td> </tr> <tr> <td data-bbox="1406 975 1541 1062">— 00km/h</td> <td data-bbox="1541 975 1787 1062">1 — 105m</td> <td data-bbox="1787 975 2018 1062">— <u>200m</u></td> </tr> </tbody> </table>	— rontage road speed limit	F — Minimum distance between vehicle crossing on <u>Local, Collector, Regional Arterial, District Arterial and Principal.</u>	— <u>Minimu</u> <u>m distance</u> <u>between vehicle</u> <u>crossing on</u> <u>National Route</u>	— 0km/h	7 — 40m	— <u>40m</u>	— 0km/h	8 — 70m	— <u>100m</u>	— 0km/h	9 — 85m	— <u>200m</u>	— 00km/h	1 — 105m	— <u>200m</u>
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— 00km/h	1 — 105m	— <u>200m</u>																	
	TRAN-S16	Support	Waka Kotahi supports the standard with associated Table 19 and Figure 15, as they provide for appropriate standards for the minimum distances between vehicle crossings and intersections which are consistent with the Waka Kotahi PPM.	Retain as notified.															
	TRAN-S17	Support in part	The intent of the standard is generally supported by Waka Kotahi as it provides for vehicle crossing designs onto roads with a 70km/h or greater posted speed limit. The vehicle crossing design standards in Figure 16 and Figure 17 are consistent with the Waka Kotahi standards in the PPM.	<p>Amend Table 20 as follows:</p> <table border="1" data-bbox="1406 1262 2018 1385"> <thead> <tr> <th data-bbox="1406 1262 1621 1385">— aily Traffic Volumes using the</th> <th data-bbox="1621 1262 1809 1385">D — Is the vehicle</th> <th data-bbox="1809 1262 2018 1385">— Figur e to use for</th> </tr> </thead> <tbody> <tr> <td data-bbox="1406 1262 1621 1385"></td> <td data-bbox="1621 1262 1809 1385"></td> <td data-bbox="1809 1262 2018 1385"></td> </tr> </tbody> </table>	— aily Traffic Volumes using the	D — Is the vehicle	— Figur e to use for												
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Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought												
			<p>However, Table 20 incorrectly references the vehicle crossing standards on the state highway for 1-30 daily traffic volumes as it currently requires activities to meet Figure 17. However, it is considered that 1-30 daily traffic volumes on a state highway should only be required to meet the vehicle crossing design in Figure 16, which is equivalent to a Waka Kotahi Diagram C in the PPM.</p> <p>The requirement for 31-100 daily traffic volumes on a state highway to meet Figure 17 is supported and is consistent with the Waka Kotahi PPM.</p>	<table border="1"> <thead> <tr> <th></th> <th>vehicle crossing (ECMs*)</th> <th>crossing on a state highway?</th> <th>vehicle crossing design</th> </tr> </thead> <tbody> <tr> <td>—</td> <td>—</td> <td>1</td> <td>—</td> </tr> <tr> <td>.</td> <td>— 30</td> <td>Yes</td> <td>— <u>Figure 16</u> <u>Figure 17</u> (Vehicle crossing without shoulder widening)</td> </tr> </tbody> </table>		vehicle crossing (ECMs*)	crossing on a state highway?	vehicle crossing design	—	—	1	—	.	— 30	Yes	— <u>Figure 16</u> <u>Figure 17</u> (Vehicle crossing without shoulder widening)
	vehicle crossing (ECMs*)	crossing on a state highway?	vehicle crossing design													
—	—	1	—													
.	— 30	Yes	— <u>Figure 16</u> <u>Figure 17</u> (Vehicle crossing without shoulder widening)													
	TRAN-S18	Support	Waka Kotahi supports the standard as it requires there be no reverse manoeuvring onto the site or off the road from a National Road.	Retain as notified.												
	TRAN-S20	Support	Waka Kotahi supports the standard and associated Table 21, which identifies thresholds for high traffic generating activities that require either a basic ITA or a full ITA.	Retain as notified.												
<b>Hazards and Risks</b>																
<b>NH – Natural Hazards</b>																
<b>Natural Hazard Objectives</b>	NH-O2	Support	Waka Kotahi supports this objective which recognises that sometimes it is impractical to locate infrastructure outside of a high hazard area.	Retain as notified												
<b>Natural Hazard Policies</b>	NH-P5	Support in part	Waka Kotahi largely supports this objective, however, requests that the operational needs of infrastructure are also recognised in this policy.	<p>Amend as follows:</p> <p><i>Require subdivision and Regionally Significant Infrastructure in Liquefaction Awareness Areas to apply appropriate measures to avoid or, where avoidance is not reasonably practicable due to the functional <u>or operational</u> needs of the activity, mitigate risks to people and property.</i></p>												

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
	NH-P6	Support in part	Waka Kotahi largely supports this objective, however, requests that the operational needs of infrastructure are also recognised in this policy. There are times where infrastructure does not have a functional need to only locate in a particular environment, but rather has an operational need to be located in a particular location as there are often no other reasonable alternatives.	Amend as follows:  <i>Require subdivision and Regionally Significant Infrastructure in the Earthquake Fault Awareness Areas overlay to be designed or located in a way that avoids or, where avoidance is not reasonably practicable due to the functional <u>or operational</u> needs of the activity, mitigates risks to people and property.</i>
	NH-P9	Support	Waka Kotahi supports this policy which recognises that natural hazard mitigation works do sometimes need to be undertaken by the Crown (of which Waka Kotahi NZ Transport Agency would be considered) to protect existing communities and that effects cannot be avoided but rather, shall be mitigated.	Retain as notified
	NH-P11	Support	Waka Kotahi supports this policy which recognises that Regionally Significant Infrastructure may have an operational or functional need to be located within a Natural Hazard Area. However, it would be more helpful if the policy specifically acknowledged that the linear nature of some infrastructure, such as roading, is one reason why it may not be practicable, or sometimes possible, to avoid locations subject to natural hazards.	Amend as follows:  <i>Only allow Regionally Significant Infrastructure in Natural Hazard Areas where:</i> <ol style="list-style-type: none"> <li><i>1. it has an operational need or functional need for the location, <u>including as a result of the linear nature of some infrastructure</u>, and there are no feasible alternative locations; and</i></li> <li><i>2. it is designed to maintain its integrity and function during and after a natural hazard event, or it is able to be readily re-instated after a natural hazard event; and</i></li> <li><i>3. it is designed and located to ensure that it will not exacerbate the risks or potential adverse effects of the natural hazard on surrounding land.</i></li> </ol>
<b>Natural Hazard Rules</b>	NH-R3	Support in part	Waka Kotahi generally support Rule NH-R3, which provides for a limited scale of natural hazard mitigation works, however, if this rule cannot be met	Amend the matters of discretion as follows:

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			and resource consent is required as a Restricted Discretionary Activity, the potential effects on infrastructure should also be considered in addition to the risk for people, property and public spaces.	Matters of discretion are restricted to: <ol style="list-style-type: none"> <li>1. <i>the likely effectiveness of the natural hazard mitigation works and the need for them; and</i></li> <li>2. <i>the extent of any adverse social, cultural and environmental effects, including on any sensitive environments; and</i></li> <li>3. <i>any potential adverse effects of diverting or blocking overland flow path(s), including upstream and downstream flood risks; and</i></li> <li>4. <i>any increased flood risk for people, property, <u>infrastructure</u> or public spaces; and</i></li> <li>5. <i>the extent to which alternative locations and options for the natural hazard mitigation works have been considered and the merits of those; and</i></li> <li>6. <i>any positive effects of the proposal on the community.</i></li> </ol>
	NH-R5	Support	Waka Kotahi is supportive of this rule which provides for infrastructure maintenance, replacement and upgrade activities provided that the infrastructure is within 5m of the existing alignment and the above ground footprint is not increased by more than 10%. If works do not meet these thresholds consent is triggered as a Restricted Discretionary Activity of which the matters of discretion include the functional or operational need of the activity, which is also supported by Waka Kotahi.	Retain as notified
	NH-R6	Support	This rule provides a permitted activity status for new above ground Regionally Significant Infrastructure, provided it meets the criteria set out in the rule. Waka Kotahi is supportive of this rule which does not cover new structures within the road reserve.	Amend the rule as follows: Regionally Significant Infrastructure – New NH-R6.1 does not apply if:

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
				<ol style="list-style-type: none"> <li>1. <i>the infrastructure is below ground; or</i></li> <li>2. <i>above ground infrastructure is less than 10m<sup>2</sup> and is not located within a high hazard area as determined under NH-S1; or</i></li> <li>3. <i>the structure is located within a road corridor.</i></li> </ol>
<b>Historical and Cultural Values</b>				
<b>HH – Historic Heritage</b>				
<b>Historic Heritage Objectives</b>	HH-O3	Support	Waka Kotahi has principles to maintain heritage items, which is consistent with the outcomes sought by the objective. Therefore, Waka Kotahi supports the objective as proposed.	Retain as notified.
<b>Historic Heritage Policies</b>	HH-P7	Support	The policy is supported to only allow subdivision, earthworks or new buildings within the settings of Historic Heritage Items, where alternatives have been considered, there is sufficient land around the item to maintain heritage items, and there are measures to minimise obstruction of views of the heritage item from adjoining may result from any proposed building, future land use or development.	Retain as notified.
<b>TREES – Notable Trees</b>				
<b>Notable Trees Policies</b>	TREE-P3	Support	Waka Kotahi is supportive of providing for new activity and development within the root protection area where there is necessary for the maintenance of regionally significant infrastructure.	Retain as notified.
	TREE-P4	Support	Waka Kotahi is supportive of providing for the removal of notable trees where there is an imminent threat to the safety of people or property or where this is required to maintain regionally significant infrastructure.	Retain as notified.
<b>Notable Trees Rules</b>	TREE-R1	Support	Waka Kotahi is supportive of providing for the pruning and trimming of branches of Notable Trees. This allows for Waka Kotahi to maintain the	Retain as notified.

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			Notable trees to ensure the continued safe and efficient function of the State Highway networks.	
	TREE-R3	Support	Waka Kotahi is supportive of providing for new activity and development within the root protection area where there is necessary for the maintenance of regionally significant infrastructure.	Retain as notified
<b>SASM – Sites and Areas of Significance to Māori</b>				
<b>Sites and Areas of Significance to Māori Rules</b>	SASM-R1.1	Support	Waka Kotahi is supportive of providing for earthworks associated with the maintenance of roads within the Wāhi Tūpuna Overlay. This allows for Waka Kotahi to maintain the safe and efficient function of the State Highway networks.	Retain as notified.
	SASM-R1.2	Support	Waka Kotahi is supportive of providing for earthworks associated with the maintenance of roads within the Wāhi Taoka and Wai Taoka Overlay. This allows for Waka Kotahi to maintain the safe and efficient function of the State Highway networks.	Retain as notified.
	SASM-R3 – PER-2	Support	Waka Kotahi is supportive of providing for the removal of indigenous vegetation where there is an imminent threat to the safety of people, structures or utilities.	Retain as notified.
	SASM-R3 – PER-2	Support	Waka Kotahi is supportive of providing for the removal of indigenous vegetation where this is for the purpose of maintenance repair or replacement of road or network utilities.	Retain as notified.
<b>Natural Environment Values</b>				
<b>ECO – Ecosystems and Indigenous Biodiversity</b>				
<b>Ecosystems and Indigenous</b>	ECO-P2	Support	Waka Kotahi supports the policy, which provides for the clearance of indigenous vegetation in Significant Natural Areas where it's appropriate for	Retain as notified.

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/ Reasons	Relief Sought
<b>Biodiversity Policies</b>			health and wellbeing or customary reasons. In particular we support clearance where the indigenous vegetation causes imminent danger to human life, structures or utilities; and the operation, maintenance or repair of public roads.	
	ECO-P5	Support in part	<p>This policy is largely supported by Waka Kotahi as it seeks to avoid clearance of indigenous vegetation and earthworks in Significant Natural Areas (SNAs) unless these activities are undertaken in a way that protects identified ecological values and are for regionally significant infrastructure and it can be demonstrated that adverse effects are managed in accordance with EI-P2.</p> <p>This policy should be amended to include a provision for regionally significant infrastructure as the provisions in EI do not apply to transport.</p>	<p>It is sought that EI-P2 should be amended to recognise transport infrastructure or to amend this policy as follows:</p> <p>Avoid the clearance of indigenous vegetation and earthworks within SNAs, unless these activities:</p> <ol style="list-style-type: none"> <li><i>can be undertaken in a way that protects the identified ecological values; and</i></li> <li><i>are for regionally significant infrastructure and it can be demonstrated that adverse effects are managed in accordance with EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure; <u>or</u></i></li> <li><i><u>are for transport related regionally significant infrastructure and it can be demonstrated that adverse effects are managed.</u></i></li> </ol>
<b>Ecosystems and Indigenous Biodiversity Rules</b>	ECO-R1	Support in part	Waka Kotahi seeks an amendment or new rule to include a standard which permits the clearance of indigenous vegetation within Significant Natural Areas Overlay where it is associated with the operation, maintenance and repairs of regionally significant transport infrastructure.	Amendment or new rule sought to provide for the clearance of indigenous vegetation within SNAs for works associated with the operation, maintenance and repairs of regionally significant transport infrastructure.
<b>NATC – Natural Character</b>				
<b>Natural Character Objectives</b>	NATC-O1	Support	The objective is supported which recognises the natural character of Timaru District's wetlands and rivers and their margins need to be preserved and protected from inappropriate subdivision, use and development, and where	Retain as notified.

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			possible enhanced. It is particularly supported in that it acknowledged that wetlands and rivers can only be enhanced where possible.	
<b>Natural Character Policies</b>	NATC-P4	Support in part	Waka Kotahi seeks an amendment to the policy to add an additional provision to provide for the subdivision, use and development associated with works for regionally significant infrastructure, where there is an operational or functional need.	Amend policy to include the following provision:  <i>5. is for the operation, maintenance and repair of regionally significant infrastructure where there is an operational or functional need.</i>
	NATC-P5	Support in part	Waka Kotahi seeks an amendment to the policy as noted to recognise there may be an operational or functional need to undertake works within riparian margins.	Amend policy to include the following provision:  <i>6. is for the operation, maintenance and repair of regionally significant infrastructure where there is an operational or functional need.</i>
<b>Natural Character Rules</b>	NATC-R1	Support in part	The rule is supported in that it provides for permitted vegetation clearance. However, an additional amendment is requested to provide for vegetation clearance that is for the maintenance, repair or operation of regionally significant infrastructure.	Amend rule to provide for vegetation clearance associated with maintenance, repair or operation of regionally significant infrastructure.
	NATC-R3	Support in part	The rule is supported in that it provides for earthworks within riparian margins of a river not in a HNWB. An additional provision is requested in 1 to provide for earthworks that are associated with the maintenance, repair or operation of regionally significant infrastructure outside of the HNWB.  The notified provision 2. is supported for earthworks required for the maintenance and operation of existing roads within HNWB.	Amend rule to as follows:  <u>PER-5</u>  <u>The earthworks are required for the maintenance, repair or operation of regionally significant infrastructure.</u>

**NFL – Natural Features and Landscapes**

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
<b>Natural Features and Landscapes Policies</b>	NFL-P2	Support in part	Waka Kotahi seeks an amendment to the policy. It is considered that the policy should provide for the upgrade, maintenance and operation of regionally significant infrastructure, such as the state highway, within the areas identified in SCHED8 and SCHED9. The policy should also recognise that there are operational or functional needs for regionally significant infrastructure to be within these areas.	<p>Amend the policy as follows:</p> <p><i>Enable certain activities in Visual Amenity Landscapes, Outstanding Natural Features and Outstanding Natural Landscapes, including existing non-intensive primary production, small scale earthworks, maintenance of existing tracks and fences, <u>upgrade, maintenance and the operation of regionally significant infrastructure</u>, and underground utilities, that are consistent with:</i></p> <ol style="list-style-type: none"> <li><i>protecting the identified values and characteristics of the Outstanding Natural Landscapes and Outstanding Natural Features described in SCHED8 – Schedule of Outstanding Natural Landscapes and SCHED9 – Schedule of Outstanding Natural Features <u>unless there is an operational or functional need</u>; and</i></li> </ol>
	NFL-P4	Support in part	The intent of the policy is supported. However, the policy should recognise that there is a functional or operational need for regionally significant infrastructure to be within SCHED8 or SCHED9. There are instances where there are no suitable alternatives, and the infrastructure must be located within these areas and they will likely have some impact on the landscapes or features.	<p>Amend the policy as follows:</p> <p><i>Avoid subdivision, use and development within outstanding natural features and outstanding natural landscapes that area not provided in NFL-P2, unless it:</i></p> <ol style="list-style-type: none"> <li><i>will maintain natural landforms, natural processes and vegetation areas and patterns, <u>or</u></i></li> <li><i>is regionally significant infrastructure that has a functional or operational need to be located within outstanding natural landscapes and outstanding natural features described in SCHED8 – Schedule of outstanding natural landscapes and SCHED9 – Schedule of outstanding natural features.</i></li> </ol>

**VS – Versatile Soil**

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
<b>Versatile Soil Rules</b>	VS-R1	Support	Waka Kotahi supports excluding the widening, upgrading and sealing of existing roads from the maximum coverage provision within the existing extent of the road reserve.	Retain as notified.
<b>Subdivision</b>				
<b>SUB – Subdivision</b>				
<b>Subdivision Objectives</b>	SUB-O1	Support	Waka Kotahi supports allowing for subdivision where this will have minimal adverse effects on regionally significant infrastructure.	Retain as notified.
	SUB-O2	Support	Waka Kotahi supports allowing subdivision where infrastructure has been provided in an integrated, efficient and co-ordinated manner.	Retain as notified.
<b>Subdivision Policies</b>	SUB-P5	Support	Waka Kotahi supports allowing for subdivision where this will not result in reverse sensitivity effects on regionally significant infrastructure	Retain as notified.
	SUB-P6	Support	Waka Kotahi supports allowing for subdivision where: <ul style="list-style-type: none"> <li>a) the infrastructure network has capacity to accommodate development or appropriate upgrades are completed to support this,</li> <li>b) new infrastructure is provided in an efficient and integrated way with existing or proposed infrastructure,</li> <li>c) multi-nodal and active transport links are appropriately considered; and,</li> <li>d) there is sufficient legal and physical access to each allotment</li> </ul>	Retain as notified
	SUB-P10	Support	Waka Kotahi supports allowing for subdivision where: <ul style="list-style-type: none"> <li>a) vehicle crossing proliferation is minimised,</li> <li>b) the resulting road and access environment is safe and accessible,</li> </ul>	Retain as notified.

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			c) this provides for multi-modal travel options,	
<b>Subdivision Rules</b>	SUB-R1	Support	Waka Kotahi supports including matters of control relating to: a) roading, accessways and right of ways, vehicle crossings and the associated connectivity, b) the provision, location, design, specification, construction, connection and timing of infrastructure, transport links, c) infrastructure capacity, d) legal and physical access arrangements; and, e) measures to manage effects.	Retain as notified.
	SUB-R2	Support	Waka Kotahi supports providing for new allotments to be created as a Controlled Activity for the purpose of roading.	Retain as notified.
	SUB-R3	Support	Waka Kotahi supports including matters of discretion relating to: a) roading, accessways and right of ways, vehicle crossings and the associated connectivity, b) the provision, location, design, specification, construction, connection and timing of infrastructure, transport links, c) infrastructure capacity, d) legal and physical access arrangements; and, e) measures to avoid, remedy or mitigate effects on infrastructure and measures to manage adverse effects.	Retain as notified.
<b>Subdivision Standards</b>	SUB-S2	Support	Waka Kotahi supports requiring the alignment with the stormwater chapter and requiring written approval in regard to the acceptance of stormwater.	Retain as notified.

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
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			Waka Kotahi holds regional consent to manage stormwater in the state highway network and need to ensure that these are not impacted from stormwater discharge from adjacent properties.	
	SUB-S6	Support	Waka Kotahi supports not providing for vehicular access to a state highway without consultation with Waka Kotahi. This will ensure that appropriate consideration is given to achieve safe access to the state highway network.	Retain as notified.

**General District-Wide Matters**

**EW – Earthworks**

<b>Earthworks Objectives</b>	EW-O1	Support in part	EW-O1 seeks to recognise the requirement for earthworks that enable subdivision and land development in the District. In the Introduction, reference is made to wider development and states that the effects from earthworks are also dealt with in other chapters, including the Infrastructure Chapter. However, EI-O2: Adverse effects of Regionally Significant Infrastructure and EI-P2: managing adverse effects of Regionally Significant Infrastructure and other Infrastructure do not make any specific reference to earthworks required for infrastructure (operation, maintenance, upgrades or new infrastructure). Therefore, Waka Kotahi suggests that the need for earthworks related to regionally significant infrastructure is inserted into Objective EW-O1 as per the suggested wording, or alternatively (or as well as) in the Energy and Infrastructure chapter where consideration for transport as regionally significant infrastructure is sought with associated exclusions for other rules in the Plan. Furthermore, EW-P1 recognises the necessity of earthworks for the provision of utilities. This should be made more explicit in proposed EW-O1.	Amend as follows:  <i>Earthworks facilitate subdivision and the use and development, <u>including regionally significant infrastructure</u>, of the District's land resource, while ensuring that its adverse effects on the surrounding environment are avoided or mitigated.</i>
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Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
<b>Earthworks Policies</b>	EW-P1	Support	Waka Kotahi supports proposed EW-P2 as the policy recognises the benefits and necessity of earthworks for utility purposes. However, this should also be reflected in the Earthworks and Infrastructure and Energy objectives for consistency.	Retain as notified.
	EW-P4	Support	Waka Kotahi support proposed EW-P4 which seeks to protect Regionally Significant Infrastructure (of which the state highway is included) from the potential adverse effects from third parties undertaking earthworks.	Retain as notified.
<b>Earthworks Rules</b>	EW-R1	Support	Waka Kotahi supports proposed EW-R1 which provides an exemption for earthworks that are for infrastructure activities – as provided for in the Infrastructure and Energy chapter.	Retain as notified.
<b>FDA – Future Development Area</b>				
<b>Future Development Area Objectives</b>	FDA-02	Support	Waka Kotahi supports that the Future Development Areas shall not be developed until the land is rezoned and a comprehensive Development Area Plan is approved. This ensures that effects on infrastructure and the transport network are appropriately considered and managed through the process.	Retain as notified.
<b>Future Development Area Policies</b>	FDA-P4	Support	The policy is supported by Waka Kotahi as it requires that Development Area Plans address matters such as supporting quality compact urban form, future servicing needs, integration with the surrounding area, provision for multi-modal transport and connected transport networks.  Spelling error: P4.8 'multi-nodal' to be replaced with 'multi-modal'.	Retain the policy as notified but amend the spelling error to replace with 'multi-modal'.
<b>LIGHT – Light</b>				
<b>General comments</b>		Support in part	Waka Kotahi seeks further consideration of the terminology used within the Light Chapter.	Further consideration of including 'obtrusive light' terminology from the AS/NZS4282;2019.

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			'Obtrusive light' addresses more types of lighting beyond just spill light, e.g. glare, upward light, luminous intensity and luminance of surface areas. The term obtrusive light aligns with AS/NZS4282; 2019.	
<b>Light Objectives</b>	LIGHT-O2	Support in part	Waka Kotahi generally supports the objective, which recognises the benefits of artificial lighting, but an amendment is sought to replace road safety with 'transport and public areas'.	Amend objective: <i>The benefits of artificial lighting are recognised while any adverse effects generated do not compromise the health and safety of people and communities, including <del>road safety</del> the transport network and public areas.</i>
<b>Light Policies</b>	LIGHT-P1	Support in part	An amendment is sought to change the word 'road' to transport and public area, and to change 'sky glow and light spill' to obtrusive light because sky glow is a cumulative area resultant from a combination of natural sky glow and artificial sky glow from varied light sources. Obtrusive light addresses more types of lighting beyond just spill light, e.g. glare, upward light, luminous intensity and luminance of surface areas.  The term obtrusive light aligns with AS/NZS4282; 2019.	Amend the policy to:  ... <i>3. supports the social, cultural and economic wellbeing and health and safety of people and communities, including <del>road safety</del> the transport network and public areas; and</i> <i>4. minimises sky glow and light spill obtrusive light, and...</i>
	LIGHT-P3	Support	Waka Kotahi is supportive of the policy, which seeks to avoid all artificial outdoor lighting that does not meet the intensity, type, and direction requirements for light sensitive areas unless it is critical for health and safety reasons.	Retain as notified.
<b>Light Rules</b>	LIGHT-R1	Support in part	Waka Kotahi seeks further clarification on the criteria of PER-2, as it considered that PER-3 will sufficiently specifies the requirements of lighting adjoining Light Sensitive Areas. The use of 'is visible' from a Light Sensitive Area could require assessment from an extended distance.	Further clarification on the different requirements of PER-2 and PER-3.
<b>Light Standards</b>	LIGHT-S1	Support in part	The standard is generally supported. While it is acknowledged that the standard requires calculations to be made by a person who is professionally qualified and competent in the discipline, further clarification is sought on the parameters of measurements e.g. 1.5m above finished ground level	Further clarification is sought on the parameters of measurements required under LIGHT-S1.

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			with no influences such as fences, hedges or trees or moon light, night sky, etc.	
	LIGHT-S2	Support	Waka Kotahi is supportive of the standard to manage outdoor artificial lighting on any site between sunset and sunrise on any state highway, arterial or principal road and that all exterior lighting shall be orientated away from any state highway or road or oncoming traffic.	Retain as notified.
<b>NOISE – Noise</b>				
<b>Noise Objectives</b>	NOISE-O2	Support in part	Waka Kotahi supports the intent of the policy as it recognises that the state highway should not be constrained by reverse sensitivity effects. However, protecting human health is considered to be the primary approach for managing reverse sensitivity effects. It is recommended that either the rule be amended to explicitly set out to protect human health for the noise sensitive activities in high noise environments.	Amend the objective as follows:  <i>Noise sensitive activities shall avoid reverse sensitivity effects to protect human health from noise generating activities such as <del>The Airport, Raceway, State Highway, railway lines and the Port</del> and activities located within commercial, mixed use and Industrial zones are not constrained by reverse sensitivity effects arising from noise sensitive activities.</i>
<b>Noise Policies</b>	NOISE-P5	Support	Waka Kotahi supports the policy as it seeks to address reverse sensitivity by controlling new and altered noise sensitivity activities through location and design. This is an appropriate approach for managing effects of noise on human health.	Retain as notified.
<b>Noise Rules</b>	NOISE-R9	Oppose in part	Waka Kotahi is comfortable with the intent of such a rule but seeks amendments to address concerns with the state highway distances, PER-1, and parts of PER-2.  <b>State Highway Distances:</b>  The 40m and 80m distances from the state highway when there is a posted speed limit of 50km/h or less or greater than 50km/h, respectively, is appropriate for State Highway 8, State Highway 79 and 50km/h sections of State Highway 1. It is not appropriate for State Highway 1 when the speed	Amend the rule to increase the distance from the state highway in posted speeds of greater than 50km/h to 100m for State Highway 1 or use the variable noise contour approach which we expect to introduce to Council as part of the further submission process.  Exclude road noise from PER-1.2.  Amend PER-2 to replace '20m' with '50m'.

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			<p>is greater than 50km/h, as a 100m distance would provide better control to ensure human health is protected from noise effects from the state highway. The rule should be updated to provide for a 100m distance area from State Highway 1 where the speed is greater than 50km/h.</p> <p>An alternative option to consider is that variable noise contours are being developed by Waka Kotahi, which could be implemented as a state highway noise control overlay. If the shapefiles for these are available then Waka Kotahi would also support this approach, with associated amendments to the rule. It is anticipated that these will be available by the further submission stage.</p> <p><b>PER-1</b></p> <p>The approach that PER-1 appears to be taking is that it specifies how much noise reduction the building has to provide. This approach can result in a deficiency in sound insulation in some houses (and parts of houses) and some with too much insulation due to the variable external traffic noise. The preference to Waka Kotahi is that the rule should specify the resulting noise inside of a habitable space as it is an effects based approach.</p> <p><b>PER-2</b></p> <p>This permitted standard appears to provide for alternative pathways for compliance. There is concern that PER-2.b does not provide for an equivalent standard to the other pathways on PER-2.a and in PER-1. It is recommended that the distance in PER-2.b be amended from 20m to 50m.</p>	
<b>Noise Standards</b>	NOISE-S3	Support in part	As per the submission point on NOISE-R9 – PER-1, there is concern over the approach used. It is recommended that the standard be updated to reflect the resulting noise inside of a habitable space as it is an effects	It is recommended that the standard be amended as follows:

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			<p>based approach. There is also concern that the matters of discretion provide allowance for non-compliance without addressing the adverse effect.</p> <p>In addition to above, vibration and outdoor noise have not been recognised within this standard. These additional factors that could have an impact on human health, unless reverse sensitivity is appropriately addressed.</p>	<p>Remove road-traffic from NOISE-S3.1 and add a new section pas NOISE-S.3 requiring internal levels in habitable rooms of 40 dB LAeq(24h), external levels of 57 dB LAeq(24h) in outdoor living spaces, and within 20m of a state highway vibration limit of 0.3 mm/s vw95. Compliance to be demonstrated by design certificate.</p> <p>Delete matters of discretion for NOISE-S3.3 and replace with a single matter being the effects of exceedances.</p>
	NOISE-S4	Support in part	<p>The standard is generally supported. However, it is recommended that it be amended to recognise and provide for thermal comfort and cooling requirements for all habitable rooms. There is also concern that the matters of discretion provide allowance for non-compliance without addressing the adverse effects.</p>	<p>It is recommended that the standard be amended as follows:</p> <ol style="list-style-type: none"> <li>1. <i>The minimum external to internal noise reduction levels in NOISE-S3 must be achieved at the same time as the ventilation requirements of the New Zealand Building Code. An alternative means of ventilation must be provided within <u>all habitable rooms</u> <del>any study or bedroom</del> unless an acoustic design certificate signed by a suitably qualified acoustic engineer is provided that states the design of any bedroom or any study as proposed will comply with the NOISE-S3 acoustic insulation standards with windows open.</i></li> <li>2. <i>Ventilation systems where installed must generate sound levels <u>and temperatures</u> not exceeding:</i> <ol style="list-style-type: none"> <li>a. <i>35 dB LAeq(30s) when measured 1 metre away from any grille or diffuser; and</i></li> <li>b. <i>provide an adjustable airflow rate of up to at least 6 air changes per hour; <u>and</u></i></li> <li>c. <i><u>Maintain a temperature that does not exceed 25°C</u></i></li> </ol> </li> </ol>

**SIGN – Signs**

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/ Reasons	Relief Sought
<b>Signs Policies</b>	SIGN-P1	Oppose in part	Waka Kotahi supports this policy as it identifies permitted signs that are compatible with the purpose, character and qualities of the zone in which they are located. However, it is unclear whether Traffic Control Devices (Road Signs) are identified within this policy.	It is recommended that this policy is amended to include official signs which while may not be in keeping with the zone purpose or qualities are required for health and safety reasons.
	SIGN-P2	Support	Waka Kotahi supports the policy as notified to manage road safety.	Retain as notified
	SIGN-P3	Support	Waka Kotahi supports the policy as notified which seeks to limit off-site commercial advertising signs.	Retain as notified
<b>Signs Rules</b>	SIGN-R1	Support	Waka Kotahi supports the rule as it provides for a permitted activity status for official signs.	Retain as notified.
<b>Signs Standards</b>	SIGN -S1	Support in part	Waka Kotahi generally support SIGN-S1, however, request that clause 3 be amended to cover all signs visible from a road.  Council should also consider whether additional standards should be included within this standard next to Table 27 & 28. This could include sight distances based on posted/operating speeds, setbacks from Traffic Control Devices, or maximum number of words/elements. The Traffic Control Devices Manual – Part 3 Advertising Signs (Appendix 1) gives direction to these standards to reduce potential traffic safety effects.	Amend as follows:  <i>3. All signs <del>within 10 horizontal metres of</del> <u>visible from</u> a road must comply with the minimum lettering sizes in Table 27 – Minimum lettering size.</i>
	SIGN-S2	Support in part	Waka Kotahi supports this standard (clause 8) which states that no digital billboard shall be located adjoining a state highway. However, it is sought that the standard also provides for discretion of adverse effects on traffic safety, which is a key consideration when assessing digital billboards as they have the ability to distract the attention of road users and result in traffic safety effects.	Waka Kotahi request that the matters of discretion be amended to include traffic safety. Suggested wording is as follows:  <b><i>Matters of discretion are restricted to</i></b>  <i>1. the frequency and intensity of flashing and/or image change; and</i> <i>2. extent of illumination when visible from a public place or neighbouring property; and</i> <i>3. impact on surrounding activities; and</i>

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
				<p>4. <i>impacts on the amenity and character of the surrounding environment; and</i></p> <p>5. <i>whether the sign would result in any direct light overspill onto a residential property or the road network; and</i></p> <p>6. <i><u>any adverse effects on traffic safety; and</u></i></p> <p>7. <i>any positive effects of the sign.</i></p>
	SIGN-S5	Oppose in part	Waka Kotahi supports this standard which limits the number of temporary signs per site, however, if this standard is not met, Waka Kotahi suggest that the matters of discretion should be extended to include potential effects on traffic safety.	<p>Waka Kotahi request that the matters of discretion be amended to include traffic safety. Suggested wording is as follows:</p> <p><b><i>Matters of discretion are restricted to:</i></b></p> <p>1. <i>any impact on the character and amenity values of the surrounding area; and</i></p> <p>2. <i>whether the sign contributes to visual clutter; and</i></p> <p>3. <i>any adverse cumulative effects; and</i></p> <p>4. <i><u>any adverse effects on traffic safety; and</u></i></p> <p>5. <i>any positive effects of the sign.</i></p>
	SIGN-S6	Oppose in part	Waka Kotahi supports this standard which limits the number of signs (excluding official and temporary signs) per site, however, if this standard is not met, Waka Kotahi suggest that the matters of discretion should be extended to include potential effects on traffic safety.	<p>Waka Kotahi request that the matters of discretion be amended to include traffic safety. Suggested wording is as follows:</p> <p><b><i>Matters of discretion are restricted to:</i></b></p> <p>1. <i>any impact on the character and amenity values of the surrounding area; and</i></p> <p>2. <i>whether the sign contributes to visual clutter; and</i></p>

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought																																		
				<p>3. <i>any adverse cumulative effects; and</i></p> <p>4. <i><u>any adverse effects on traffic safety; and</u></i></p> <p>5. <i>any positive effects of the sign.</i></p>																																		
	Table 27	Oppose in part	<p>Table 27 – Minimum lettering size sets out the minimum lettering size depending on the speed limit and main/secondary messaging. Table 6.2 of the Traffic Control Devices Manual provides recommended letter sizing for advertising signs.</p> <p>Waka Kotahi suggest that Table 27 should be amended to better reflect Table 6.2 of the TCD Manual. The table is provided below:</p> <p><b>Table 6.2: Minimum recommended letter sizes on roadside advertising signs</b></p> <table border="1"> <thead> <tr> <th rowspan="2">— ted speed limit (km/h)</th> <th>Pos</th> <th colspan="3">Letter height</th> </tr> <tr> <th>— n message</th> <th>— perty name</th> <th>— Secondary message</th> <th></th> </tr> </thead> <tbody> <tr> <td>— 50</td> <td>— 150</td> <td>— 100</td> <td>— 75</td> <td></td> </tr> <tr> <td>— 60</td> <td>— 175</td> <td>— 125</td> <td>— 90</td> <td></td> </tr> <tr> <td>— 70</td> <td>— 200</td> <td>— 150</td> <td>— 100</td> <td></td> </tr> <tr> <td>— 80</td> <td>— 250</td> <td>— 175</td> <td>— 125</td> <td></td> </tr> <tr> <td>— 100</td> <td>— 300</td> <td>— 200</td> <td>— 150</td> <td></td> </tr> </tbody> </table>	— ted speed limit (km/h)	Pos	Letter height			— n message	— perty name	— Secondary message		— 50	— 150	— 100	— 75		— 60	— 175	— 125	— 90		— 70	— 200	— 150	— 100		— 80	— 250	— 175	— 125		— 100	— 300	— 200	— 150		Amend Table 27 to better reflect the minimum lettering size as set out in Table 6.2 of the TCD Manual.
— ted speed limit (km/h)	Pos	Letter height																																				
	— n message	— perty name	— Secondary message																																			
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— 100	— 300	— 200	— 150																																			
	Table 28	Oppose in part	Table 28 – Separation distances is based off the speed limit. Waka Kotahi suggest that Table 28 should be amended to better reflect the separation	Clarification is requested from the Council regarding the separation distances and how these should apply. In addition, consideration of the																																		

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
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			<p>distance set out in Table 5.3 of the TCD Manual. The table is provided below:</p> <p><b>Table 5.3: Minimum distances between adjacent roadside advertising signs</b></p> <table border="1"> <thead> <tr> <th>— Posted speed limit (km/h)</th> <th>— Minimum recommended spacing (m)</th> <th>— Desirable spacing (m)</th> </tr> </thead> <tbody> <tr> <td>— 50</td> <td>— 50</td> <td>— 80</td> </tr> <tr> <td>— 60</td> <td>— 55</td> <td>— 100</td> </tr> <tr> <td>— 70</td> <td>— 60</td> <td>— 150</td> </tr> <tr> <td>— 80</td> <td>— 70</td> <td>— 200</td> </tr> <tr> <td>— 100</td> <td>— 80</td> <td>— 250</td> </tr> </tbody> </table>	— Posted speed limit (km/h)	— Minimum recommended spacing (m)	— Desirable spacing (m)	— 50	— 50	— 80	— 60	— 55	— 100	— 70	— 60	— 150	— 80	— 70	— 200	— 100	— 80	— 250	recommended separation distances as set out in Table 5.3 of the TCD Manual should be considered.
— Posted speed limit (km/h)	— Minimum recommended spacing (m)	— Desirable spacing (m)																				
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— 60	— 55	— 100																				
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— 80	— 70	— 200																				
— 100	— 80	— 250																				

**TEMP – Temporary Activities**

<b>Temporary Activities Policies</b>	TEMP-PX	Support in part	<p>TEMP-P1: Benefits of temporary activities acknowledges the benefits of temporary activities as a whole, but it does not give consideration to potential adverse effects. While Waka Kotahi do not have concerns with the policy as proposed, it is suggested that a new policy is inserted which seeks to manage the potential adverse effects of temporary activities. Policies TEMP-P2, TEMP-P3 and TEMP-P4 all recognise the potential adverse effects of the activities they relate to, however, there are temporary activities outside of those covered by P2, P3 and P4. Therefore, Waka Kotahi suggest that a new policy is inserted which covers the management of effects for any temporary activity.</p>	<p>Insert a new policy as follows:</p> <p><b><i>TEMP-PX – Managing adverse effects of temporary activities</i></b></p> <p><i>Provide for temporary activities while managing adverse effects on the surrounding environment, including regionally significant infrastructure.</i></p>
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Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
	TEMP-P2	Support	Waka Kotahi supports proposed policy TEMP-P2, specifically clause 3 which recognises the importance of ensuring temporary activities do not adversely affect the safety and efficiency of the transport network.	Retain as notified

**Part 3 – Area Specific Matters**

**Zones**

**RESZ - Residential Zones**

**GRZ – General Residential Zone**

<b>General Residential Zone Policies</b>	GRZ-P2	Support in part	The intent of the policy is generally supported. However, it is considered that there are adverse effects beyond amenity values from the movement of people and vehicles for non-residential activities. It is considered that the policy be amended to broaden the scope of adverse effects.	Amend the policy as follows: <i>Enable home business, small-scale non-residential activities where:</i> <ol style="list-style-type: none"> <li>1. they are compatible with the character and qualities of the surrounding area; and</li> <li>2. any home-based business is ancillary to a residential activity; and</li> <li>3. they do not result in adverse effects <del>on the amenity values of adjoining sites</del> arising from the movement of people and vehicles associated with the activity that cannot be mitigated; and</li> <li>4. the hours of operation are compatible with residential amenity.</li> </ol>
	GRZ-P5	Oppose in part	It is considered that there are adverse effects beyond amenity values from the movement of people and vehicles for non-residential activities. Therefore, an amendment is sought to the policy to consider safety of the transport network to capture appropriate effects that can result from incompatible activities with the General Residential zone.	Amend as follows: <i>Avoid activities that are likely to be incompatible or inconsistent with the character, qualities and purpose of the General residential zone, unless:</i> <ol style="list-style-type: none"> <li>1. the activity is such a small scale that it will not have any adverse effects on residential amenity <u>or safety of the transport network</u>; or</li> </ol>

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
				<p>2. <i>the site adjoins a zone that permits that activity and the activity will not have any adverse effects on residential amenity; or</i></p> <p>3. <i>GRZ-P4 is complied with.</i></p>
<b>General Residential Zone Rules</b>	GRZ-R2	Support	The rule and the associated matters of discretion where PER-1 is not complied with are generally supported as they provide for consideration on the design of the access.	Retain as notified.
	GRZ-R4	Support	The rule is supported as it requires that home business requires compliance with GRZ-S11, which has consideration for traffic generation.	Retain as notified.
	GRZ-R12	Support	Waka Kotahi supports the rule for emergency service facilities in the general rural zone, as it provides for matters of discretion that consider access and signage.	Retain as notified.
<b>General Residential Zone Standards</b>	GRZ-S11	Support	Waka Kotahi supports the standards for home business with the matters of discretion that relate to traffic generation.	Retain as notified.
<b>MRZ – Medium Density Residential Zone</b>				
<b>Medium Density Residential Zone Policies</b>	MRZ-P4	Support in part	The policy is generally supported by Waka Kotahi. However, home business activities should consider effects beyond amenity values. It is recommended that the policy be amended to ensure that home business activities do not compromise the safety of pedestrians and cyclists or on the transport network.	Amend the policy to include:  <i><u>x. does not compromise the safety of pedestrians, cyclists or on the transport network.</u></i>
	MRZ-P6	Support in part	The policy is generally supported by Waka Kotahi. However, non-residential activities should consider effects beyond amenity values. It is	Amend the policy to include:

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			recommended that the policy be amended to ensure that home business activities do not compromise the safety of pedestrians and cyclists or on the transport network.	<u>x. does not compromise the safety of pedestrians, cyclists or on the transport network.</u>
	MRZ-P7	Support in part	The intent of the policy is generally supported. However, it is considered that there are adverse effects beyond amenity values from the movement of people and vehicles for non-residential activities. It is considered that the policy be amended to broaden the scope of adverse effects.	Amend as follows:  <i>Avoid activities that are likely to be incompatible or inconsistent with the character, qualities and purpose of the <u>General Medium Density residential zone, unless:</u></i>  <i>4. the activity is such a small scale that it will not have any adverse effects on residential amenity or <u>safety of the transport network</u>; or...</i>
<b>Medium Density Residential Zone Rules</b>	MRZ-R2	Support	The rule and the associated matters of discretion where PER-1 is not complied with are generally supported as they provide for consideration on the design of the access.	Retain as notified.
	MRZ-R4	Support	The rule is supported as it requires that home businesses require compliance with MRZ-S8, which considers the maximum number of vehicle trips and traffic generation.	Retain as notified.
	MRZ-R14	Support	Waka Kotahi supports the rule for emergency service facilities in the general rural zone, as it provides for matters of discretion that consider access and signage.	Retain as notified.
<b>Medium Density Residential Standards</b>	MRZ-S8	Support	The standard is supported as it sets out appropriate standards for the maximum number of vehicle trips for a home business per site. It also sets out that traffic generation is a matter of discretion, which ensures that transport effects can be considered when the standard is not achieved.	Retain as notified.

**RURZ – Rural Zones**

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
<b>GRUZ – General Rural Zone</b>				
<b>General Rural Zone Objectives</b>	GRUZ-O5	Support in Part	The objective is generally supported; however, Waka Kotahi supports allowing mining and quarrying where it can be demonstrated that this will not impact on the safe and efficient function of the state highway networks. It is considered that the objective requires amending to align with GRUZ-P6.	Amend as follows:  <i>Mining and quarrying occurs in the General Rural Zone where the resource exists and where it will have no or minimal adverse <u>effects</u> on the <u>transport network</u>, sensitive environments and sensitive activities.</i>
<b>General Rural Zone Policies</b>	GRUZ-P6	Support	Waka Kotahi supports allowing mining and quarrying activities where there is suitable and safe vehicle access, and the road network can accommodate the activity safely and efficiently.	Retain as notified.
	GRUZ-P7	Support	Waka Kotahi supports allowing rural industries and other activities where there is adequate infrastructure and where the scale location and intensity will not compromise the safety and efficiency of the roading network.	Retain as notified.
<b>General Rural Zone Rules</b>	GRUZ-R12	Support in Part	The rule is generally supported; however, Waka Kotahi seeks to control rural produce retail on the state highway in speed environments with a speed limit greater than 50km/h. Rural retail activities can result in additional vehicle movements and vehicle manoeuvring in locations that may not be suitable for these to occur. It is considered that the speed limit for permitted rural retail activities be amended from 80km/h to 50km/h to ensure that the safe and efficient function of the state highway is maintained.	Amend as follows:  <i>PER-3</i>  <i>The access to the retail area is from a road, except where the road is a state highway with a speed limit greater than <del>80km/h</del> <u>50km/h</u>; and</i>
	GRUZ-R21	Support	Waka Kotahi supports only allowing rural industry activities where the activity does not adversely impact on the safe and efficient operation of the road network.	Retain as notified.
	GRUZ-R23	Support in Part	The rule is generally supported; however, Waka Kotahi seeks that for any quarry expansion activity this must demonstrate that this will not impact on the safe and efficient function of the state highway networks. It is	Amend the matters of discretion to include:

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/ Reasons	Relief Sought
			considered that the matters of discretion need to relate to the effects on the road network.	<u>the extent of adverse effects on the safe and efficient operation of the transport network</u>
<b>RLZ – Rural Lifestyle Zone</b>				
<b>Rural Lifestyle Zone Rules</b>	RLZ-R12	Support in part	The rule is generally supported; however, Waka Kotahi seeks to control rural produce retail on State Highway's in speed environments with a speed limit greater than 50km/h. Rural retail activities can result in additional vehicle movements and vehicle manoeuvring in locations that may not be suitable for these to occur. It is considered that the speed limit for permitted rural retail activities be amended from 80km/h to 50km/h to ensure that the safe and efficient function of the state highway is maintained.	Amend as follows: <i>PER-4</i> <i>Access to the retail area is not from a state highway with a speed limit greater than <del>80km/h</del> 50km/h; and</i>
<b>SETZ – Settlement Zone</b>				
<b>Settlement Zone Rules</b>	SETZ-R9	Support in part	The rule is generally supported; however, Waka Kotahi seeks that community facilities this must demonstrate that this will not impact on the safe and efficient function of the state highway network. It is considered that the matters of control need to relate to the effects on the road network.	Amend the matters of control to include: <u>the extent of adverse effects on the safe and efficient operation of the transport network</u>
	SETZ-R10	Support in part	The rule is generally supported; however, Waka Kotahi seeks that cafés must demonstrate that this will not impact on the safe and efficient function of the state highway networks. It is considered that the matters of control need to relate to the effects on the road network.	Amend the matters of control to include: <u>the extent of adverse effects on the safe and efficient operation of the transport network</u>
	SETZ-R11	Support in part	The rule is generally supported; however, Waka Kotahi seeks those industrial activities within existing industrial buildings must demonstrate that this will not impact on the safe and efficient function of the state	Amend the matters of control to include: <u>the extent of adverse effects on the safe and efficient operation of the transport network</u>

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			highway networks. It is considered that the matters of control need to relate to the effects on the road network.	
	SETZ-R13	Support in part	The rule is generally supported; however, Waka Kotahi seeks industrial activities must demonstrate that this will not impact on the safe and efficient function of the state highway networks. It is considered that the matters of discretion need to relate to the effects on the road network.	Amend the matters of discretion to include:  <i><u>the extent of adverse effects on the safe and efficient operation of the transport network</u></i>
<b>CMUZ – Commercial and Mixed Use Zones</b>				
<b>NCZ – Neighbourhood Centre Zone</b>				
<b>Neighbourhood Centre Zone Objectives</b>	NCZ-O2	Support in part	The objective is generally supported as it ensures that Neighbourhood Centres are established in locations that are easily accessible by walking and cycling, and that there are well designed parking areas that are easily accessible from the road network. However, it should also recognise that these connections must be safe.	Amend as follows:  The character and qualities of the Neighbourhood centre zone comprise:  <i>4. well-designed parking areas that are easily accessible <u>and safe</u> from the road network and integrate with the design of the site.</i>
<b>Neighbourhood Centre Zone Policies</b>	NCZ-P1	Support	Waka Kotahi is supportive of the policy, which seeks to enable a range of small-scale commercial activities, that serve the surrounding neighbourhood but are of a scale that do not detract from the Local Centre or City Centre Zones. The Neighbourhood Centre zone promotes walkable catchments and promotes multi-modal transport.	Retain as notified.
<b>Neighbourhood Centre Zone Standards</b>	NCZ-S5	Support in part	Waka Kotahi supports the standard that requires any outdoor storage areas, except for the display of goods for retail sale, to be fully screened by a fence of not less than 2m in height so that is not visible from adjoining sites and roads. This is supports as it will reduce distraction from users of the transport network.  An amendment is sought that any fence posts required by this standard adjacent to a state highway, which has a legal speed limit that exceeds	Amendment sought to require any fencing adjacent to a State Highway, where the speed limit exceeds 70km/hr, must not have a maximum diameter that exceed 100mm.

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			70km/hr shall have a maximum diameter of 100mm to ensure frangibility of an errant vehicle.	
<b>LCZ – Local Centre Zone</b>				
<b>Local Centre Zone Policies</b>	LCZ-P3	Support	Waka Kotahi supports the policy, particularly as it seeks to ensure local centres are integrated with streets and public spaces and provides a high quality pedestrian experience.	Retain as notified.
<b>Local Centre Zone Standards</b>	LCZ-S4	Support in part	<p>Waka Kotahi supports the standard that requires any outdoor storage areas, except for the display of goods for retail sale, to be fully screened by a fence of not less than 2m in height so that is not visible from adjoining sites and roads. This is supports as it will reduce distraction from users of the transport network.</p> <p>An amendment is sought that any fence posts required by this standard adjacent to a state highway, which has a legal speed limit that exceeds 70km/hr shall have a maximum diameter of 100mm to ensure frangibility of an errant vehicle.</p>	Amend sought to require any fencing adjacent to a State Highway, where the speed limit exceeds 70km/hr, must not have a maximum diameter that exceed 100mm.
<b>LFRZ – Large Format Retail Zone</b>				
<b>Large Format Retail Zone Policies</b>	LFRZ-P4	Support	Waka Kotahi is supportive of the policy, which seeks to avoid land-use activities being open for business and available to the public within the Large Format Retail Zone prior to the construction and operation of a signalized intersection at Grants Road and State 1 and the zone being fenced along the rail corridor.	Retain as notified.
<b>Large Format Retail Zone Rules</b>	LFRZ-R9	Support	The rule is supported to as new buildings and structures within the Large Format Retail Zone is restricted discretionary, and the matters of discretion include public transport and vehicle and pedestrian access.	Retain as notified.

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
<b>Large Format Retail Zone Standards</b>	LFRZ-S4	Support in part	<p>Waka Kotahi supports the standard that requires any outdoor storage areas, except for the display of goods for retail sale, to be fully screened by a fence of not less than 2m in height so that is not visible from adjoining sites and roads. This is supported as it will reduce distraction from users of the transport network.</p> <p>An amendment is sought that any fence posts required by this standard adjacent to a state highway, which has a legal speed limit that exceeds 70km/hr shall have a maximum diameter of 100mm to ensure frangibility of an errant vehicle.</p>	Amend sought to require any fencing adjacent to a State Highway, where the speed limit exceeds 70km/hr, must not have a maximum diameter that exceed 100mm.
	LFRZ-S6	Support	The standard is supported that requires land use activities not to open for business prior to the signalised intersection at Grants Road and State Highway 1 being constructed and operation, and the 1.8m fence being installed along the rail corridor.	Retain as notified.
<b>MUZ – Mixed Use Zone</b>				
<b>Mixed Use Zone Objectives</b>	MUZ-O2	Support	Waka Kotahi is supportive of the objective, which seeks to accommodate large numbers of people, and is well integrated with public transport, walking and cycling connections and which provides a safe and functional working and residential environment that is consistent with the activities provided for within the Zone.	Retain as notified.
<b>Mixed Use Zone Rules</b>	MUZ-R10	Support	The rule is supported as new buildings and structures within the Mixed Use Zone are controlled, and the matters of control include consideration of pedestrian and traffic safety.	Retain as notified.
<b>Mixed Use Zone Standards</b>	MUZ-S4	Support in part	Waka Kotahi supports the standard that requires any outdoor storage areas, except for the display of goods for retail sale, to be fully screened by a fence of not less than 2m in height so that is not visible from adjoining	Amendments sought to require any fencing adjacent to a State Highway, where the speed limit exceeds 70km/hr, must not have a maximum diameter that exceed 100mm.

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			<p>sites and roads. This will reduce distraction from users of the transport network.</p> <p>An amendment is sought that any fence posts required by this standard adjacent to a state highway, which has a legal speed limit that exceeds 70km/hr shall have a maximum diameter of 100mm to ensure frangibility of an errant vehicle.</p>	
<b>TCZ – Town Centre Zone</b>				
<b>Town Centre Zone Rules</b>	TCZ-R6	Support	TCZ-R6.2 is supported as it identifies that buildings and structures in the Town Centre Zone – Temuka are a controlled activity. The matters of control considers how development should address the street frontage by providing a pedestrian-focused environment, and for Vine Street, that the design and layout of car parking is at the rear of buildings but has adequate access and manoeuvring space. The matters of control also consider the practicality and adequacy of existing or proposed connections to King Street.	Retain as notified.
	TCZ-R8	Support	The rule is supported for emergency service facilities as a controlled activity. In particular the matters of control as they include the location access, the design and layout of on-site pedestrian connections, traffic generation and impact on transport network.	Retain as notified.
<b>Town Centre Zone Standards</b>	TCZ-S4	Support in part	Waka Kotahi supports the standard that requires any outdoor storage areas, except for the display of goods for retail sale, to be fully screened by a fence of not less than 2m in height so that is not visible from adjoining sites and roads. This will reduce distraction from users of the transport network.	Amendments sought to require any fencing adjacent to a State Highway, where the speed limit exceeds 70km/hr, must not have a maximum diameter that exceed 100mm.

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/ Reasons	Relief Sought
			An amendment is sought that any fence posts required by this standard adjacent to a state highway, which has a legal speed limit that exceeds 70km/hr shall have a maximum diameter of 100mm to ensure frangibility of an errant vehicle.	
<b>GIZ – General Industrial Zone</b>				
<b>GIZ – General Industrial Zone</b>				
<b>General Industrial Zone Objectives</b>	GIZ-O3	Support in part	Waka Kotahi requests that this objective be amended so that it is recognised that the industrial zone shall not compromise the safe and efficient operation of the transport network. An amendment to this effect is suggested.	<p>Amend as follows:</p> <p><i>Use and development in the General Industrial Zone:</i></p> <ol style="list-style-type: none"> <li><i>is located so that it can be appropriately serviced by infrastructure and does not compromise the safe operation of existing infrastructure; and</i></li> <li><i>is not compromised by the establishment of sensitive activities; and</i></li> <li><i>does not compromise the strategic role and function of any of the Commercial and Mixed Use Zones; and</i></li> <li><i>maintains the amenity values of adjacent Residential and Open Space and Recreation Zones.</i></li> </ol>
<b>General Industrial Zone Policies</b>	GIZ-P1	Support in part	Waka Kotahi request that this policy be amended to acknowledge the potential effects industrial activities can have on the transport network. As such, Waka Kotahi have suggested an amendment to the policy to include this.	<p><i>Enable a range of industrial activities and associated activities where:</i></p> <ol style="list-style-type: none"> <li><i>ancillary activities are conducted on the same site as the primary industrial activity; and</i></li> <li><i>does not include residential activities; and</i></li> <li><i>do not adversely affect the safe and efficient operation of the transport network; and</i></li> </ol>

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
				4. <i>they are compatible and complementary to the purpose, character and qualities of the General Industrial Zone.</i>
	GIZ-P2	Support in part	Off-site industrial activities ancillary to the primary activity has the potential to adversely affect the safe and efficient operation of the transport network such that Waka Kotahi requests an amendment to this policy to address the potential effects.	<p><i>Only allow industrial ancillary activities on a different site of the primary industrial activity where:</i></p> <ol style="list-style-type: none"> <li><i>1. they are conducted on an adjoining or adjacent site as the primary industrial activity; and</i></li> <li><i>2. they do not undermine the purpose, viability and function of any of the Commercial and Mixed Use Zones; and</i></li> <li><i>3. they do not adversely affect the safe and efficient operation of the transport network; and</i></li> <li><i>4. they are compatible and complementary to the purpose, character and qualities of the General Industrial Zone.</i></li> </ol>
	GIZ-R2	Support in part	Waka Kotahi supports the matters of discretion listed when PER-3 is not complied with, as the potential effects on the roading network and road safety are acknowledged. However, as per the above comments on the objectives and policies of the zone, these effects should be included in the policy framework.	As above.
<b>OSRZ – Open Space and Recreation Zones</b>				
<b>OSZ – Open Space Zone</b>				
<b>Open Space Zone Objectives</b>	OSZ-O2	Support	Waka Kotahi supports that the Open Space Zone should be safe and accessible users, which includes pedestrians, cyclists, motorists, and other active modes of transport.	Retain as notified.
<b>SARZ – Sport and Active Recreation Zone</b>				

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
<b>Sport and Active Recreation Zone Objectives</b>	SARZ-O2	Support	Waka Kotahi supports that the Sport and Active Recreation Zone should be safe and accessible users, which includes pedestrians, cyclists, motorists, and other active modes of transport.	Retain as notified.
<b>Development Areas</b>				
<b>DEV1 – Broughs Gully Residential Development Area</b>				
<b>DEV1 Objectives</b>	DEV1-O1	Support	Waka Kotahi is supportive of the objective, which seeks to ensure development is established in a comprehensive manner, particularly as it recognises that residential development is integrated and coordinated with infrastructure and the road and pedestrian network is efficient, connected and safe.	Retain as notified.
<b>DEV1 Standards</b>	DEV1-S1	Support	The standard is supported, which requires developers to establish new roads to be constructed in general accordance with the Development Area Plan prior to the land use, subdivision or development and prior to any new buildings being occupied.	Retain as notified.
<b>DEV2 – Gleniti Residential Development Area</b>				
<b>DEV2 Objectives</b>	DEV2-O1	Support	Waka Kotahi is supportive of the objective, which seeks to ensure development is established in a comprehensive manner, particularly as it recognises that residential development is integrated and coordinated with infrastructure and the road and pedestrian network is efficient, connected and safe.	Retain as notified.
<b>DEV2 Standards</b>	DEV2-S1	Support	The standard is supported, which requires developers to establish new roads to be constructed in general accordance with the Development Area Plan prior to the land use, subdivision or development and prior to any new buildings being occupied.	Retain as notified.

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
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**DEV3 – Washdyke Industrial Development Area**

<b>DEV3 Objectives</b>	DEV3-O1	Support	Waka Kotahi is supportive of the objective, which seeks to ensure development is established in a comprehensive manner, particularly as it recognises that residential development is integrated and coordinated with infrastructure and the road and pedestrian network is efficient, connected and safe.	Retain as notified.
<b>DEV2 Standards</b>	DEV3-S1	Support	The standard is supported, which requires developers to establish new roads to be constructed in general accordance with the Development Area Plan prior to the land use, subdivision or development and prior to any new buildings being occupied.	Retain as notified.

**DEV4 – Temuka North West Residential Development Area**

<b>DEV4 Objectives</b>	DEV4-O1	Support	Waka Kotahi is supportive of the objective, which seeks to ensure development is established in a comprehensive manner, particularly as it recognises that residential development is integrated and coordinated with infrastructure and the road and pedestrian network is efficient, connected and safe.	Retain as notified.
<b>DEV4 Standards</b>	DEV4-S1	Support	The standard is supported, which requires developers to establish new roads to be constructed in general accordance with the Development Area Plan prior to the land use, subdivision or development and prior to any new buildings being occupied.	Retain as notified.

**Designations**

**NZTA - New Zealand Transport Agency**

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
<b>Part 3 – Area Specific Matters Designations</b>	Purpose of the designation	Support in part	Waka Kotahi generally supports the purpose of the NZTA-1, NZTA-2, NZTA-3 and NZTA-4 designations as notified. However, the designation purpose as notified is inconsistent with the purpose of our designation as recorded in district plans across New Zealand.	Amend as follows:  <u>To construct, operate, maintain, and improve a state highway and associated infrastructure.</u>
	NZTA-1			
	NZTA-2		To achieve national consistency and clarity, Waka Kotahi recommends Council amend the designation purpose for NZTA-1, NZTA-2, NZTA-3 and NZTA-4 as per the relief sought.	
	NZTA-3			
	Site identifier NZTA-1	Support in part	Waka Kotahi generally supports the site identifier description for designation NZTA-1 as notified. However, to provide greater clarity and consistency it is recommended that minor amendments are made to the site identifier text.	Amend as follows:  <i>State Highway 1</i>  <i>From the Ashburton District Council boundary in the north to the Waimate District Council boundary in the south.</i>
	Site identifier NZTA-2	Support in part	Waka Kotahi generally supports the site identifier description for designation NZTA-2 as notified. However, to provide greater clarity and consistency it is recommended that minor amendments are made to the site identifier text.	Amend as follows:  <i>State Highway 8</i>  <i>From the Mackenzie District Council boundary in the west to the intersection with State Highway 1, Washdyke in the east.</i>
	Site identifier NZTA-3	Support in part	Waka Kotahi generally supports the site identifier description for designation NZTA-3 as notified. However, to provide greater clarity and consistency it is recommended that minor amendments are made to the site identifier text.	Amend as follows:  <i>State Highway 78</i>  <i>From the Intersection with State Highway 1, at Timaru in the west to Marine Parade, Timaru in the east.</i>
	Site identifier NZTA-4	Support in part	Waka Kotahi generally supports the site identifier description for designation NZTA-4 as notified. However, to provide greater clarity and consistency it is recommended that minor amendments are made to the site identifier text.	Amend as follows:  <i>State Highway 79</i>

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
				<i>From the Mackenzie District Council boundary in the west to the intersection with State Highway 1 at Rangitata in the east.</i>
	Lapse date or Identification the designation has been given effect to NZTA-1 NZTA-2 NZTA-3 NZTA-4	Support in part	Waka Kotahi generally supports the lapse date descriptions as notified. However, to provide greater clarity and consistency it is recommended that minor amendments are made to the lapse date descriptions for designations NZTA-1, NZTA-2, NZTA-3 and NZTA-4.	Amend as follows: <del>Designation has been given effect to (i.e. no lapse date)</del> <u>Given effect to</u>
	Designation Hierarchy NZTA-1 NZTA-3 NZTA-4	Support in part	Waka Kotahi generally supports the inclusion of designations NZTA-1, NZTA-3 and NZTA-4. For clarity it is recommended the designation hierarchy be amended from 'primary' to 'varies' as there are sections of state highway designation that overlap with KiwiRail's designations.	Amend as follows: <del>Primary</del> <u>Varies</u>
	Designation Hierarchy NZTA-2	Support	Waka Kotahi supports the designation hierarchy for designation NZTA-2 as notified.	Retain as notified
	Conditions (p) and (r)	Oppose	The designation schedule for NZTA-1 excludes reference to the recommended conditions dated 8 January 2003 on the Notice of Requirement to realign State Highway 1 at Normanby. Transit New Zealand	Amend as follows: <b>Traffic noise effects</b>

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
	NZTA-1		<p>as the requiring authority accepted these conditions on 11 March 2003. The construction works to realign this section of State Highway 1 have been completed so the designation has been given effect to.</p> <p>Waka Kotahi continues to maintain this section of State Highway 1 in accordance with conditions (p) and (r). However, because this designation has been given effect to Waka Kotahi recommends Council update conditions (p) and (r) as recommended through the relief provided.</p> <p>Waka Kotahi therefore opposes the conditions within the schedule for designation NZTA-1 and recommends Council insert updated conditions (p) and (r). We also recommend Council update the number of these conditions at the same time.</p>	<p>(p) <i>A 300 m length of "Open Graded Porous Asphalt (OGPA)" quiet road surfacing, or an alternative form of quiet road surfacing that will achieve at least the equivalent traffic noise level, will be applied within 12 months of completion of the realignment and maintained between meterage points 5900 and 6200 shown on the aerial photos attached in Appendix 3 of the Addendum, to ensure traffic noise levels at the McGlinchy, Donaldson and Paul properties meet or remain within the levels recommended by the Transit Guidelines.</i></p> <p>(r) <i>A 400 m length of OGPA quiet road surfacing, or an alternative form of quiet road surfacing that will achieve at least the equivalent traffic noise level, be applied within 12 months of completion of the realignment and will be maintained between meterage points 6400 and 6800 shown on the aerial photos attached in Appendix 3 of the November 2002 Addendum, so as to ensure traffic noise levels at the Monson, Sturgeon and Barrett properties remain within the 1999 Transit Guidelines.</i></p>
	Condition (o) NZTA-1	Oppose	<p>The designation schedule for NZTA-1 excludes reference to the conditions on the Notice of Requirement to realign State Highway 1 at Normanby. The construction works to realign this section of State Highway 1 have been completed.</p> <p>The Waka Kotahi network maintenance contract for State Highway 1 includes a requirement for our contractor to mow the road reserve including the section referenced in condition (o). Our day to day network maintenance therefore complies with condition (o)</p>	<p>Remove the following condition:</p> <p><del>(o) <i>Alongside the highway, where fences are placed 13 m from the edge of the road in fill and 9 m from the edge of the road in cut, the areas between the road edge and fences are to be mown at intervals not greater than 3 monthly with particular attention being given to weed control in such areas. Mowing requirements may be reduced through the use of slower growing grasses.</i></del></p>

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			Retaining this condition consequently creates an unnecessary administrative task for Council. Waka Kotahi recommends Council remove condition (o) from designation NZTA-1.	
	Conditions (a)-(n), (q), (s)-(v) NZTA-1	Oppose	<p>The designation schedule for NZTA-1 excludes reference to the conditions on the Notice of Requirement to realign State Highway 1 at Normanby. The works to realign this section of State Highway 1 have been completed. Consequently, conditions (a)-(n), (q), (s)-(v) have been given effect to, as they are primarily construction conditions.</p> <p>Waka Kotahi therefore recommends Council remove conditions (a)-(n), (q), (s)-(v) from designation NZTA-1.</p>	<p>Remove the following conditions:</p> <p><u>Construction noise</u></p> <p><i>(a) Transit will comply with the requirement of the New Zealand Standard NZS 6803:1999 "Acoustics – Construction Noise".</i></p> <p><u>Dust emissions during construction, and potential short term adverse landscape/visual effects</u></p> <p><i>(b) Vegetation removal is to be kept to the minimum necessary for construction purposes.</i></p> <p><i>(c) Dust nuisance is to be mitigated during construction, excavation, and the movement of soil and machinery by dampening soil with water.</i></p> <p><i>(d) The extent of any stockpile areas is to be kept to a minimum, and such areas shall be reinstated for appropriate use following the conclusion of construction.</i></p> <p><i>(e) Cuts and fills are to be re-vegetated. Areas that are re-sown in grass will be used for grazing or mown as appropriate and will be kept stock free until the grass can support grazing.</i></p> <p><u>Potential long term landscape/visual effects</u></p> <p><i>(f) Cut slopes are to be reduced to a gradient of 4:1.</i></p> <p><i>(g) Fill slopes are to be at a gradient of 3:1 or, if possible 4:1.</i></p>

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
				<p><i>(h) — Vegetation clearance will be kept to the minimum necessary for construction purposes.</i></p> <p><i>(i) — Cuts and fills are to be re-vegetated. Sown areas that are intended for grazing will be kept stock free until the grass can support grazing.</i></p> <p><i>(j) — Those sections of the existing State Highway 1 that will not provide property access or access to the new section of highway are to be removed and re-instated as may be appropriate in each case. The area where the new alignment parts from the existing highway is to be screened with a small stand of trees to mark the change of road alignment and mask the remnant line of the old highway. Those sections of the existing State Highway 1 that will remain in place to provide property access or access to the new section of highway will have their status as "state highway" uplifted, and responsibility for these sections of road will thereafter transfer to the Timaru District Council.</i></p> <p><i>(k) — Areas used for disposal of soil or borrow of fill are to be re-contoured and re-vegetated.</i></p> <p><i>(l) — To avoid encroaching into residential frontages on the south side of Talbots Road, existing batter slopes and vegetation shall be retained. A "vertical pole and half round" timber retaining wall shall be constructed along the cut at the base of the batter down to road level (so as to entail less disturbance of the batter than a crib wall).</i></p> <p><i>(m) — Landscape plans will be prepared by Transit in consultation with the Dales and the Barretts, so as to screen the highway as viewed from the Sturgeon, Dale and Barrett properties (Transit now owns the Sturgeon property). Transit shall submit these landscape plans to</i></p>

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
				<p><i>the Council for its verification of this consultative process prior to construction commencing. Following such verification, the plans will be implemented as part of the works and shall include provision of plants and materials for this purpose.</i></p> <p><i>(n) — On local roads, where land is currently grazed alongside the road, fences will be placed at the toes of 3:1 cut slopes and the slopes re-sown and returned to grazing.</i></p> <p><u><i>Traffic noise effects</i></u></p> <p><i>(q) — For the Ellen's house, in addition to the quiet surfacing to be applied and maintained between meterage points 5900 and 6200, Transit will undertake measurements of traffic noise levels at this property within a period of three months after construction of the revised alignment is completed, to determine whether further noise mitigation is needed. Should such mitigation be required, Transit shall thereafter give effect to the most appropriate further traffic noise mitigation method, which may include either sound insulation, and/or relocation of the house on site, or removal of the house.</i></p> <p><i>(s) — For the Fosters' property, Transit will undertake measurements of traffic noise levels at this property within three months following the completion of construction of the deviation, to determine whether any noise mitigation is required in order to bring the existing dwelling within Transit guidelines. If shown to be necessary, Transit shall give effect to such mitigation. Mitigation may include sound insulation of the dwelling or quiet surfacing to be applied and maintain to the State Highway.</i></p> <p><i>(t) — For the Barretts' property, Transit will undertake measurements of traffic noise levels at this property within three months following the</i></p>

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
				<p><del>completion of construction of the deviation. Such measurements are to determine whether the proposed application of OGPA as per condition (r) has brought the existing dwelling within Transit guidelines, or whether sound insulation of the dwelling is required. If such insulation is shown to be necessary, it shall be provided by Transit so as to bring the existing dwelling within Transit guidelines.</del></p> <p><del>Watercourses</del></p> <p><del>(u) — Any water flow in the ephemeral watercourses crossed by the proposed new section of highway is to be maintained through the construction process.</del></p> <p><del>Cultural and heritage values</del></p> <p><del>(v) — Appropriate cultural and heritage protocols are to be included in the construction contract documentation and subsequently observed during construction works, should any artefacts or other items of archaeological, cultural or spiritual significance be discovered during site works.</del></p>
	Additional Information NZTA-1 NZTA-2 NZTA-3 NZTA-4	Support	Waka Kotahi supports the additional information for designations NZTA-1, NZTA-2 NZTA-3 and NZTA-4 as notified.	Retain as notified
<b>Designations</b>	Planning maps	Support	Waka Kotahi supports the inclusion of the state highway designations shown on the planning maps as notified.	Retain as notified

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
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**Part 4 – Appendices and Schedules**

**Schedules**

**SCHED15 – Schedule of Future Development Areas**

<p><b>FDA1, FDA2, FDA4</b></p>	<p>Oppose in part</p>	<p>Waka Kotahi recognises that the land identified for residential development that are identified as Future Development Areas (FDA) 1, 2 and 4 are adjacent to existing urban areas and that it will subject to addressing matters under FDA-P4. However, there are several considerations that need to be given to determine whether this land is appropriate to be rezoned to residential land, such as:</p> <ul style="list-style-type: none"> <li>• Development of this land will occur on the outskirts of the existing Timaru urban environment. This land will open up additional capacity which may hinder demand within the existing urban environment, such as infill within the Medium Density Zoning adjacent to the Timaru town centre. Intensification of existing areas would achieve better transport outcomes compared to greenfield development.</li> <li>• It is understood that the Housing Capacity Assessment has set that this land should be developed to achieve a minimum density of 12 households per hectare. This is inconsistent with the agreed approach from the Grierson Greenfield Density Analysis Technical Report, which is to achieve a minimum density of 15 householders per hectare unless there are demonstrated constraints, then a minimum of 12 households per hectares shall apply.</li> <li>• The FDAs would need to be assessed against Government Policy, such as the National Policy Statements on Urban Development (NPS-UD) and Highly Productive Land (NPS-HPL).</li> </ul>	<p>Consider the matters described to determine whether these FDAs are appropriate to be rezoned to residential zoning.</p>
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Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
		<ul style="list-style-type: none"> <li>How will these FDA's consider Central Government direction on climate change implications and how will it achieve transport outcomes sought under the Emissions Reduction Plan (ERP) to reduce vehicle kilometres travelled (VKT's) and transport related emissions.</li> <li>The growth direction demonstrated by these FDAs would make it difficult to provide high quality and frequent public transport to serve these new areas. A whole life transport costs assessment should be undertaken to determine whether it is feasible.</li> </ul>		
<b>FDA8, FDA9, FDA10, FDA11</b>	Oppose in part	<p>Waka Kotahi recognises that the land identified for rural-lifestyle development that are identified as FDAs 8, 9, 10 and 11 are adjacent to existing urban areas and that it will subject to addressing matters under FDA-P4. However, there are several considerations that need to be given to determine whether this land is appropriate to be rezoned to rural lifestyle land, such as:</p> <ul style="list-style-type: none"> <li>The land is dispersed living away from amenities or public transport and multi-modal transport routes. It is likely that these will be reliant on private vehicle use as the only way to travel.</li> <li>How will these FDAs consider Central Government direction on climate change implications and how will it achieve transport outcomes sought under the ERP to reduce VKT's and transport related emissions.</li> </ul>	Consider the matters described to determine whether these FDAs are appropriate to be rezoned to rural lifestyle zoning.	
<b>FDA14</b>	Oppose	<p>Waka Kotahi opposes this FDA for the following reasons:</p> <ul style="list-style-type: none"> <li>The land does not appear to be well integrated with existing urban areas and would not achieve good transport outcomes. There is a lack of connectivity, poor public transport provision,</li> </ul>	Delete FDA14.	

Proposed Plan Amendment Section	Item	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			<p>limited multi-modal transport options (walking, cycling, etc) and it would be private vehicle oriented. The area should achieve a compact form that is accessible to local amenities and job opportunities.</p> <ul style="list-style-type: none"> <li>• The site will unlikely achieve a reduction in VKT's due to the reliance on private vehicle use, which would not achieve the outcomes sought for the transport network as per the ERP.</li> <li>• The site is adjacent to both State Highway 1 and 8, which have high posted speed environments (70km/h+) and are both Limited Access Roads under the Government Roding Powers Act 1989. Access to the site will likely be via the intersections with Kennels Road and may require significant improvements to ensure safety outcomes.</li> <li>• It is considered that this site would not achieve objectives of the NPS-UD and is disconnected from the rest of the planned activities within Timaru.</li> <li>• The site would not achieve the outcomes sought in Chapter 5.1.2 of the Canterbury Regional Policy Statement.</li> </ul> <p>Based on above, it is considered that this land is not appropriate as a FDA and should be removed from the Proposed Timaru District Plan.</p>	

**Form 6**

**Waka Kotahi NZ Transport Agency further submission on notified proposal for the Proposed Timaru District Plan under Clause 8 of Schedule 1 of the Resource Management Act 1991**

4 August November 2023

To: Timaru District Council  
Via online submission tool

Name of Submitter: Waka Kotahi NZ Transport Agency  
PO Box 1479  
Christchurch 8011

Address for Service: Attention: Stuart Pearson  
Phone: (021) 052 5917  
Email: [stuart.pearson@nzta.govt.nz](mailto:stuart.pearson@nzta.govt.nz)

**This is a further submission on a change proposed to the following plan:**

Proposed Timaru District Plan.

**The Waka Kotahi further submission is:**

1. Waka Kotahi NZ Transport Agency (Waka Kotahi) is a Crown entity that takes an integrated approach to transport planning, investment and delivery. The statutory objectives of Waka Kotahi are to undertake its functions in a way that contributes to an effective, efficient and safe land transport system in the public interest. Our vision is for a sustainable, multi-modal land transport system where public transport, active or shared modes are the first choice for most daily transport needs.
2. Waka Kotahi has a mandate under the Land Transport Management Act 2003 (LTMA), the Government Roothing Powers Act 1989 (GRPA), and the Government Policy Statement on Land Transport 2021/22-2030/31 (GPS) to carry out its functions in a way that delivers on the transport outcomes set by the government.
3. In the 2021-2024 National Land Transport Programme, Waka Kotahi has allocated significant investment in the Canterbury Region (including Waimakariri District) to the improvement, operation and maintenance of the state highway network, including public transport investment, walking and cycling and transport planning. In addition, Waka Kotahi is a co-funder of the local roading network. Waka Kotahi is therefore a significant investor in the infrastructure required to achieve the land use change and growth anticipated in the Proposed Timaru District Plan.
4. Overall, Waka Kotahi has an interest in the Proposed Timaru District Plan as a result of its role as a:
  - Transport investor – to maximise effective, efficient and strategic returns for New Zealand;

- Planner of land transport networks – to ensure the integration of infrastructure and land use so as to support liveable communities and the development of an effective and resilient land transport network for customers;
  - Provide for access to and the use of the land transport system – to shape smart, efficient, safe and responsible transport choices; and
  - Manager of the state highway network – to deliver efficient, safe and responsible highway solutions for customers.
5. For these reasons it is considered that Waka Kotahi has an interest which is greater than the general public.
  6. Further points are summarised in Table 1, which form the bulk of our submission.
  7. Waka Kotahi could not gain an advantage in trade competition through this submission.
  8. Waka Kotahi has serviced a copy of the further submission on the original submitter.

**We seek the following decision from the local authority:**

Amend the provisions of the Proposed Timaru District Plan as detailed in Table 1 (attached) including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this further submission. Waka Kotahi would like to be heard in support of its submission. If others make a similar submission, Waka Kotahi will consider presenting a joint case with them at a hearing.

Signature of person authorised to sign on behalf of Submitter:



Stuart Pearson  
**Senior Planner – Environmental Planning**  
Waka Kotahi NZ Transport Agency

**Table 1: Decisions Sought on the Proposed Timaru District Plan**

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be accepted or rejected:
<b>Interpretation</b>						
<b>Definitions</b>						
<b>Opuha Water Limited</b>	181.15	Definitions (new) Natural Hazards Areas	Support	The submitter seeks to include a new definition for “Natural Hazards Areas” as it is used throughout the Natural Hazards chapter.	Waka Kotahi considers including the definition for “Natural Hazard Areas” to be beneficial in providing clarity to the Natural Hazards chapter and will be helpful to understand what standards Waka Kotahi may be subject to.	The submission should be accepted.
<b>Timaru District Council</b>	42.7	(new) Well Functioning Urban Environment	Support	The submitter seeks to include a definition for “well-functioning urban environment”.	Waka Kotahi considers that it is appropriate to include a definition for well-functioning urban environment that is consistent with the National Policy Statement on Urban Development	The submission should be accepted.
<b>Energy, Infrastructure and Transport</b>						
<b>EI – Energy and Infrastructure</b>						
<b>Timaru District Council</b>	42.18	EI-P1	Support	The relief sought to recognise that infrastructure may not always need to be removed during emergency works, but may need to be relocated, repaired, upgraded, maintained, or require other necessary works.	Waka Kotahi supports the relief sought by the submitter as it allows the policy to consider alternate methods during emergency works where ‘removal’ may not be the most appropriate method.	The submission point be allowed.
<b>BP Oil, Mobil Oil New Zealand, Z Energy</b>	196.24	EI-P3	Support	The relief sought to include modified incompatible activities.	Waka Kotahi supports the requested amendments as it is agreed that both new and modified sensitive activities should be considered under this policy to ensure the effects are appropriately considered.	The submission point be allowed.
<b>TRAN – Transport</b>						
<b>Royal Forest and Bird Protection Society</b>	156.79	TRAN-P4	Oppose	The amendment to include TRAN-P4.1.c, which seeks to ensure that the policies in the Natural	It is considered that if new transport infrastructure is subject to the Natural Environment Chapter, then the appropriate policies will be considered at that stage, so no repetition is required to include it into TRAN-P4.	The submission point be rejected.

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be accepted or rejected:
				Environment Chapter can be achieved.		
<b>Hazards and Risks</b>						
<b>NH – Natural Hazards</b>						
<b>Transpower New Zealand Limited</b>	159.60	NH-O2	Support	Relief to amend the objective as follows:  <i>Risk from natural hazards to Regionally Significant Infrastructure is <u>managed by locating</u> <del>located</del> outside of high hazard areas where practicable.</i>	Waka Kotahi supports the relief sought as the proposed amendments focus on managing risk and will recognise the adverse effects of locating regionally significant infrastructure in high hazard areas while providing increased flexibility to locate such infrastructure where practicable.	The submission point be allowed.
<b>Opuha Water Limited</b>	181.46	NO-O2	Support	Relief sought to change “high hazard areas” to defined term in the PDP i.e. “High Hazard Areas”	Waka Kotahi supports the submission point as it adds clarity to the terms referenced in the Objective.	The submission should be accepted.
<b>Royal Forest and Bird Protection Society</b>	156.88	New Policy	Oppose	Submitter has sought that a new policy be included in the Natural Hazards Chapter to provide guidance for the development of Regionally Significant Infrastructure in High Hazard Areas.	There is sufficient guidance for the development of RSI in high hazard areas, additional policy guidance is considered unnecessary.	The submission point be rejected.
<b>Transpower New Zealand Ltd.</b>	159.63	NH-P11	Support	Seeks amendment to change wording of “ <i>Natural Hazard Areas</i> ” to “ <i>High Hazard Areas</i> ” further confining policy.	Waka Kotahi supports the submission point as is provides increased flexibility to locate infrastructure in high hazard areas where appropriate.	The submission should be accepted.
<b>Te Runanga o Ngai Tahu</b>	185.67	NH-P9	Oppose	Seeks to remove clause 1 and amend clause 2 remove provision for the Crown and Council to undertake Natural Hazard protection where effects are appropriately mitigated.	Waka Kotahi considers that the amendments would result in onerous requirements that will restrict the ability of Waka Kotahi to respond and protect its infrastructure against natural hazards.	The submission should be rejected.

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be accepted or rejected:
<b>Historical and Cultural Values</b>						
<b>TREES – Notable Trees</b>						
<b>The Tree Council</b>	220.1	TREE-R3	Oppose	Submitter seeks to create a prohibited activity status for the storage of materials in the root zone of a protected tree.	The proposed prohibited activity status could place overly restrictive restrictions for the storage of materials. It is considered that if the effects of storing material in the root protection zone are minor or can be mitigated, then a consenting pathway should be provided for this.	The submission should be rejected.
<b>Natural Environment Values</b>						
<b>ECO – Ecosystems and Indigenous Biodiversity</b>						
<b>Royal Forest and Bird Protection Society</b>	156.10	ECO-P2	Oppose	The submitter seeks to delete that indigenous vegetation clearance in significant natural areas shall not be provided for in relation to public roads.	The proposed policy currently provides for clearance of indigenous vegetation in significant natural areas for roads when it is for health and wellbeing of people and communities. There are many instances where the safety of the state highway requires vegetation clearance to avoid potential risks to road users or it is required to get the road re-opened. By excluding public roads from this policy, it could result in onerous requirements to ensure the safety of the roading network can be maintained. Therefore, Waka Kotahi opposes the submission.	The submission point be rejected.
<b>NATC – Natural Character</b>						
<b>Road Metals Company Limited</b>	169.23	NATC-R1	Support	The submitter seeks to amend the rule to include a wider range of activities associated with roads by including 'their associated bridges, stormwater infrastructure and signage'.	Waka Kotahi supports the amendment sought as it will provide for the ongoing maintenance of the state highway network in relation to vegetation clearance in riparian margins.	The submission should be accepted.
<b>Subdivision</b>						
<b>SUB - Subdivision</b>						

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be accepted or rejected:
<b>Kāinga Ora</b>	229.52	New SUB-RX	Support	The submitter seeks a new permitted activity rule for subdivision in accordance with an existing land use consent.	Waka Kotahi is generally supportive of this new SUB-R but seeks that an amendment is made to the notification clause as follows:  SUB-R(NEW-A)  Notification:  Any application arising from SUB-R (NEW-A) shall not be subject to public or limited notification and shall be processed on a non-notified basis.  <u>Where a subdivision requires access to a State Highway, limited notification shall only be to the New Zealand Transport Agency (absent its written approval).</u>	Accept submission point with amendments.
<b>Kāinga Ora</b>	229.53	New SUB-R	Support	The submitter seeks a new permitted activity for vacant lot subdivision where it can be demonstrated that the proposed lots are able to accommodate a residential unit that is of the size, scale and location that is anticipated for the zone	Waka Kotahi is generally supportive of this new SUB-R but considers that it should only be permitted only in circumstances where access would be from the local road and not the state highway. It is also recommended that the following notification clause be included in these instances:  <u>Where a subdivision seeks access to a State Highway, limited notification shall only be to the New Zealand Transport Agency (absent its written approval).</u>	Accept submission point with amendments.
<b>KiwiRail Holdings Limited</b>	187.66	SUB-R3	Support	The submitter is seeking relief to SUB-R3.13 to recognize reverse sensitivity effects on existing land uses.	Waka Kotahi supports the inclusion of reverse sensitivity as a matter of discretion, as this will recognise reverse sensitivity effects on land use, such as existing critical infrastructure.	The submission should be accepted.
<b>Rooney Holdings Limited</b>	174.57	SUB-S6	Oppose	Submitter seeks an amendment to SUB-S6 Vehicular Access so that clause 2 does not apply to existing vehicular crossings, and instead only new or additional crossings.	The submission is opposed by Waka Kotahi as it is considered important that existing vehicle access is considered to ensure that it is appropriate for the subdivision. There are many instances where existing vehicle crossings have deficiencies that do not meet the standards subject to TRAN-R4. The subdivision process	The submission point be rejected.

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be accepted or rejected:
					may be the only appropriate mechanism to ensure that safe and efficient vehicle access can be provided.	
<b>General District-Wide Matters</b>						
<b>NOISE – Noise</b>						
<b>Rooney Holdings Limited</b>	174.72	NOISE-R9	Oppose	The submitter is seeking that alterations to existing buildings should not be considered under NOISE-R9.	Alterations to buildings can result in noise sensitive areas being exposed to noise effects, which can have an adverse effect on human health. To ensure that any alteration or extension to a building appropriately addresses the effects related to noise, it should be subject to NOISE-R9. Therefore, Waka Kotahi opposes the submission.	The submission should be rejected.
<b>Kāinga Ora</b>	229.59	NOISE-R9	Oppose	The submitter is seeking the deletion of the 40m and 80m distances in relation to the state highway, which require new buildings or alterations to existing buildings used by noise sensitive activities to address noise effects.	Waka Kotahi considers that NOISE-R9 and associated NOISE-S3 are the appropriate mechanism within the District Plan to address and manage human health effects related to noise which can occur from long-term exposure to noise from the state highway. If the rule is deleted, then there is no current reasonable alternative to address noise from the state highway for new buildings or alterations to existing buildings.	The submission should be rejected.
<b>Kāinga Ora</b>	229.60	NOISE-S3	Oppose	The submitter is seeking the deletion of the 40m and 80m distances in relation to the state highway where acoustic insulation is required for new buildings or alterations to existing buildings used by noise sensitive activities to address noise effects.	Waka Kotahi considers that NOISE-S3 and associated NOISE-R9 are the appropriate mechanism within the District Plan to address and manage human health effects related to noise which can occur from long-term exposure to noise from the state highway. If the standard is deleted, then there is no current reasonable alternative to address noise from the state highway for new buildings or alterations to existing buildings.	The submission should be rejected.
<b>SIGN – Signs</b>						

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be accepted or rejected:
<b>Go Media Ltd</b>	18.2	SIGN-P2	Oppose	The submitter is seeking to remove reference to digital signs from this policy.	Waka Kotahi considers that digital signs include a number of elements that are not shared by static signs, such as changing of images, transition times, etc, that are broadly captured through the current proposed wording in this policy. Therefore, the policy should be retained as notified to ensure it appropriately captures digital signs.	The submission should be rejected.
<b>Out of Home Media Association of Aotearoa</b>	188.6	SIGN-P3	Oppose	The submitter is seeking amendments to the off-site signage policy so that they are provided for rather than avoided, while ensuring they manage effects.	It is considered that avoiding off-site commercial signs should be recognised in this policy. The subsequent rules that relate to this policy appropriately manage off-site signs within the district as a non-complying activity. Therefore, Waka Kotahi opposes the submission.	The submission should be rejected.
<b>Go Media Ltd</b>	18.5	SIGN-S2	Oppose	The submitter is seeking that dwell times should be reduced to 8 seconds, illumination levels shall not exceed 5000 candelas per square metre, and the deletion of SIGN-S2.8.	<p>Waka Kotahi considers that the dwell times for any illuminated, moving, flashing and digital sign should not be reduced to 8 seconds for a permitted activity. Setting a higher threshold for dwell time, such as 30 seconds, is appropriate and if any reduction of dwell time is sought then it should be subject to a resource consent to ensure adverse effects are addressed.</p> <p>For similar reasons above, illumination should be set at a lower maximum threshold as a permitted activity. Any request to increase the illumination levels should be subject to a resource consent to ensure adverse effects are addressed.</p> <p>Lastly, Waka Kotahi is not opposed to illuminated or digital signs adjacent to the state highway if they are in urban environments with appropriate controls and where the effects are appropriately addressed. However, Waka Kotahi is not supportive of moving or flashing signs as these can have adverse safety effects to motorists and should not be provided for adjacent to the state highway.</p>	The submission should be rejected.

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be accepted or rejected:
<b>TEMP – Temporary Activities</b>						
<b>New Zealand Defense Force</b>	151.5	TEMP-P2	Oppose	Submitter seeks the deletion of temporary activities adversely affecting the transport network.  Seeks transport effects to be addressed through the transport chapter.	Waka Kotahi opposes the submission point, as clause 2 and 3 control the nature and scale of temporary activities. Consideration within the TEMP chapter helps improve clarity of the considerations such activities should be subject to.	The submission point be rejected.
<b>Part 3 – Area specific matters</b>						
<b>Zones</b>						
<b>RURZ – Rural Zones</b>						
<b>GRUZ – General Rural Zone</b>						
<b>Federated Farmers</b>	182.200	GRUZ-R12 Rural produce retail	Oppose	Submitter seeks relief to amend the rule to reduce the set back area for rural produce retail from 10m down to 8m, where it is deemed safe.	Waka Kotahi considers that the proposed amended wording of 'where deemed safe' is open to interpretation and is not direct enough as a rule to manage this activity. The current proposed setback of 10m is sufficient and any reduction to this should be subject to the resource consent process where safety is then considered.	The submission should be rejected.
<b>Rezone</b>						
<b>George and Rachel Harper</b>	109.1	Planning Maps	Oppose	The submitter seeks to rezone land in Geraldine to the west and east of Main North Road / State Highway 79 from General Rural Zone to General Residential Zone.	Waka Kotahi considers that the rezoning request would result in sprawl, does not provide for a consolidated urban form and would not achieve positive transport outcomes that promote walking and cycling. If the request for rezoning was to proceed, then assessments and supporting documents should be provided to determine whether the land is appropriate for the rezoning along with any mitigation that may need to be provided, such as upgrades to the transport system.	The submission should be rejected.

**Annexure B: A list of names and addresses of persons to be served with this notice of appeal**

<b>Submitter Name</b>	<b>Contact Name</b>	<b>Postal Address</b>	<b>Email</b>
Alliance Group Limited	Mitchel Daysh Limited – Doyle Richardson	PO Box 489 Dunedin 9054	doyle.richardson@mitchelldaysh.co.nz
Fonterra Limited	Chapman Tripp – Suzanne O'Rourke	Chapman Tripp PO Box 2510 Christchurch 8140	rachel.robilliard@chapmantripp.com ben.williams@chapmantripp.com
Foodstuffs	Saunders & Co – Chris Fowler	131 Victoria Street Christchurch 8001	chris.fowler@saunders.co.nz shona.walter@saunders.co.nz
GJH Rooney	Rooney Group Limited - Nathan Hole	4A Williams Street Waimate 7960	nathan.hole@rooneygroup.co.nz
Kainga Ora	Mel Rountree	PO Box 74598 Greenlane Auckland 1546	developmentplanning@kaingaora.govt.nz
KiwiRail Holdings Limited	KiwiRail Holdings Ltd - Sheena McGuire	2 Bunny Street Pipitea Wellington 6011	sheena.mcguire@kiwirail.co.nz
NZ Frost Fans Limited	James Witham – James Withell	1429 Omahau Road	NZ Frost Fans Limited
PrimePort Limited	Novo Group Limited - Kim Seaton	PO Box 365 Christchurch 8140	kim@novogroup.co.nz
Rooney Earthmoving Limited	Rooney Group Limited - Nathan Hole	4A Williams Street Waimate 7960	nathan.hole@rooneygroup.co.nz

Rooney Farms Ltd	Rooney Group Limited - Nathan Hole	4A Williams Street Waimate 7960	nathan.hole@rooneygroup.co.nz
Rooney Group Ltd	Rooney Group Limited - Nathan Hole	4A Williams Street Waimate 7960	nathan.hole@rooneygroup.co.nz
Rooney Holdings Limited	Rooney Group Limited - Nathan Hole	4A Williams Street Waimate 7960	nathan.hole@rooneygroup.co.nz
Silver Fern Farms	Mitchell Daysh Limited - Steve Tuck	PO Box 489 Dunedin 9054	steve.tuck@mitchelldaysh.co.nz
Te Rūnanga o Ngāi Tahu	Trudy Heath	15 Show Place Addington Christchurch 8024	rachael.pull@ngaitahu.iwi.nz TTW@ngaitahu.iwi.nz
Timaru Developments Limited	Rooney Group Limited - Nathan Hole	4A Williams Street Waimate 7960	nathan.hole@rooneygroup.co.nz

**Annexure C: A copy of the relevant parts of the decision**