Proposed Waitaki District Plan

Summary of Submissions

Listed by Submitter/Submitter number

This document contains a summary of decisions requested by persons making submissions on the Proposed Waitaki District Plan in accordance with clause 8 of Schedule 1 of the Resource Management Act 1991.

IMPORTANT NOTE: ***Some provisions in this chapter have been withdrawn from the Proposed Waitaki District Plan (PDP). Further Submissions will not be accepted on withdrawn provisions. Please click here for further information on the topics that have been withdrawn from the PDP. You can also refer to the Exemptions Version of the PDP to confirm which specific provisions are withdrawn from this chapter.***

Notes:

- Where submissions are unclear, the summary of decisions requested contain the word '*inferred*'.
- This summary is not a substitute for reading the full submission. If you think your interests may be affected, please review the full submission online here.
- Submission numbers are unique identifiers and must be stated when making a further submission.
- Where specific wording changes have been requested in submissions, those changes are shown as:
  Underlined = new wording
  ~~Strikethrough~~ = deletions

How to Make a Further Submission

Paper copies of the Form 6 are available at Council offices and libraries or you can download a copy from here.
You can submit your completed Form 6 in any of the following ways:

- Click here to use the online Form 6 for your further submission
- Download and email to: planreview@waitaki.govt.nz
- Print and post to: Planning Department, Waitaki District Council, Private Bag 50058, Ōamaru, 9444
- In person: You can drop off a completed Form 6 at Council offices in Ōamaru or Palmerston (paper copies are available at these locations)

IMPORTANT REQUIREMENT WHEN MAKING A FURTHER SUBMISSION

If you make a further submission, you must also send a copy to the person who made the original submission within five (5) working days of lodging it with Council.

Submitter contact details are available here.

Further Submissions close at 5pm on 18 May 2026.

Disclaimer: This summary of submissions has been prepared and published in accordance with the Resource Management Act to assist the public in understanding the points raised by submitters. Waitaki District Council has used its best endeavours to accurately summarise the relief sought in the submissions, however, we cannot guarantee the accuracy or completeness of the information provided in this document. Users are advised to take specific independent professional advice before taking any action as a result of information contained in this summary. Please note that all original submissions and names of submitters are publicly available on the Council website. Submitters should read the full submission for themselves.

Sub No.	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary
290.1	Philip and Becky Wilson	Strategic Direction	General	Support	In general, support of Strategic Direction chapter, in particular the historical and cultural identity and values, and the rural areas. [Refer to original submission for full reasons]	Retain as notified
290.2	Philip and Becky Wilson	Definitions	Agricultural intensification in relation to the Ecosystems and Indigenous Biodiversity c	Oppose	[Refer to original submission for full reasons]	[Refer to original submission for full relief sought] Seeks to add a new definition as follows: ~~Agricultural intensification~~: High rate irrigation: in relation to the ~~Ecosystems and Indigenous Biodiversity chapter, Natural Features and Landscapes chapter, and the~~ Sites and Areas of Significance to Māori chapter where rock art is identified, means change from non-irrigated primary production (including plantation forestry) to irrigated agricultural production that is irrigated to a depth more than 10mm, or not controlled by a Freshwater Farm Plan on land that is not currently irrigated as of 1st March 2025. ~~It also includes any change from irrigated crop and seed production to dairy farming.~~
290.3	Philip and Becky Wilson	Definitions	Commercial activity NPS means any activity trading in goods, equipment or services. It	Oppose	Considers the definition captures not-for-profit and charity trading unlikely to be of a scale to cause significant adverse effects.	Seeks to amend as follows: Commercial activities: means any activity trading in goods, equipment or services for profit....
290.4	Philip and Becky Wilson	Definitions	Farm building means a building used for the exercise of farming activities and excludes:	Oppose	Considers the term 'primary production activities' should be used consistently in the PDP.	Seeks to amend as follows: means a building used for the exercise of ~~farming~~ primary production activities and excludes:
290.5	Philip and Becky Wilson	Definitions	Farm track An un-sealed private track serving permitted agricultural or forestry activit	Oppose	Considers that the definition of farm track should also include those serving consented activities and that sealed farm tracks offer environmental benefits such as reducing sediment loss and controlling dust. Considers that the term 'primary production activity should be used as there is no definition for 'agricultural' activity.	Seeks to amend as follows: An un-sealed or sealed private track serving ~~permitted agricultural or forestry~~primary production activities.
290.6	Philip and Becky Wilson	Definitions	Hazardous facility means a facility or activity that involves the use, storage or dispos	Oppose	No specific reason given.	Seeks to retain as notified
290.7	Philip and Becky Wilson	Definitions	Heritage professional means a person with a degree or recognised post-graduate qualifica	Amend	Considers the phrase 'recognised postgraduate qualification' too vague, as it doesn't specify who recognises it or how.	Seeks to amend as follows: means a person with a degree or ~~recognised~~ post-graduate qualification in a field related to heritage conservation or management..
290.8	Philip and Becky Wilson	Definitions	Identified taoka has the same meaning as in the	Oppose	Considers that there should be a schedule or list of acknowledged or identified taoka as the PDP's use of the term 'taoka' is	Seeks to add a schedule of identified taoka and acknowledged taoka into the PDP. Remove provisions for taoka until a list is provided and provisions can be submitted on.

			National Policy Statement on Indigenous		ambiguous, making it unclear whether references are to identified or acknowledged taoka.	
290.9	Philip and Becky Wilson	Definitions	Intensive outdoor primary production means primary production activities involving the	Oppose	Considers that the definition is vague and open to subjective interpretation and that the terms 'regular' and 'substantially provided other than from the site concerned' should be defined.	Seeks to amend as follows: Intensive outdoor primary production means primary production activities involving the keeping or rearing of livestock, or commercial aquaculture, where the ~~regular~~majority ~~substantially~~provided other than from the site concerned... It excludes the following: ... e. Primary production activities when a drought is declared
290.10	Philip and Becky Wilson	Definitions	Pervious surface means any part of a site which is grassed or planted in trees or shrubs	Oppose	Considers that other surfaces may be pervious such as stones or other types of garden.	Seeks to amend as follows: Pervious surface means any part of a site which ~~is grassed or planted in trees or shrubs and~~is capable of absorbing water including soft landscaping, grass and planted trees or shrubs. It does not include impervious surfaces or any area which: ...
290.11	Philip and Becky Wilson	Definitions	Potentially high-impact industrial activities means industrial activities that because o	Oppose	Considers the definition to be broad, unintentionally including hunting, home kill, and septic tanks, which are low-impact and may duplicate regional consent requirements. Additional consent burdens may discourage the development of quality housing and affordable food production.	Seeks to amend as follows: ... 2.commercial and non-pest species meat processing, or ~~any~~associated processing of meat and meat by-products, or co-products; ... 10. storage and disposal of sewage, septic tank sludge, or refuse other than at the source;
290.12	Philip and Becky Wilson	Definitions	Recreational activity means the use of land and/or buildings for the purpose of active o	Oppose	Considers that the definition is circular as it uses 'recreation' within the definition itself.	Seeks to amend as follows: Recreational activity: means the use of land and/or buildings for the purpose of active or passive enjoyment of organised sports, ~~recreation~~or entertainment. Excludes any recreational activity within the meaning of residential activity.
290.13	Philip and Becky Wilson	Definitions	Regionally significant infrastructure is: strategic	Support	No specific reasons given	Retain as notified

			land transport network and arterial			
290.14	Philip and Becky Wilson	Definitions	Repair workshop means the mechanical repair and servicing of motor vehicles (includes mo	Oppose	Considers that if the definition was applied outside of the Local Centre Zone, it could include farm and residential workshops.	Retain as notified - but only in the LCZ. If used in other zones, seeks to amend as follows: Repair workshop means the commercial mechanical repair and servicing of motor vehicles (includes motorcycles, caravans, boat motors, trailers) inside a building.
290.15	Philip and Becky Wilson	Definitions	Sensitive environment area of land contained within any of the following areas: Coa	Oppose	Considers that the district plan has no jurisdiction on airspace and that the correct term for the height of land above sea level is 'elevation'.	Seeks to delete clause (11) or amend as follows: 11. Above 900 metres in ~~altitude~~elevation
290.16	Philip and Becky Wilson	Definitions	Riparian margin means: for land in the General Rural Zone, all landward property adjo	Oppose	Considers the definition is inconsistent with other measures under the RMA which manage similar sediment issues such as the regulations controlling intensive winter grazing which have a 5m buffer.	Seeks to amend as follows: 1. ~~for land in the General Rural Zone~~, all landward property adjoining and within ~~20~~ 5 metres of the boundary of the bed of a river or lake, or of the edge of a wetland; ~~and~~ ~~2. for land outside the General Rural Zone, all landward property adjoining and within 10 metres of the boundary of the bed of a river or lake, or of the edge of a wetland.~~
290.17	Philip and Becky Wilson	Definitions	Temporary activity means activities and their ancillary buildings and structures that ar	Support	Supports the definition but considers that the undefined term 'helicopter' could be interpreted too broadly and include anything from a drone, gyrocopter through to high impact military helicopters which require support services. Considers that the term 'aircraft' is appropriate to use as it encompasses helicopters, drones, gyrocopters, and fixed-wing aircraft.	Seeks to amend clause (6) as follows: 6. temporary ~~helicopter~~aircraft take-offs and landings; and
290.18	Philip and Becky Wilson	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Considers that the term 'chemical' [clause (6)] is too broad and could include harmless substances like water or atmospheric gases and that requiring proof of a change to the hydrological balance is impractical, as baseline data is not generally available. Considers that many of the listed effects may occur accidentally or naturally, and the wording should allow for such occurrences. Considers it ambiguous whether cushionfield [clause (8)] is the competitor or the outcompeted species referred to. Also considers the reference to mob-stocking [clause (10)] is unclear and potentially contradictory, as grazing is excluded from the definition and is often beneficial to ecosystems - suggests using the term 'pugging' as an alternative. Considers that the term 'established farming practice' lacks a clear method or explanation for how it is determined. Considers that restrictions on indigenous vegetation removal may disincentivise new plantings and will be more expensive to establish than exotic species (which also offer better returns under the Emissions Trading Scheme) and would also limit access	Seeks to amend as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation established as at 1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate: 1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of ~~chemicals~~harmful substances including herbicide; 7. burning; 8.~~the deliberate~~application of water, fertiliser or oversowing where

					to non-threatened indigenous species like manuka, which are valuable for low-cost home heating.	it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion, ~~including dryland cushionfield species;~~ 9.~~the~~drainage of mapped wetlands or lakes; ~~10. mob-stocking; and~~ 11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site;~~ b. walking; c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood
290.19	Philip and Becky Wilson	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried (not mined). Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	Seeks to amend as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones,~~and a prescribed substance within the meaning of the Atomic Energy Act 1945
290.20	Philip and Becky Wilson	Mana whenua	General	Support	Support in part [Refer to original submission for full reasons]	Seeks to retain as notified
290.21	Philip and Becky Wilson	Mana whenua	Consultation with mana whenua	Support	Supports in part. Support is expressed for clearly identifying when mana whenua may be affected by a proposal. Considers that where iwi consultation is encouraged, costs should be recoverable and that for matters of national importance (including mana whenua, historic heritage, natural features, ecosystems, and natural hazard), costs should be publicly funded, not charged to individual applicants. Considers that specifying applicant fees is outside the scope of the PDP and that consultation processes should be guided by memorandums of understanding or similar, as recommended in the SASM Section 32 report.	Seeks to remove reference to applicants being charged fees for consultation and for a memorandum of understanding to be consulted on prior to further submissions.
290.22	Philip and Becky Wilson	Natural Hazards	NH-O1 Natural hazard risk The risks from natural hazards, including the effects of climate	Support	Supports with modifications to include proportionality of the avoidance and mitigation to the level of risk.	Seeks to amend as follows: The impact on people, property and the environment from the risks of natural hazards and the effects of climate change are recognised, avoided or mitigated relative to the level of risk.
290.23	Philip and Becky Wilson	Natural Hazards	NH-P1 Identification of natural hazard areas As information becomes available, identify an	Support	Support in part with modification to better focus the policy.	Seeks to amend as follows: As information becomes available, identify and map land that ~~may~~is known to be subject to natural hazards, including taking into account the effects of climate change.
290.24	Philip and Becky Wilson	Natural Hazards	NH-P2 Risk based approach Avoid subdivision, use and	Support	No specific reasons given	Retain as notified

			development in areas where natural			
290.25	Philip and Becky Wilson	Natural Hazards	NH-P3 Critical facilities and regionally significant infrastructure Avoid locating critica	Support	No specific reasons given	Retain as notified
290.26	Philip and Becky Wilson	Natural Hazards	NH-P4 Natural protection features Encourage the use, protection, maintenance and enhanc	Support	Support with recommendation to expand scope to explicitly require engineering solutions where natural protection features are unsuitable, particularly in cases involving the protection of infrastructure, people, and property, where more reliable methods may be necessary.	Seeks to amend as follows: Encourage the use, protection, maintenance and enhancement of natural features, buffers and systems, such as wetlands and vegetation, which provide protection from natural hazard risk where engineering solutions are not required to mitigate risk to people, property and infrastructure.
290.27	Philip and Becky Wilson	Natural Hazards	NH-P13 Other natural hazard awareness overlays Encourage proposals for subdivision, use an	Support	Supports in part but considers an assessment should not be required in all cases, especially when there's no evidence that a specific use is at risk from an awareness overlay. Considers there is no clear definition of what constitutes an 'acceptable level' of risk and who determines it.	Seeks to amend as follows: Encourage proposals for subdivision, ~~use~~and development in a natural hazard awareness overlay to undertake an assessment of natural hazard risk and incorporate any methods to reduce or mitigate the risk. ~~to an acceptable level.~~ Alternatively, if 'use' is to remain, seeks to amend as follows: Encourage proposals for subdivision, use and development in a natural hazard awareness overlay to ~~undertake an assessment~~t consider the effects of natural hazard risk and incorporate methods to reduce or mitigate the risk ~~to an acceptable level.~~
290.28	Philip and Becky Wilson	Natural Hazards	NH-R1 Buildings, structures and fences in the Otago Flood Assessment Overlay All zones	Oppose	Considers the definition should acknowledge that other farm structures, like poles or irrigation infrastructure, are not more flood-prone or hazardous than those already listed, and may even mitigate risk. Considers the term 'suitably qualified and experienced professional' should be clarified.	Seeks to amend as follows: PER-1 The building or structure is: ... 3. an unenclosed building without a floor or with a concrete floor; or ... 6. a pole; or 7. irrigation or stockwater infrastructure Seeks clarification on the term 'suitably qualified and experienced professional'
290.29	Philip and Becky Wilson	Natural Hazards	NH-R2 Buildings, structures and fences in the Canterbury Flood Assessment Overlay All z	Oppose	Considers the definition should acknowledge that other farm structures, like poles or irrigation infrastructure, are not more flood-prone or hazardous than those already listed, and may even mitigate risk.	Seeks to add provision for other floors in buildings and structures like poles and water infrastructure.

290.30	Philip and Becky Wilson	Natural Hazards	NH-R4 Earthworks excluding land disturbance in all Flood Assessment Overlays All zones	Support	Supports with recommendation to permit the building of tracks.	Seeks to amend as follows: PER-3 The earthworks are for the construction of a farm track.
290.31	Philip and Becky Wilson	Natural Hazards	NH-R6 Land use activities in the Canterbury Flood Assessment Overlay, the Otago Flood Assessme	Support	Supports with recommendation to add other uses which are compatible with the objectives and policies of the Natural Hazards chapter such as airstrips and helicopter take-off and landing areas.	Seeks to amend as follows: 5. Aeroplane airstrips and helicopter takeoff and landing areas.
290.32	Philip and Becky Wilson	Natural Hazards	NH-P5 Site specific assessment/investigation A risk assessment will be required for subdiv	Support	No specific reasons given	Retain as notified
290.33	Philip and Becky Wilson	Natural Hazards	NH-P6 Canterbury Flood Assessment Overlay Except as provided for in NH-P3, avoid subdiv	Support	No specific reasons given	Retain as notified
290.34	Philip and Becky Wilson	Natural Hazards	NH-P7 Otago Flood Assessment Overlay and Waitaki River Floodplain Assessment Overlay Ex	Support	No specific reasons given	Retain as notified
290.35	Philip and Becky Wilson	Natural Hazards	NH-P11 Liquefaction Assessment Overlay Provide for subdivision in the Liquefaction Assessm	Support	No specific reasons given	Retain as notified
290.36	Philip and Becky Wilson	Natural Hazards	NH-P12 Wildfire – subdivision and land use Ensure that subdivision and land use in area	Support	No specific reasons given	Retain as notified
290.37	Philip and Becky Wilson	Natural Hazards	NH-R3 Buildings, structures and fences in the Waitaki River Floodplain Assessment Overlay	Oppose	Considers the definition should acknowledge that other farm structures, like poles or irrigation infrastructure, are not more flood-prone or hazardous than those already listed and may even mitigate risk.	Seeks to add provision for other floors in buildings and structures like poles and water infrastructure.
290.38	Philip and Becky Wilson	Natural Hazards	NH-R13 Wildfire – woodlots, shelterbelts, plantation forestry and buildings All zones	Amend	Supports with modification to encourage the planting of low flammability plants, particularly near houses.	Seeks to amend as follows: PER-4 The woodlot, shelterbelt or plantation forestry is a species listed in the FENZ Low Flammability Plant Directory.
290.39	Philip and Becky Wilson	Hazardous Substances	General	Support	Support for chapter and definitions	Retain as notified

290.40	Philip and Becky Wilson	Historic Heritage	HH-O1 Protection of historic heritage The District's historic heritage is recognised, main	Support	No specific reasons given	Retain as notified
290.41	Philip and Becky Wilson	Historic Heritage	HH-O2 Use and adaptive re-use of historic heritage Historic Heritage Items and their herit	Support	Supports noting that primary production is sympathetic re-use of the heritage settings where existing.	Retain as notified
290.42	Philip and Becky Wilson	Historic Heritage	HH-P1 Recognise historic heritage Identify Historic Heritage Items and their associated	Support	Support with recommendation to recognise landowners' interests and consent in heritage protection. Considers heritage protection to be more effective when landowners are constructively engaged and permission is required for listing.	Seeks to amend as follows: With landowner permission, identify Historic Heritage Items and their associated heritage settings throughout the Waitaki district that warrant protection in SCHED2 – Historic Heritage Items, and are significant in terms of one or more of the following values: ...
290.43	Philip and Becky Wilson	Historic Heritage	HH-P2 Historic heritage scheduling Classify Historic Heritage Items and their associate	Support	No specific reasons given	Retain as notified
290.44	Philip and Becky Wilson	Historic Heritage	HH-P3 Benefits of active use, adaptive re-use, and protection of historic heritage Recogni	Support	Support in the context of re-use being primary production.	Retain as notified
290.45	Philip and Becky Wilson	Historic Heritage	HH-P4 Heritage maintenance Enable the use and heritage maintenance of the Historic Heri	Support	Support in the context of re-use being primary production.	Retain as notified
290.46	Philip and Becky Wilson	Historic Heritage	HH-P5 Modern service attachments Enable attachments to Historic Heritage Items included	Support	No specific reasons given	Retain as notified
290.47	Philip and Becky Wilson	Historic Heritage	HH-P6 Heritage restoration Control the heritage restoration of Historic Heritage Items	Support	No specific reasons given	Retain as notified
290.48	Philip and Becky Wilson	Historic Heritage	HH-P7 Retaining historic heritage – earthquake and flooding resiliency Encourage earthquak	Support	No specific reasons given	Retain as notified
290.49	Philip and Becky Wilson	Historic Heritage	HH-P8 Protecting historic heritage from inappropriate heritage alterations Provide for	Support	No specific reasons given	Retain as notified
290.50	Philip and Becky Wilson	Historic Heritage	HH-P9 Relocation of Historic Heritage Items within or beyond their heritage setting Allow	Support	No specific reasons given	Retain as notified

290.51	Philip and Becky Wilson	Historic Heritage	HH-P10 Demolition or destruction of Category B Historic Heritage Items Only allow the d	Support	No specific reasons given	Retain as notified
290.52	Philip and Becky Wilson	Historic Heritage	HH-P11 Demolition or destruction of Category A Historic Heritage Items Avoid the demolitio	Support	No specific reasons given	Retain as notified
290.53	Philip and Becky Wilson	Historic Heritage	HH-P12 Buildings and structures within heritage settings Only allow new buildings and s	Support	No specific reasons given	Retain as notified
290.54	Philip and Becky Wilson	Historic Heritage	HH-P13 Subdivision of sites containing Historic Heritage Items Only allow subdivision o	Support	No specific reasons given	Retain as notified
290.55	Philip and Becky Wilson	Historic Heritage	HH-P14 Planning incentives to encourage the sustainable use of Historic Heritage Items Ass	Support	No specific reasons given	Retain as notified
290.56	Philip and Becky Wilson	Historic Heritage	HH-P15 Future consideration of historic heritage Council continues to investigate the iden	Oppose	Considers this to be a council matter, not a planning matter as future councils may have different priorities and should not be bound by past policies or required to undertake a plan change between cycles.	Seeks to delete the policy.
290.57	Philip and Becky Wilson	Historic Heritage	HH-R1 Heritage maintenance on Historic Heritage Items listed in SCHED2 – Historic Heritage Ite	Support	No specific reasons given	Retain as notified
290.58	Philip and Becky Wilson	Historic Heritage	HH-R2 Animal grazing on sites and their heritage setting identified in SCHED2 – Historic Herit	Support	Supports in the context of a working farm.	Retain as notified
290.59	Philip and Becky Wilson	Historic Heritage	HH-R3 Earthworks within the heritage setting of a Historic Heritage Item listed in SCHED2 – Hi	Support	Supports in the context of a working farm.	Retain as notified
290.60	Philip and Becky Wilson	Historic Heritage	HH-R5 New buildings, structures and signs, or alterations to an existing building or structure	Support	Support with suggested modifications to reflect the practical needs of heritage items located in a rural context where structures like fences and pipes are necessary for primary production.	Seeks to amend as follows: PER 1 Any new building, structure or sign is: … <u>5. is a post and wire or post and rail fence; or</u> <u>6. is irrigation or stock water infrastructure; or</u>

290.61	Philip and Becky Wilson	Historic Heritage	HH-R12 Relocation of a Category B Historic Heritage Item listed in SCHED2 – Historic Heritage	Support	No specific reason given	Retain as notified
290.62	Philip and Becky Wilson	Historic Heritage	HH-R13 Relocation of a Category A Historic Heritage Item listed in SCHED2 – Historic Heritage	Oppose	Considers that the relocation of heritage items can sometimes improve their condition or address health and safety risks (for example the Herbert War Memorial) and that making consent too difficult may increase the risk of demolition by neglect.	Seeks to amend HH-R13 to a discretionary activity.
290.63	Philip and Becky Wilson	Historic Heritage	HH-R14 Any demolition of a Historic Heritage Item listed in SCHED2 – Historic Heritage Items	Oppose	Considers this to be a council matter, not a planning matter as future councils may have different priorities and should not be bound by past policies or required to undertake a plan change between cycles.	Seeks to delete HH-M1
290.64	Philip and Becky Wilson	Historic Heritage	HH-R14 Any demolition of a Historic Heritage Item listed in SCHED2 – Historic Heritage Items	Support	Supports the intent but considers this to be a council matter rather than a planning matter.	Seeks to deleteHH-M4
290.65	Philip and Becky Wilson	Notable Trees	General	Support	Support for the chapter	Retain as notified
290.66	Philip and Becky Wilson	Notable Trees	TREE-P5 Other trimming and pruning of Notable Trees Provide for any other trimming of N	Support	Support with modifications as not possible to confirm long-term impacts of trimming on tree health or lifespan in advance. Considers 'likelihood 'is a more practical measure than certainty. Also considers that trimming may alter a tree's natural form, especially when removing diseased or hazardous limbs and that TREE-S1 should also be considered regarding the retention of natural form.	Seeks to amend as follows: Provide for any other trimming of Notable Trees where it can be demonstrated that the works do not: 1.likely compromise the long-term health of the Notable Tree; 2. compromise the identified values of the Notable Tree, listed in SCHED4 - Notable Trees; 3.likely reduce the natural life of the Notable Tree; 4. increase the risk of the Notable Tree being subject to wind damage; and 5. impact the natural shape and form of the Notable Tree more than necessary.
290.67	Philip and Becky Wilson	Notable Trees	TREE-S1 Trimming of Notable Trees All zones The maximum branch diameter being trimm	Support	No specific reason given	Retain as notified
290.68	Philip and Becky Wilson	Notable Trees	TREE-S2 Trimming or removal of Notable Trees posing a threat to people or property All	Support	No specific reason given	Retain as notified
290.69	Philip and Becky Wilson	Notable Trees	TREE-S3 Trimming or removal of Notable Trees All zones The works are undertaken or	Support	No specific reason given	Retain as notified
290.70	Philip and Becky Wilson	Notable Trees	TREE-R1 Maintenance of the ground within the root	Support	No specific reason given	Retain as notified

			protection area of a Notable Tree All			
290.71	Philip and Becky Wilson	Notable Trees	TREE-R2 Trimming or pruning of a Notable Tree All zones Activity status: Permitted	Support	No specific reason given	Retain as notified
290.72	Philip and Becky Wilson	Notable Trees	TREE-R3 Removal of a Notable Tree All zones Activity status: Permitted Where: PER-1	Support	No specific reason given	Retain as notified
290.73	Philip and Becky Wilson	Sites and Areas of Significance to Maori	General	Support	[refer to original submission for full reasons]	[Refer to original submission for relief sought]
290.74	Philip and Becky Wilson	SCHED5 – Schedule of Sites and Areas of Significance to Maori	ID ref Name Description and Values SASM007 Waitaki River The nam	Oppose	Oppose in part Schedule 5. The property is encumbered with the following SASM overlays: SASM013 [refer to original submission for full reasons]	[Refer to original submission for relief sought]
290.75	Philip and Becky Wilson	Sites and Areas of Significance to Maori	General	Oppose	Considers that Freshwater Farm Plans are set to become the primary planning tool for farmland and aim to streamline consent processes by managing farming effects within a single plan under the RMA, and these may also incorporate SASM values. Considers that Freshwater Farm Plans retain a level playing field because the landowner is obligated to have it certified to carry out activities, while the iwi are obligated to consult with the landowner to advise on protection of their significant sites. Both obligations require good faith and genuine relationships rather than expensive consent burdens involving the district council.	Seeks to reduce consent burdens on farmers and allow them to plan directly with iwi in good faith through Freshwater Farm Plans.
290.76	Philip and Becky Wilson	Mana whenua	General	Oppose	Considers there to be a conflict of interest as the plan states that Aukaha helped draft the provisions and will also charge for consultation on them. Considers there needs to be a clear separation between plan-making and implementation.	Seeks that farms with a certified Freshwater Farm Plan (FWFP) include a chapter on SASM management, allowing for permitted activity status. Alternatively, consultation could be provided by a Suitably Qualified Person (SQP) with relevant qualifications and experience, promoting a competitive market and reducing workload for iwi.
290.77	Philip and Becky Wilson	Sites and Areas of Significance to Maori	General	Oppose	Considers the uncertainty of time and cost associated with consenting, particularly under the SASM provisions should be supported by a service level agreement. Considers that some issues are better addressed through RMA reform and that many Significant Natural Areas and Natural Features and Landscapes appear to have been mapped without proper landowner engagement.	Seeks for the withdrawal of the Sites and Areas of Significance to Māori, Natural Features and Landscapes, Natural Character and Ecosystems and Biodiversity Chapters until the RMA reform is complete and an MOU is in place with Aukaha detailing time and cost of consultation.
290.78	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-O1 Rakatirataka and kaitiakitaka The rakatirataka of mana whenua over their signif	Amend	Supports the intent with modification to clarify that the objective is not intended to be in isolation from the landowner. Considers that that the exercise of kaitiakitaka can't be implemented without agreement from the land owners who have their own rights and responsibilities within their own relationship with the land	Seeks to amend as follows: The rakatirataka of mana whenua over their significant sites and areas is recognised and they are able to exercise kaitiakitaka within these areas with agreement from the land owners.

290.79	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-O2 Protection of wāhi tūpuna values The relationship of mana whenua with wāhi tūpuna	Support	Support for the objective particularly the goal of increasing community awareness of wāhi tūpuna values. Considers that landowners have historically maintained relationships with these sites without needing district plan provisions and that regulation is not necessary to sustain mana whenua connections.	Seeks that the values for protection need to be identified in the PDP.
290.80	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-O3 Preservation of tuhituhi neherā The integrity of tuhituhi neherā sites is prese	Support	No specific reasons given	Retain as notified
290.81	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-O4 Enhancement of mahika kai Mahika kai values are enhanced to support customary use.	Support	Support with modification to recognise that mahika kai values are maintained and where appropriate these values enhanced, as it may not always be possible to enhance.	Seeks to amend as follows: Mahika kai values are <u>maintained</u> or, enhanced <u>where appropriate</u> to support customary use.
290.82	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-O5 Access and use for customary purposes Mana whenua are able to access wāhi tūpuna f	Oppose	Considers the objective requires clarification that it does not imply a general right of access to wāhi tūpuna and that access should be with landowner permission. Considers the Trespass Act is impractical for managing access and may strain iwi–landowner relationships.	Seeks to amend as follows: Mana whenua are able to access, <u>where appropriate</u>, wāhi tūpuna for customary purposes and are able to use Mahika kai resources in accordance with tikaka <u>and with landowner agreement.</u>
290.83	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-P1 Identification of wāhi tūpuna Working with mana whenua, identify, on Planning m	Support	No specific reason given	Retain as notified
290.84	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-P2 Mana whenua involvement in resource management processes Provide for the invol	Oppose	Considers the policy should clarify whether rules apply only where wāhi tūpuna values remain, or even where they've been physically altered but still hold cultural significance. Considers that consultation for all activities within or near wāhi tūpuna areas places a significant burden on landowners and mana whenua and the policy should be more targeted, directing consultation and notification to situations where it would meaningfully support the protection or enhancement of wāhi tūpuna values.	Seeks to amend the SASM overlay to map only where the values are known to still exist. If the maps cannot be changed, seeks to amend as follows: Provide for the involvement of mana whenua in resource management processes affecting identified wāhi tūpuna by encouraging consultation and engagement with mana whenua prior to undertaking activities <u>which will have an adverse effect on the maintenance or enhancement of</u> ~~or applying for resource consent within or adjoining~~identified wāhi tūpuna.
290.85	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-P3 Management of wāhi tūpuna Only allow or provide for land use and development in id	Support	Support with amendment to provide for the protection of existing uses.	Seeks to amend as follows: ~~Only allow or provide for~~<u>Ensure new</u> land use and development in identified wāhi tūpuna ~~where it~~ avoids significant adverse effects, and avoids, remedies or mitigates other adverse effects, on the <u>remaining</u> values associated with these areas, having particular regardto: ...
290.86	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-P4 Obstruction of mauka, tuhituhi neherā and wai māori by structures Avoid the loc	Support	Support is given in part to SASM-P4, with a preference for clearly identifying the locations of mauka, tuhituhi neherā, and wai māori on District Plan maps to guide where structures should be avoided. Considers provision should also be made for compatible structures that support land uses enhancing wāhi tūpuna values,	Seeks to amend as follows:

					and the policy should explicitly protect existing uses while avoiding vague terms like “or near.”	Avoid the location of new structures in riparian margins, on ~~or near~~ limestone outcrops, on upper slopes and on ~~or near~~ ridgelines unless: 1. they do not obstruct views to and across culturally significant waterbodies, tuhituhi neherā or mauka; and 2.~~they avoid adverse effects on thet~~he structure can maintain or enhance the wāhi tūpuna values of these areas.
290.87	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-P5 Protection of integrity of tuhituhi neherā Avoid the following activities on, o	Oppose	Concerns with the assumptions in irrigation modelling used to assess impacts and considers evidence suggests water loss may be overestimated and low-rate irrigation can avoid adverse effects. Considers that while the intent to protect tuhituhi neherā is supported, the policy should acknowledge that some existing agricultural and forestry activities have been compatible with these values and may continue to be so.	Seeks to permit and encourage low-rate irrigation and discourage high-rate irrigation [refer to original submission]. Also seeks for the protection of existing uses to be explicitly provided for in SASM-P4. Sekoto amend as follows: Avoid the following new activities on areas mapped as, ~~or in close proximity to~~, limestone outcrops; 1.~~agricultural intensification~~high-rate irrigation; and 2. plantation forestry, unless any adverse effects on the integrity of tuhituhi neherā from disturbance of land and vegetation and changes in the water table, soil water environment and air moisture are avoided.
290.88	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-P6 Culturally incompatible activities Avoid degradation of the values of wāhi tūpu	Support	No specific reason given.	Seeks to retain as notified.
290.89	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-P7 Habitat restoration and enhancement Encourage restoration and enhancement of indig	Support	No specific reason given.	Seeks to retain as notified.
290.90	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-P8 Mahika kai activities Enable mana whenua to undertake mahika kai activities in ide	Support	Support in part with a request for modification, as the PDP does not grant general access rights or transfer ownership of mahika kai resources, and the current user notes lack legal standing and clarity on ownership. Considers the policy should be reworded to more accurately reflect how theobjectivewill be achieved while fostering respectful relationships between landowners and iwi.	Seeks that the PDP should clarify that landowner permission is required to undertake mahika kai. Also seeks to amend as follows: Enable mana whenua to undertake mahika kai activities in identified wāhi tūpuna, in accordance with tikaka and with landowner agreement.
290.91	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-P9 Access for customary purposes Maintain existing access opportunities and encourage	Support	Support in part with a request to clarify that it does not create a general right of access to wāhi tūpuna on private land and that access should remain subject to landowner permission. Considers the policy should be reworded to reflect existing legal frameworks and practical considerations, ensuring respectful relationships and sustainable resource management.	Seeks to amend as follows: Maintain existing access opportunities and encourage enhancement of access, where appropriate, for mana whenua to identified wāhi tūpuna for customary purposes with landowner agreement.

290.92	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-P10 Wilding conifer species Protect wāhi tūpuna from modification by wilding conifer	Support	No specific reason given.	Seeks to retain as notified.
290.93	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-R1 Mahika kai activities within a wāhi tūpuna identified in SCHED5 – Sites and Areas of S	Support	Support in part with modifications.	Seeks to amend as follows: Activity status: Permitted Where: PER-1: An agreement is reached with the landowner permitting access and use of resources. Activity status when compliance is not achieved: ~~Not Applicable~~Prohibited Note: The provisions in this rule do not override the provisions of the Trespass Act 1980. There is no general right of public access across private land or right to use private resources.
290.94	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-R2 Buildings and structures within a wāhi tūpuna identified in SCHED5 - Sites and Areas o	Oppose	Opposes in part, as the 200m^2 threshold lacks justification and may unnecessarily increase consent requirements, while compatible structures that support wāhi tūpuna values should be distinguished. A 6m height limit for buildings and 25m for structures such as silos is supported, and low-rate irrigation infrastructure should be permitted within 100m of limestone cliffs to avoid unintended environmental impacts. The rule should clarify restricted discretionary matters, avoid unnecessary expert assessments, and ensure access, alternatives, and enhancement requirements are practical and proportionate [refer to original submission].	Seeks to amend as follows: Activity status: Permitted Where: PER-1 The building or structure has a maximum building footprint of ~~200~~350m2; and PER-2 The building ~~or structure~~has a maximum height of 6m as measured from the existing natural ground level; and PER-3 The structure has a maximum height of 25m; and ~~PER-3~~PER-4 The building or structure is not located within 20m of a waterbody or 50m of a wetland (excluding farm buildings or farm structures less than 10m2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating);and ~~PER-4~~PER-5 The building or structure is not located on, or within, 100m of a limestone escarpment (excluding farm buildings or farm structures less than 10m2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating);

						and ~~PER-5~~PER-6 The building or structure is not located on or within 20m vertical distance of a ridgeline (excluding farm buildings or farm structures less than 10m2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating); and ~~PER-6~~PER-7 The building or structure is located at an elevation less than 900m above sea level (excluding farm buildings or farm structures less than 10m2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating). Matters of discretion are restricted to: 1. whether the relevant rūnaka has been consulted, the outcome of that consultation, and the extent to which the proposal responds to, or incorporates the outcomes of that consultation; and 2. the ~~potential~~ adverse effects on the values of the wāhitūpuna, and the relationship of mana whenua with the area, including: a. loss of wāhitūpunaassociations through modification of the landscape and natural processes; and ~~b. damage to the integrity of wāhitūpunathrough disturbance of land and/or indigenous vegetation; and~~ c. disturbance of wāh itapu and archaeological sites; and d. adverse effects on the ~~integrity~~preservation of tuhituhi neherā sites~~including through disruption of the landform or water balance in the area;~~and e. adverse effects on the mauri of waterbodies; and f. reduction in the extent and quality ofmahikakai; and ~~g. loss of access to mahika kai for customary activities; and~~ 3. effects on sites where there is the potential for kōiwi or artefacts to be found, including consideration of the need to impose an accidental discovery protocol or have a cultural monitor present; and ~~4. whether there are alternative methods, locations or designs that would avoid or reduce the impact on the values associated with wāhitūpuna; and~~ ~~5. the appropriateness of any mitigation measures, including monitoring, planting or improved access for customary use; and~~ ~~6. whether the proposal provides an opportunity to recognise mana whenua culture, history and identity associated with the wāhi tūpuna, and any potential to:~~ ~~a. affirm the connection between mana whenua and the wāhi tūpuna; or~~ ~~b. enhance the cultural values of the wāhi tūpuna~~ Activity status when compliance is not achieved: ~~Non-Complying~~ Discretionary

						Where: ~~NC-1~~DIS-1 Compliance is not achieved with PER-3, PER-5 and/or PER-6 Notification: Any application made under RDIS-1 and/or NC-1 may be notified to TeRūnangao Moeraki
290.95	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-R3 Indigenous vegetation clearance within a wāhi tūpuna, identified in SCHED5 - Sites and	Support	Support with request to modify the rule so it does not discourage landowners from planting new indigenous vegetation, and to allow a permitted pathway for indigenous vegetation removal where landowners have certified Freshwater Farm Plans.	Seeks to amend as follows: PER-1 ... k. improved pasture ... PER-4 The indigenous vegetation was planted after 1st March 2025 and complies with a certified Freshwater Farm Plan.
290.96	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-R4 Earthworks within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significanc	Oppose	Oppose in part as it excludes earthworks forpermittedbuilding platforms and would create unnecessary consent requirements for routine activities, especially where SASM overlays cover farm bases and improved pasture with no archaeological value. The submitter suggests either removing SASM overlays from such areas or modifying the rule to increase earthworks thresholds (e.g., to 3m cut and 1,000m^2 area), manage effects through permitted activity criteria, and use boundary setbacks in residential settings, thereby reducing the consent burden while still protecting genuinely sensitive sites.	[refer to original submission for full relief sought] Seeks to amend as follows: [GRUZ/RLZ/OSZ]: PER-3 The permitted activity standards of EW-R1 are complied with; and PER-4 Earthworks are set back 100m from tuhituhi nehera and complies with a certified Freshwater Farm Plan; and PER-5 Earthworks are set back 20m from mahika kai resources; and PER-6 Access to mahika kai resources is not obstructed; and ... PER-9 The earthworks are associated with any permitted activity under SASM-R2. [GRZ/SETZ]

						Where: ~~PER-5~~PER-10 All earthworks where they comply with the following earthworks standards where relevant: 1. EW-S1 Threshold areas [submitting change to 1,000m]. 2. EW-S2 Maximum cut depth and fill height [submitting change to 3m cut and fill depth]; and 3. EW-S4 Earthworks within 20 metres of a waterbody
290.97	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-R5 Urupā within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significance to	Support	Support for existing urupā, but request that new urupā be treated the same as cemeteries due to similar environmental effects, while acknowledging their different cultural and spiritual significance.	Seeks to retain as notified.
290.98	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-R6 Amenity planting and shelterbelts within a wāhi tūpuna, identified in SCHED5 – Sites a	Support	Support but considers specific provision to permit existing shelterbelts within 100m of limestone escarpments is required.	Seeks to amend as follows: Where: PER-1 The new amenity planting or shelterbelt is not located on or within 100m of a limestone escarpment.
290.99	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-R7 Natural hazard mitigation structures within a wāhi tūpuna, identified in SCHED5 - Site	Support	Support with modification to allow a permitted pathway for councils or private applicants to create natural hazard structures, provided iwi are consulted to ensure any permitted activity pathway addresses potential effects on cultural values.	Seeks to consult with iwi regarding effects they wish to manage with SASM-R7 and what a permitted activity pathway could be. Amend as follows: Activity status~~: Restricted Discretionary~~Permitted PER-1 Fish passage is not impeded. Where: RDIS-1 The structures are erected by, or on behalf of, Waitaki District Council, Otago Regional Council, or Canterbury Regional Council. Matters of discretion are restricted to: 1. The matters of discretion listed in SASM-R2 RDIS-1. Notification: Any application made under ~~this rule~~DIS-1 may be notified to Te Rūnanga o Moeraki.
290.100	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-R8 Agricultural intensification within a wāhi tūpuna, identified in SCHED5 - Sites and Ar	Oppose	No specific reason given.	[refer to original submission]
290.101	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-R9 Commercial outdoor recreation within a wāhi tūpuna, identified in SCHED5 - Sites and A	Support	Support if SASM overlays are adjusted to exclude improved pasture, otherwise, opposes the rule as considers it unnecessarily restricts landowner diversification in less sensitive areas without clear evidence of adverse effects. Considers iwi oversight is	Seeks to delete the rule if the SASM mapping remains.

					justified for archaeological sites, but requiring consent for recreation in non-sensitive areas needs strong justification.	
290.102	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-R10 Plantation forestry activities within a wāhi tūpuna, identified in SCHED5 - Sites and	Support	No specific reason given.	Seeks to retain as notified.
290.103	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-R11 Mining activities, farm quarries or quarrying activities within a wāhi tūpuna, identi	Oppose	Oppose in part requesting that farm quarries be excluded from the rule and permitted with appropriate setbacks from sensitive sites, so properties mostly covered by a SASM overlay can still meet operational needs. Considers existing quarries should remain permitted, and the rule could be supported if the overlay mapping is rationalised as submitted.	Seeks to amend as follows: New mining activities, farm quarries or quarrying activities within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significance to Māori Activity status: ~~Discretionary~~Permitted Where: PER-1 The farm quarry is set back 100m from tuhituhi nehera, waterways, limestone escarpments, archaeological sites and cemeteries or urupa. ~~DIS-1~~PER-2 Gravel extraction is required for flood mitigation works. undertaken by a regional council. Notification: Any application made under NC-1 t~~his rule~~ may be notified to Te Rūnanga o Moeraki.
290.104	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-R12 Cemeteries or crematoria within a wāhi tūpuna, identified in SCHED5 - Sites and Areas	Support	No specific reason given.	Seeks to retain as notified.
290.105	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-R13 Landfills within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significanc	Support	No specific reason given.	Seeks to retain as notified.
290.106	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-R14 Wastewater treatment plants within a wāhi tūpuna, identified in SCHED5 - Sites and Ar	Support	No specific reason given.	Seeks to retain as notified.
290.107	Philip and Becky Wilson	Sites and Areas of Significance to Maori	SASM-R15 Planting wilding conifer species within a wāhi tūpuna, identified in SCHED5 - Sites a	Support	No specific reason given.	Seeks to retain as notified.
290.108	Philip and Becky Wilson	Earthworks	General	Oppose	Oppose in part noting that small-scale, occasional earthworks are essential for primary production, land management, and health and safety, and are critical to the economic and sustainable management of land and water resources.	No specific relief sought.

290.109	Philip and Becky Wilson	Earthworks	EW-O1 Earthworks activities Earthworks activities enable people and communities, social	Support	No specific reason given.	Seeks to retain as notified.
290.110	Philip and Becky Wilson	Earthworks	EW-O3 Protecting communities Earthwork activities are undertaken in a manner that maint	Support	No specific reason given.	Seeks to retain as notified.
290.111	Philip and Becky Wilson	Earthworks	EW-O2 Protecting sensitive environments Indigenous biodiversity, natural landscapes, natur	Support	Support with modification to clarify and narrow scope by defining "natural landforms," referencing "Significant Natural Areas" for indigenous biodiversity and aligning references to "natural landscapes" and "natural features" with Outstanding Natural Landscapes and Features, while ensuring existing earthworks in sensitive environments can continue. Considers the objective should also reference 'Historic and Cultural Values' for clarity and efficiency, and protect long-standing activities like the Oamaru Stone Quarry within sensitive environments.	Seeks to amend as follows: ~~Indigenous biodiversity~~Significant Natural Areas, Outstanding natural landscapes, ~~natural landforms,~~Outstanding natural features, ~~mana whenua~~and historic and cultural ~~heritage~~values are protected from the adverse effects of new earthworks.
290.112	Philip and Becky Wilson	Earthworks	EW-P1 Enabling earthworks Enable earthworks where the scale, extent and effects are approp	Support	No specific reason given.	Seeks to retain as notified.
290.113	Philip and Becky Wilson	Earthworks	EW-P2 Protecting sensitive environments Provide for earthworks where adverse effects on th	Support	No specific reason given.	Seeks to retain as notified.
290.114	Philip and Becky Wilson	Earthworks	EW-P3 Conservation activities within sensitive environments Enable earthworks that facilit	Support	No specific reason given.	Seeks to retain as notified.
290.115	Philip and Becky Wilson	Earthworks	EW-P4 Primary production activities Enable earthworks that support the operational effi	Support	Support with modification to allow earthworks for installing identified infrastructure and farm buildings, as considers these are managed by existing standards and provide positive environmental effects. Considers enabling primary production activities should be maximised outside sensitive environments, which are already protected by other plan provisions.	Seeks to amend as follows: Enable earthworks that support the operational efficiency of primary production activities, including the construction, maintenance and repair of existing farm tracks, farm buildings, yards, irrigation systems, fences, dams, stormwater infrastructure, sedimentation ponds, culverts and stormwater drains.
290.116	Philip and Becky Wilson	Earthworks	EW-P5 Construction and maintenance of farm tracks and recreational tracks Enable earthwork	Support	No specific reason given.	Seeks to retain as notified.
290.117	Philip and Becky Wilson	Earthworks	EW-P6 Earthworks within the National Grid Yard Enable earthworks within the National Grid	Support	No specific reason given.	Seeks to retain as notified.

290.118	Philip and Becky Wilson	Earthworks	EW-P7 The effects of earthworks Manage any earthworks to avoid, remedy or mitigate adve	Support	Support with modification to clarify that effects should be controlled beyond the site boundary and that visual amenity and local amenity values should only apply off-site and in sensitive environments, while removing soil quality as it is a regional council matter.	Seeks to amend as follows: Manage any earthworks to avoid, remedy or mitigate adverse effects on the following: 1. the stability of land, buildings and structures at or beyond the boundary of the site; and 2. the visual amenity values of the site in a sensitive environment, and after rehabilitation; and ~~3. natural landforms; and~~ 4. local amenity values beyond the boundary of the site; and 5. erosion and sediment loss from the site; and ~~6. natural hazard risk; and~~ 7. the stormwater management systems; and 8. dust, lighting, odour, vibration, noise and traffic beyond the boundaries of the site; and ~~9. soil quality.~~
290.119	Philip and Becky Wilson	Earthworks	EW-P8 Rehabilitation of disturbed ground Enable earthworks that enhance, restore or rehabi	Support	Support with modification that restoration should not always reflect the surrounding landform and vegetation, but enhancement or rehabilitation may require different approaches such as replacing undesirable species with more suitable ones. Considers the policy should enable positive changes rather than require strict replication of existing conditions.	Seeks to amend as follows: Enable earthworks that enhance, restore or rehabilitate areas of disturbed ground ~~to reflect the surrounding landform and vegetation.~~
290.120	Philip and Becky Wilson	Earthworks	EW-R1 General earthworks located outside of a sensitive environment All zones Activit	Support	Support with modified standards as detailed below [refer to original submission].	Seeks to retain as notified but with amended standards [refer to original submission]
290.121	Philip and Becky Wilson	Earthworks	EW-R2 Earthworks for repair and maintenance activities within or outside of a sensitive enviro	Support	Support with the addition of construction of infrastructure and farm buildings, so that earthworks for house builds or small sheds are permitted without unnecessary extra consent, while large-scale construction remains controlled by existing thresholds.	Seeks to amend as follows: Earthworks for construction, repair and maintenance activities within or outside of a sensitive environment PER-1 ... 10. farm buildings; and PER-3 Earthworks undertaken for the lawful establishment of: 1. farm tracks; 2. yards; 3. water supply and irrigation systems; 4. fences; 5. dams/ponds; 6. walking and cycling tracks; 7. driveways and accessways;

						8. stormwater infrastructure, sediment detention ponds, culverts and stormwater drains; 9. coastal hard protection structures;
290.122	Philip and Becky Wilson	Earthworks	EW-R3 Earthworks for the construction of farm tracks, public footpaths, public bridle paths an	Support	Support with amendment to allow wider dairy tracks (at least 6.5–8m) and accommodate larger machinery, as recommended by Dairy NZ and typical for the Waitaki District.	Seeks to amend as follows: Where: PER-1 The track is associated with a permitted or lawfully established activity within the zone and does not exceed ~~4~~ 8metres in width with an additional allowance of 1 metre either side of the track for battering; and
290.123	Philip and Becky Wilson	Earthworks	EW-R4 Earthworks for conservation activities within a sensitive environment All zones	Support	Support with a higher threshold, as considers requiring consent for conservation earthworks in sensitive environments could discourage important activities like fencing SNAs or planting indigenous species.	Seeks to either permit the relevant earthworks thresholds for the underlying zone or increase the threshold within all conservation activities rules. Seeks to amend as follows: Earthworks for conservation activities within a riparian margin or sensitive environment Activity status: Permitted Where: PER-1 ~~On any site earthworks do not exceed 25m2 in area over any 3 year period.~~ ~~PER-2~~ All of the following standards are complied with: 1. EW-S2 Maximum cut depth and fill height; 2. EW-S3 Earthworks on sloping sites; and ~~3. EW-S4 Earthworks within 20m of a waterbody.~~ Activity status when compliance is not achieved: Restricted Discretionary Where: RDIS-1 Compliance is not achieved with ~~PER-2~~PER-1 Matters of discretion are restricted to: 1. the matters of discretion listed in any of the standards EW-S2, EW-S3 and/or EW-S4 that are not complied with. ~~Activity status when compliance is not achieved: Discretionary~~ ~~Where:~~ ~~DIS-1~~ ~~Compliance is not achieved with PER-1~~

290.124	Philip and Becky Wilson	Earthworks	EW-R5 Earthworks within a riparian margin All zones Activity status: Permitted Wher	Support	Support with modifications to clarify the distinction between regional and district council responsibilities, remove duplication in matters of discretion, permit maintenance of water supply systems, and limit consideration of cumulative effects to those specifically identified.	Seeks to amend as follows: PER-3 ... c. water supplyor irrigation systems; Matters of discretion are restricted to: ... 2. the extent and management of adverse effects or cumulative effects on natural character of the riparian margin, including: a. the extent to which the proposed earthworks will: i. allow natural elements to dominate; and ~~ii. introduce man-made elements to the riparian margin; and~~ iii. affect the amenity values of the riparian margin; and iv. create disturbances that will be ... ~~ix. restrict access for mahika kai purposes; and~~ ~~3. any cumulative effects.~~
290.125	Philip and Becky Wilson	Earthworks	EW-R6 Earthworks and land disturbance within the National Grid Yard All zones Activit	Support	No specific reason given.	Seeks to retain as notified.
290.126	Philip and Becky Wilson	Earthworks	EW-R7 Earthworks within a sensitive environment All zones Activity status: Discretion	Support	No specific reason given.	Seeks to remove area thresholds so they default to regional council thresholds and introduce standards or permitted activity criteria to manage the effects of earthworks directly. If threshold areas are to remain seeks to increase threshold to 1,000m2 for all zones. Seeks to amend as follows: Matters of discretion are restricted to: 1. whether earthworks changing the landform of a ridgeline are of a type, scale and form that is appropriate for the location and anticipated character of the zone; and 2. the management of silt, sediment and erosion on-site; and 3. impacts on amenity values beyond the site boundary, , including whether the cut face and/or any retaining structures can be concealed behind development or effectively landscaped; and 4.landscape treatment, site reinstatement and screening; and

290.127	Philip and Becky Wilson	Earthworks	EW-S1 Threshold areas (m2) All Residential Zones Rural Lifestyle Zone Settlement Zo	Oppose	Considers that area thresholds are an inadequate tool for managing earthworks as they focus on the size of the activity rather than its environmental impact and effect management should take precedence over area measurement. Considers that thresholds should be used as matters of discretion or permitted activity criteria, not rigid limits and that the current thresholds are too low, capturing routine activities like house scrapes, silage pits, and shed construction. Also considers that the standards duplicate those in the NFL chapter, regarding landscape effects, which are subjective and undefined outside NFL overlays.	Seeks to remove area thresholds so they default to the regional council thresholds and introduce standards or permitted activity criteria to manage the effects of earthworks directly. If threshold areas are to remain, seeks to increase to be consistent with the enabling intent of EW-O1, EW-P1, EW-P3, and EW-P4. Seeks to remove all requirement for landscape assessment from matters of discretion. Seeks to remove reference to natural form which is not defined. Seeks to amend as follows: All/RLZ/SETZ: The quantity of earthworks must not exceed ~~300m2~~ 1,000m2 in any 12 month period per site. GRUZ/CMUZ/SPZMM: The quantity of earthworks must not exceed ~~500m2~~ 1,000m2 in area in any 12 month period per ~~site~~100ha. Matters of discretion are restricted to: 1. whether ~~the~~ earthworks changing the landform of a ridgeline are of a type, scale and form that is appropriate for the location and anticipated character of the zone; and 2. the management of silt, sediment and erosion on-site; and 3. impacts on ~~character and~~ amenity values beyond the site boundary, ~~natural landforms and features~~, including whether the cut face and/or any retaining structures can be concealed behind development or effectively landscaped; and 4.~~visual amenity, including~~ landscape treatment, site reinstatement and screening; and ~~5. the potential for cumulative effects on the natural form of the landscape; and~~ 6. whether the earthworks involve the removal of topsoil or subsoil from a site that is identified as having a Land Use Capability classification of 1, 2 or 3; and 7. duration of the earthworks and hours of operation; and 8. the management of the effects of dust, vibration, noise, lighting, odour and traffic movements at or beyond the boundaries of the site. ~~Note: A landscape assessment may be required for the assessment of this standard.~~ Note: A site management plan may be required for consideration of matters of discretion (2), (7) and (8) in EW-S1.

290.128	Philip and Becky Wilson	Earthworks	EW-S2 Maximum cut depth and fill height The cut depth or fill height must not exceed 1	Support	Support for EW-S2 with modification to reduce the number of consents that will be required across the district.	Seeks to amend as follows: 1. The cut depth or fill height must not exceed ~~1.5~~3metres as measured vertically; and 2. Cut or fill supported by a retaining wall must be setback a distance at least equal to the height of the retaining wall. 3. Cut and fill equal to or less than 0.5m in height is exempt from this standard. 4. Cut and fill for building platforms is exempt from this standard. 5. Earthworks over 1.5m in height or depth that take place within 1.5m of a site boundary require a written approval from the adjoining landowner. ~~Note: Earthworks over 1.5m in height or depth that take place within 1.5m of a site boundary may require a written approval from the adjoining landowner.~~
290.129	Philip and Becky Wilson	Earthworks	EW-S3 Earthworks on sloping sites Earthworks must not take place on slopes with an ang	Support	No specific reason given	Retain as notified
290.130	Philip and Becky Wilson	Earthworks	EW-S4 Earthworks within 20 metres of a waterbody Earthworks shall not take place withi	Support	Support with modification to reduce consent costs and improve clarity around when ecological or landscape reports are required.	Seeks to amend as follows: Matters of discretion are restricted to: 1. the provision of sediment control techniques to ensure sediment run-off does not enter a waterbody; and 2. effects of earthworks within 5m of the waterbody on the natural character and ecological values of the waterbody; and ~~3. impacts on the character and amenity values, natural landforms and features; and~~ ~~4. management of visual amenity effects through~~landscape treatment, site reinstatement and screening; and ~~5. the potential for cumulative effects on the natural form of the landscape.~~ Note: A site management plan may be required for consideration of the assessment matter 1. Note: An ecological report ~~and/or landscape assessment~~may be required for consideration of matters of discretion (2),~~(3), (4) and (5)~~ in EW-S4.

290.131	Philip and Becky Wilson	Earthworks	General	Support	Support the rules, objectives and policies overall especially EW(Q)-P1 for farm quarries, as enabling on-farm aggregate use benefits the environment by reducing road wear and transport emissions.	Seeks to retain as notified.
290.132	Philip and Becky Wilson	Earthworks	EW(Q)-P4 Existing quarries Enable the continued operation of existing lawfully established	Support	Support the protection of existing quarries beyond existing use rights, as considers it is critical to avoid excessive consent barriers that could threaten their continued operation, similar to the challenges faced by landfills.	Seeks to retain as notified.
290.133	Philip and Becky Wilson	Earthworks	EW(Q)-R1 Farm quarry General Rural Zone Special Purpose Zone - Macraes Mining Activ	Support	Support with modification, as considers the current restriction on quarrying in sensitive environments is too broad and prevents the benefits of farm quarrying across much of the district. Considers the rule should be proportionate to the scale limits already in place and earthworks in sensitive environments are managed by other chapters.	Seeks to amend as follows: PER-6 The farm quarry is not located within ~~a sensitive environment or within~~ the Coastal Environment or Coastal Natural Hazard overlays.
290.134	Philip and Becky Wilson	Earthworks	EW(Q)-R4 Quarrying activities (excluding farm quarry and restricted use quarry) Special	Support	Support with modification for consistency, as the current daily extraction limit of 100m3 is inconsistent with the allowed number of heavy vehicle trips in (CON-4).	Seeks to amend as follows: CON-3 The quantity of aggregate extracted is limited to ~~100m3~~ 200m3 day; and
290.135	Philip and Becky Wilson	Earthworks	General	Support	General support but considers that quarrying activities currently captured by the mining definition should instead be managed under quarrying provisions to ensure protection for existing quarries.	Seeks to retain as notified but with changes to mineral definition as submitted.
290.136	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	General	Oppose	Oppose the chapter in part - considers proceeding with identifying new SNAs before the government's review and changes to the NPS-IB will create unnecessary and repeated requirements for landowners and the community, especially given the current suspension of council obligations to identify new SNAs until October 2027.	Seeks to retain the existing policy and rule framework for managing indigenous biodiversity in the ODP and implement only the requirements of the NPS-IB where SNAs have already been identified by the current/operative district plan. Seeks to defer the wider chapter review until there is more certainty from government and until such time that the review of the NPS-IB has occurred.
290.137	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-O1 Halt the decline of indigenous biodiversity Halt the decline of the Waitaki Dist	Oppose	Oppose in part, supporting the management of indigenous biodiversity in line with national direction, but seek amendment to focus maintenance and enhancement efforts on significant habitats and fauna, rather than requiring resource-intensive calculations across all zones. Considers the objective should prioritize consistency with national policy and target significant areas for enhancement where appropriate.	Seeks to amend as follows: ~~Halt the decline~~Manage of the Waitaki District's indigenous biodiversity ~~so there is at least no overall loss, including between species and ecosystems~~,by maintaining and, where appropriate, enhancing indigenous biodiversity, in areas of mapped significant indigenous habitats and significant fauna (Significant Natural Areas)~~and to achieve this~~by: 1. protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity while providing for the social, cultural and economic wellbeing of people and communities now and in the future; and 2. recognising the mana of takata whenua ~~as~~to exercise kaitiaki ~~of~~in relation to maintaining, enhancing and

						restoring indigenous biodiversity; and 3. recognising people and communities, including landowners, as guardians of indigenous biodiversity.
290.138	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-O2 Identify and protect Significant Natural Areas Areas identified as Significant Natu	Oppose	Oppose in part, seeking modification for clarity and consistency with ECO-O1, and to ensure the objective focuses on the purpose of identifying SNAs, involves transparent partnership with landowners, and does not discourage new indigenous plantings. Considers SNAs should only be identified where indigenous biodiversity already exists as of March 1,2025and the process should recognise the role of sustainable land uses in maintaining significant values and avoid duplicating efforts or undermining trust with landowners.	Seeks to amend as follows: ECO-O2 Identify ~~and protect~~Significant Natural Areas ~~Areas identified as Significant Natural Areas are protected to ensure no net loss of indigenous biodiversity or indigenous biodiversity values as a result of land use activities.~~Work with people and communities, including mana whenua and landowners, to identify Significant Natural Areas of indigenous biodiversity established in accordance with the NPS-IB.
290.139	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-O3 Restore or enhance Significant Natural Areas Significant Natural Areas are resto	Support	Support in part, agreeing that restoration and enhancement should be encouraged where appropriate, but also emphasising the need to allow appropriate development where area values can be maintained, as many existing land management practices have already supported significant indigenous habitats and fauna.	Seeks to amend as follows: Existing mapped Significant Natural Areas are restored or enhanced, where appropriate and provision is made for the appropriate subdivision, use and development where the values of the area can be maintained.
290.140	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-P1 Evaluation of Significant Natural Areas Identify the ecological significance of	Oppose	Considers ECO-P1 should be deferred until the government review of the NPS-IB is complete.	Seeks for the deletion of ECO-P1 [refer to original submission for full relief sought] If ECO-P1 is not deleted, seeks to amend as follows: Work with mana whenua and landowners to identify the ecological significance of indigenous vegetation and habitats of indigenous fauna established before 1st March 2025 using; ~~1. the criteria contained in APP5 – Criteria for identifying areas that qualify as Significant Natural Areas (SNA); or~~ 1. The criteria in the NPS IB; or 2. in the case of Crown owned land, Clause 3.8(8) of the National Policy Statement on Indigenous Biodiversity and: ~~3. where they are known and meet the criteria to be SNA's, list them in SCHED6 Significant Natural Areas and on the Planning Maps;~~ ~~3. where they are not known,~~applying the criteria through the resource consent process, notice of requirement, outline plan, or other planning processes, to determine an area's significance; and 4. if a new Significant Natural Area is identified as a result of a resource consent application, include the SNA in SCHED6 – Significant Natural Areas in the next appropriate plan review or plan change notified by Waitaki District Council.

290.141	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-P2 Protection of Significant Natural Areas Except as provided for in clause 2 belo	Support	Support in part, with modification to split into simpler policies for clarity and ensuring sustainable land uses can continue alongside SNAs where effects are managed so landowners' can maintain Pest control and reinvestment in significant natural areas.	Seeks to amend as follows: 1. Except as provided for in clause 2 below, protect Significant Natural Areas listed in SCHED6 – Significant Natural Areas by: a. ensuring the following adverse effects are avoided, remedied or mitigated on the: i. loss of ecosystem representation and extent; .... 2.~~The~~Manage any adverse effects of subdivision, use and development on identified SNA's ~~shall be managed~~in accordance with 1.b. above only, in relation to the following activities: a. the new subdivision, use or development is required for the purposes of any of the following: i. construction or upgrade ~~(if the upgrade does not meet the requirements of clause 3.15(2) of the National Policy Statement on Indigenous Biodiversity)~~of specified infrastructure that provides significant national or regional public benefit: or ... v. thereis a functional need or operational need for the new subdivision, use or development to be in that particular location; and vi.there are nopracticablealternative locationsfor the new subdivision, useor development;
290.142	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-P3 Appropriate activities within Significant Natural Areas Enable limited - earthw	Support	Support in part - [No specific reason given]	Seeks to amend as follows: Enable limited- ... 3. Is for a lawfully established activity; or 4. The activity as a functional need to be located in the area; or 5. The activity has no more than minor adverse effects on the significant indigenous vegetation of fauna or habitat.
290.143	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-P4 Supporting the maintenance, restoration and enhancement of indigenous biodiversity	Support	Support in part, seeking amendments to recognise that different areas may require different management approaches, that primary production can benefit indigenous biodiversity, and that eco-sourced planting should only be required where justified. Also notes that integrated management across administrative boundaries can only be encouraged, not enforced.	Seeks to amend as follows: ... 3. encouraging, ~~or where appropriate requiring,~~ the use of eco-sourced indigenous plantings where it is available; 4.~~ensuring it is managed~~ encourage management in an integrated way, within, and across administrative boundaries; 5. giving effect to the decision-making principles set out in Clause 1.5 of the National Policy Statement on Indigenous Biodiversity; 6. recognising that maintaining indigenous biodiversity ~~requires~~can be achieved by:

						a. the maintenance and ~~at least~~ no overall reduction of ~~all~~ the following: ... 7. promoting increased indigenous vegetation cover in both urban environments and non-urban environments where appropriate; 8. requiring that significant adverse effects of activities on indigenous biodiversity (outside of SNA's or on specified Māori land) are managed by applying appropriate thresholds for indigenous vegetation clearance which was established after 1st March 2025, and where these are not met, by applying the biodiversity effects management hierarchy. 9. Recognising the benefits of farm management practices and active management of indigenous biodiversity including voluntary animal and plant pest and stock control and/or formal legal protection.
290.144	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-P5 National priorities for protection Recognise the following national priorities f	Support	No specific reason given.	Seeks to retain as notified.
290.145	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-P6 Impacts of climate change on resilience of ecosystems Take into account the potenti	Support	Support in principle, but suggests modifications to align with the NPS-IB by focusing on considering specific, known effects of climate change rather than speculative future impacts.	Seeks to amend as follows: ~~Take into account the potential future impacts~~Consider the effects of climate change to promote resilience of indigenous biodiversity to climate change: ...
290.146	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-P7 Providing for the relationship of takata whenua with indigenous biodiversity Pro	Support	No specific reason given.	Seeks to retain as notified.
290.147	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-P8 Indigenous vegetation on urban environment allotments Recognise that indigenous	Support	Support with a modification to include 'domestic curtilage' as defined in the plan, to ensure properties with septic tanks that don't meet the 'urban environment allotment' definition aren't unnecessarily subject to the ECO chapter's stricter requirements.	Seeks to amend as follows: Indigenous vegetation on domestic curtilage ~~urban environment allotments~~ Recognise that indigenous vegetation on domestic curtilage~~urban environment allotments~~is not protected, unless specifically scheduled in the plan as a Significant Natural Area or Notable Tree.
290.148	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-P9 Precautionary approach Adopt a precautionary approach to considering the adverse	Support	No specific reason given	Seeks to retain as notified.

290.149	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-P10 Provision for maintenance of improved pasture for primary production where it may affe	Support	Support with modifications to improve clarity by removing the subjective requirement for 'adequate evidence' of regular pasture maintenance, as the definition of pasture already implies this. Also consider that the clause excluding improved pasture that has become an SNA is unnecessary and circular, since such areas are already protected under SNA provisions.	Seeks to amend as follows: Allow for the maintenance of improved pasture to continue where: 1.~~there is adequate evidence to demonstrate that~~ the maintenance of improved pasture is part of a regular cycle of periodic maintenance of that pasture; 2. any adverse effects of the maintenance of improved pasture on an identified SNA are no greater in intensity, scale, or character than the effects of activities previously undertaken as part of the regular cycle of periodic maintenance of that pasture; ~~3. the improved pasture has not, itself, become an SNA;~~ ~~4. the land is not an uncultivated depositional landform; and~~ 5. the maintenance of improved pasture will not adversely affect a threatened or at risk (declining) species.
290.150	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-P11 Highly mobile fauna In relation to habitats of highly mobile fauna: identify a	Oppose	Considers the policy should be deferred until the NPS-IB review is complete.	Seeks to delete ECO-P11. If retained, seeks modification to make it consistent with the NPS IB and prevent duplication between territorial authority and regional council [refer to original submission for full relief sought] Seeks to amend as follows: In relation to habitats of highly mobile fauna: 1.Assist the regional council to identify and manage areas outside of SNA's that support specified highly mobile fauna to maintain their populations across their natural range, and improve information and awareness around them; and 2. manage the adverse effects of activities on them, in order to maintain viable populations of specified highly mobile fauna across their natural range.
290.151	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-P12 Restoration of indigenous biodiversity In relation to restoration of indigenous	Support	No specific reason given	Seeks to retain as notified.
290.152	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-P13 Commercial forestry In relation to commercial forestry: the adverse effects of	Support	Support in part with appropriate management of commercial forestry within existing mapped SNA areas.	Seeks to amend as follows: In relation to commercial forestry: 1. the adverse effects of commercial forestry activities in any existing commercial forest on any identified SNA must be managed in a manner that: a. maintains indigenous biodiversity in the identified SNA as far as practicable; while b. providing for commercial forestry activities to continue; and 2. despite ECO-P2, any part of an identified SNA that is within an area of an existing commercial forest that is planted, or is intended to be, replanted in trees for harvest must be managed over the course of consecutive rotations of production in the manner necessary to maintain the long-term populations of any threatened or at risk (declining) species present in the area.

290.153	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-P14 Managing indigenous vegetation outside Significant Natural Areas Avoid signific	Oppose	Considers the policy is overly broad and imposes disproportionate cost and complexity across the district, despite the NPS-IB not requiring territorial authorities to avoid significant adverse effects on indigenous vegetation outside SNAs.	Seeks to delete the provision.
290.154	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-P15 Inappropriate activities within or near to Significant Natural Areas Prohibit t	Support	Support with modification to specify that only deliberate planting is included.	Seeks to amend as follows: Prohibit the deliberate planting of:
290.155	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-R1 Indigenous vegetation clearance outside of a Significant Natural Area listed in SCHED6	Support	Support, in particular the provision permitting indigenous vegetation clearance for existing established activities, provided appropriate thresholds or circumstances are met.	Seeks to retain as notified.
290.156	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-R2 Indigenous vegetation clearance within a Significant Natural Area listed in SCHED6 – Si	Support	Support inpart, endorsing clearance of indigenous vegetation where there is a functional need within listed SNAs, but suggesting that minor breaches of permitted activity standards may not always warrant an ecological assessment and this should be reflected in the note.	Seeks to amend note as follows: Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any application made under this provision ~~must provide~~will likely require, in addition to the standard information requirements, an Ecological Assessment, provided by a suitably qualified ecologist, that is commensurate with the scale and significance of the proposal, and meets the requirements of APP8 - ECO Chapter Information Requirements for Resource Consents.'
290.157	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-R3 Earthworks within a Significant Natural Area listed in SCHED6 – Significant Natural Are	Support	Support with modifications to improve practicality by allowing earthworks within mapped SNAs where there is a functional need, and reconsidering the 10 working days' notice requirements, which may not be feasible in cases like emergencies or weather delays. Additionally, minor earthworks exceeding permitted standards may not always justify an ecological assessment, and the note should reflect this flexibility.	Seeks to amend as follows: PER-3 Silt and sediment control measures are in place to prevent discharge of silt and/or sediment into the Significant Natural Area ~~and notice is provided to Council 10 working days prior to the commencement of works.~~ Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any application made under this provision ~~must provide~~ will likely require, in addition to the standard information requirements, an Ecological Assessment, provided by a suitably qualified ecologist, that is commensurate with the scale and significance of the proposal, and meets the requirements of APP8 - ECO Chapter Information Requirements for Resource Consents.
290.158	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-R4 Exotic commercial forestry, agricultural intensification, quarrying activity or mining	Support	No specific reason given	Seeks to retain as notified with Matters of Discretion in the correct column.
290.159	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-R5 Commercial forestry, agricultural intensification, quarrying activity or mining activit	Support	Seeks to retain as notified with Matters of Discretion in the correct column.	Seeks to retain as notified

290.160	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-R6 Planting non-indigenous vegetation within a Significant Natural Area listed in SCHED6 –	Support	Support in part, noting that a blanket prohibition on planting non-indigenous vegetation within SNAs could significantly impact existing primary production, and suggesting that such activities should be considered through a resource consent process where adverse effects can be appropriately managed.	Seeks to amend as follows: ~~Planting~~Deliberate planting of new non-indigenous vegetation within a Significant Natural Area listed in SCHED6 – Significant Natural Areas Activity status: ~~Prohibited~~Discretionary
290.161	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-R7 Planting species that result in wilding conifers within a Significant Natural Area, or	Oppose	Oppose in part - should be clarified that only deliberate planting is controlled by ECO-R6 and ECO-R7.	Seeks to amend as follows: ~~Planting~~Deliberate planting of species that result in wilding conifers within a Significant Natural Area, or within 100m of a Significant Natural Area listed in SCHED6 – Significant Natural Areas
290.162	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-S1 Indigenous vegetation clearance in highly sensitive ecological environments that are no	Oppose	Oppose ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification, and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators.	[Refer to original submission for full relief sought] Seeks to amend as follows: Indigenous vegetation clearance in highly sensitive ecological environments that meet SNA criteria but are not currently identified as Significant Natural Areas Apart from maintenance of improved pasture, there~~There~~ shall be no indigenous vegetation clearance in the following locations:
290.163	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-S2 Indigenous vegetation clearance in sensitive ecological environments that are not curre	Oppose	Oppose ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification, and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators.	[Refer to original submission for full relief sought] Seeks to amend as follows: Indigenous vegetation clearance in sensitive ecological environments that meet SNA criteria but are not currently identified as Significant Natural Areas
290.164	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-S3 Indigenous vegetation clearance in threatened land environments Indigenous veget	Oppose	Oppose ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification, and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators.	[Refer to original submission for full relief sought] Seeksto amend as follows: Indigenous vegetation clearance in threatened land environments that meet SNA criteria but are not currently identified as Significant Natural Areas.
290.165	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-S4 Indigenous vegetation clearance areas dominated by snow tussock Indigenous vegetati	Oppose	Oppose ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification, and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and	[Refer to original submission for full relief sought] Seeks to amend as follows:

					mapped terms such as 'wetlands' to ensure clarity and usability for operators.	Indigenous vegetation clearance areas identified as dominated by snow tussock
290.166	Philip and Becky Wilson	Ecosystems and Indigenous Biodiversity	ECO-S5 General indigenous vegetation clearance If not addressed by ECO-S1 to ECO-S4, th	Support	Support ECO-S5 with amendments to ECO-S1 to ECO-S4.	Seeks to retain as notified
290.167	Philip and Becky Wilson	Natural Character	General	Support	General support for the chapter with modification to riparian margin definition.	Seeks to retain as notified with amendment to riparian margin definition
290.168	Philip and Becky Wilson	Natural Features and Landscapes	General	Support	Support in part but considers the stringent provisions applied to NFL overlays are disproportionate to the land types and the scale of coverage.	Seeks to adjust the overlays so that stringent rules apply only to landscapes that are agreed with landowners as significant or outstanding.
290.169	Philip and Becky Wilson	SCHED7 – Schedule of Outstanding Natural Features	ONF29 Outstanding Natural Feature Awamoko Stream Valley/Valley of the Whales Fe	Support	Considers the mapped overlay areas for ONF25 are too broad, and the stringent rules applied to them are disproportionate to the actual landscape characteristics. Considers that reliance on existing use rights is problematic, especially for activities like agricultural intensification, which can lose protection if paused for a year and the plan creates a risk of locking in current land uses, as stopping an activity could trigger a new consent requirement to restart it. Also considers that remote desktop mapping is inadequate and that ground-truthing with landowners has proven more effective and led to better agreement on overlay extents. [refer to original submission for full reasons]	Seeks to amend the boundaries for ONF25 as per map provided in original submission [refer to original submission for relief sought].Point
290.170	Philip and Becky Wilson	Natural Features and Landscapes	NFL-O1 Outstanding Natural Features and Landscapes Outstanding Natural Features and Landsc	Support	No specific reason given	Seeks to retain as notified
290.171	Philip and Becky Wilson	Natural Features and Landscapes	NFL-O2 Significant Natural Features and Rural Scenic Landscapes The values of Significant	Support	Supports in part the objective to protect Significant Natural Features and Rural Scenic Landscapes but suggests values should be maintained only where appropriate.	Seeks to amend as follows: The values of Significant Natural Features and Rural Scenic Landscapes are maintained where appropriate.
290.172	Philip and Becky Wilson	Natural Features and Landscapes	NFL-O3 Wilding conifers The impact of wilding conifers on Outstanding Natural Features and	Support	Supports in part the objective to reduce the impact of wilding conifers on landscape areas and suggests the policy should encourage reduction of these effects.	Seeks to amend as follows: Encourage the impact of wilding conifers on Outstanding Natural Features and Landscapes, Significant Natural Features, and Rural Scenic Landscapes is be reduced.
290.173	Philip and Becky Wilson	Natural Features and Landscapes	NFL-O4 Restoration and enhancement of landscapes Outstanding Natural Features and Landscap	Oppose	Opposes the objective as currently worded, arguing that it could result in subjective assessments and requiring restoration and enhancement of landscape values may not always be practicable and suggests limiting the requirement to where practicable.	Seeks to delete NFL-O4 but seeks to amend as follows if retained: Where practicable, Outstanding Natural Features and Landscapes, Significant Natural Features, and Rural Scenic Landscapes are restored and enhanced, where their values listed in this plan have been lost or degraded.
290.174	Philip and Becky Wilson	Natural Features and Landscapes	NFL-P1 Identification of Outstanding Natural Features	Support	Supports in part the policy for identifying Outstanding Natural Features, but recommends using the full Pigeon Bay criteria as current wording omits some of the criteria and could be	Seeks to delete NFL-P1. If retained, seeks to include all Pigeon Bay criteria and an additional requirement to work onsite in consultation with the land

			and Landscapes In relation to the		misleading. Also considers the policy implies changes could occur outside of the plan change or review process.	owner. Seeks also to include a note that changes will only occur through normal plan change or plan review.
290.175	Philip and Becky Wilson	Natural Features and Landscapes	NFL-P2 Identification of Significant Natural Features and Rural Scenic Landscapes In re	Support	Supports in part the policy for identifying SNF/RSL, but recommends using the full Pigeon Bay criteria as current wording omits some of the criteria and could be misleading. Also considers the policy implies changes could occur outside of the plan change or review process.	Seeks to deleteNFL-P2 If retained, seeks to include all Pigeon Bay criteria and an additional requirement to work onsite in consultation with the land owner. Seeks also to include a note that changes will only occur through normal plan change or plan review.
290.176	Philip and Becky Wilson	Natural Features and Landscapes	NFL-P3 Recognise the importance of protecting natural features and landscapes Recognise:	Support	No specific reason given.	Seeks to retain as notified.
290.177	Philip and Becky Wilson	Natural Features and Landscapes	NFL-P4 Avoiding inappropriate activities on or within Outstanding Natural Features or Landscap	Support	Supports in part the policy to avoid inappropriate activities on Outstanding Natural Features and Landscapes, but considers there is ambiguity in the wording and seeks clearer discouragement of critical infrastructure in these areas and more precise identification of values.	Seeks to amend as follows: Only provide for subdivision, use and development where it: 1. protects the values identified in SCHED7 – Outstanding Natural Features and SCHED8 – Outstanding Natural Landscapes that make the natural feature or landscape outstanding; and ~~2. avoids, remedies or mitigates adverse effects on other Outstanding Natural Features and Landscapes values, including avoiding any significant loss of indigenous vegetation.~~ 2. avoids the placement of critical infrastructure within the Outstanding Natural Features and Landscapes unless there is no reasonable alternative due to the functional need for the location and the adverse effects on landscape values can be avoided or appropriately managed.
290.178	Philip and Becky Wilson	Natural Features and Landscapes	NFL-P5 Avoiding inappropriate activities on or within Significant Natural Features and Rural S	Support	Supports the policy for Rural Scenic Landscapes and Significant Natural Features, but requests clarification that only identified values are protected, to avoid ambiguity.	Seeks to amend as follows: Only provide for subdivision, use and development in Rural Scenic Landscapes and on Significant Natural Features where it: 1.maintains ~~amenity values; and~~the values identified in SCHED9 - Significant Natural Features and SCHED10 - Schedule of Rural Scenic Landscapes. ~~2. avoids, remedies or mitigates adverse effects on other values of Significant Natural Features or Rural Scenic Landscapes, including avoiding any significant loss of indigenous vegetation.~~
290.179	Philip and Becky Wilson	Natural Features and Landscapes	NFL-P6 Landscape's ability to absorb change When determining a landscape's ability to abso	Support	Supports the policy but only if other landscape overlays are corrected as requested for ONF029.	Seeks to conditionally retain as notified.
290.180	Philip and Becky Wilson	Natural Features and Landscapes	NFL-P7 Earthworks within identified natural features and landscapes When determining if ea	Support	Supports the policy but only if other landscape overlays are corrected as requested for ONF029 [ONF025 - refer to submission point 298.169].	Seeks to conditionally retain as notified.

290.181	Philip and Becky Wilson	Natural Features and Landscapes	NFL-P8 Buildings and structures on or within identified natural features and landscapes Wh	Support	Supports the policy but only if other landscape overlays are corrected as requested for ONF029 [ONF025 - refer to submission point 298.169].	Seeks to conditionally retain as notified.
290.182	Philip and Becky Wilson	Natural Features and Landscapes	NFL-P9 Subdivision on or within identified natural features and landscapes Avoid subdivisi	Support	Supports the policy but only if other landscape overlays are corrected as requested for ONF029 [ONF025 - refer to submission point 298.169].	Seeks to conditionally retain as notified.
290.183	Philip and Becky Wilson	Natural Features and Landscapes	NFL-P10 Wilding conifers Avoid the spread of wilding conifers by: prohibiting planting of	Support	Supports the policy, but notes there is no incentive for landowners to remove wilding conifers and questions the effectiveness without council support.	Seeks to retain as notified but consider deleting clause (2) if there is no intention of following through.
290.184	Philip and Becky Wilson	Natural Features and Landscapes	NFL-P11 Enhancement and restoration of Outstanding Natural Features and Landscapes, Significan	Support	Supports in part the policy to enhance and restore landscape areas but suggests restoration should only occur where appropriate.	Seeks to amend as follows: Support the enhancement and where appropriate the restoration of Waitaki's Outstanding Natural Features and Landscapes, Significant Natural Features and Rural Scenic Landscapes where their values have been lost or degraded by:
290.185	Philip and Becky Wilson	Natural Features and Landscapes	NFL-R1 Buildings and structures (excluding fences) on or within Outstanding Natural Features o	Oppose	Opposes the rule as considers that small-scale farm buildings should bepermittedas they are compatible with landscape management. Considers that if the ONF boundaries can be rationalised to only areas that are genuinely natural (not improved pasture) then NFL-R1 could be supported.	Seeks to amend as follows: Activity status: Permitted Where: PER-1 The structure is underground; or PER-2 The building or structure is for primary production purposes, excluding residential units; and PER-3 The building or structure does not exceed 30m2; and PER-4 The building or structure does not exceed 3m in height; and PER-5The building or structurecomplies withthe following standard: 1. NFL-S1
290.186	Philip and Becky Wilson	Natural Features and Landscapes	NFL-R2 Buildings and structures (excluding fences) on or within Significant Natural Features o	Support	Supports in part but considers the rule should allow for minor buildings on Significant Natural Features as per the relief sought in submission point 298.185 or the same thresholds as in RSL.	Seeks to amend as follows: Activity status: Permitted Where:

						PER-1 The structure is underground; or PER-2 The building or structure is in a Rural Scenic Landscape ~~(except where it is also located on a Significant Natural Feature);~~and ...
290.187	Philip and Becky Wilson	Natural Features and Landscapes	NFL-R3 Permanent fencing on or within Outstanding Natural Features or Landscapes, Significant	Support	Supports in part but considers deer fencing up to 2.5m high be permitted for pest management.	Seeks to amend as follows: PER-2 Any fence or gates are no more than 1.5m high (except any deer fence which can be up to ~~2m~~2.5m high).
290.188	Philip and Becky Wilson	Natural Features and Landscapes	NFL-R4 Earthworks on or within Outstanding Natural Features or Landscapes or Significant Natur	Support	Supports in part but only if improved pasture is removed from ONFL overlays, otherwise, GRUZ earthworks rules should apply. Considers that earthworks are often needed to install tracks to give access for conservation efforts.	Seeks to conditionally retain as notified.
290.189	Philip and Becky Wilson	Natural Features and Landscapes	NFL-R5 Primary production activities (excluding buildings, mining activities, quarrying activi	Support	Supports the policy with modifications to the definition of agricultural intensification and requests removal of improved pasture from overlays.	Supports the policy with modifications to the definition of agricultural intensification and requests removal of improved pasture from overlays.
290.190	Philip and Becky Wilson	Natural Features and Landscapes	NFL-R6 Amenity planting and shelterbelts on or within Outstanding Natural Features or Landscap	Support	Supports permitting amenity planting and shelterbelts in landscape areas, provided the mapping inaccurate.	Seeks to retain as notified.
290.191	Philip and Becky Wilson	Natural Features and Landscapes	NFL-R7 Outdoor recreational activities (excluding buildings) on or within Outstanding Natural	Support	Supports the rule with modification to exclude not-for-profit and charities from the definition of commercial activities.	Seeks to amend the definition of commercial activities and seeks to add a permitted activity criteria specifically for temporary events, or an advice note advising that the Temporary Events chapter overrides NFL-R7.
290.192	Philip and Becky Wilson	Natural Features and Landscapes	NFL-R8 Landscape restoration activities on or within Outstanding Natural Features or Landscape	Support	No specific reason given.	Seeks to retain as notified.
290.193	Philip and Becky Wilson	Natural Features and Landscapes	NFL-R9 Flood protection structures and flood protection works on or within Outstanding Natural	Support	Supports with modification to allow all people, not just councils, to undertake flood protection works.	Seeks deletion of PER-1 If retained, seeks to add a note to advise that emergency works are permitted under the RMA.
290.194	Philip and Becky Wilson	Natural Features and Landscapes	NFL-R10 Plantation Forestry within or on Significant Natural Features or Rural Scenic Landscap	Support	No specific reason given.	Seeks to retain as notified.
290.195	Philip and Becky Wilson	Natural Features and Landscapes	NFL-R11 Mining activities and/or quarrying activities (excluding existing farm quarries) withi	Support	Supports with modifications to protect existing quarrying and mining activities. [refer to original submission]	Seeks to amend as follows:

						Mining activities and/or quarrying activities (excluding existing ~~farm quarries~~quarrying activity) within or on Significant Natural Features or Rural Scenic Landscapes [refer to original submission for full relief sought]
290.196	Philip and Becky Wilson	Natural Features and Landscapes	NFL-R12 Mining activities and/or quarrying activities (excluding existing farm quarries) on or	Support	Supports with modifications to protect existing quarrying and mining activities. [refer to original submission]	Seeks to amend as follows: Mining activities and/or quarrying activities (excluding existing ~~farm quarries~~ quarrying activity) within or on Significant Natural Features or Rural Scenic Landscapes [refer to original submission for full relief sought]
290.197	Philip and Becky Wilson	Natural Features and Landscapes	NFL-R13 Intensive indoor primary production and intensive outdoor primary production within or	Oppose	Opposes in part and considers restricted discretionary status is more appropriate instead of non-complying as parts of the RSL may be appropriate, particularly where land is already irrigated and developed.	Seeks to amend NFL-R13 from non-complying activity status to restricted discretionary with the matters of discretion being the same as NFL-R10.
290.198	Philip and Becky Wilson	Natural Features and Landscapes	NFL-R14 Plantation Forestry on or within Outstanding Natural Features or Landscapes All	Support	No specific reason given.	Seeks to retain as notified.
290.199	Philip and Becky Wilson	Natural Features and Landscapes	NFL-R15 Planting species that can result in wilding conifers on or within Outstanding Natural	Support	No specific reason given.	Seeks to retain as notified.
290.200	Philip and Becky Wilson	Natural Features and Landscapes	NFL-R16 Intensive indoor primary production and intensive outdoor primary production on or wit	Support	No specific reason given.	Seeks to retain as notified.
290.201	Philip and Becky Wilson	Natural Features and Landscapes	NFL-S1 Standards for colours of buildings and structures in landscapes Buildings and st	Support	No specific reason given.	Seeks to retain as notified.
290.202	Philip and Becky Wilson	Public Access	PA-O1 Public and customary access Public and customary access is protected, maintained,	Support	No specific reason given.	Seeks to retain as notified.
290.203	Philip and Becky Wilson	Public Access	PA-O2 Provision of public access minimises adverse effects Public access to and along t	Support	No specific reason given.	Seeks to retain as notified.
290.204	Philip and Becky Wilson	Public Access	PA-P1 Activities that protect and maintain public and customary access Enable activitie	Support	No specific reason given.	Seeks to retain as notified.

290.205	Philip and Becky Wilson	Public Access	PA-P2 Mechanisms for improving public access Protect, maintain and enhance public acces	Oppose	Opposes in part the policy encouraging public access opportunities in land use applications but considers it is too ambiguous without rules and could pressure applicants and suggests limiting to esplanade reserves/strips whereappropriate througha subdivision process.	Seeks to amend as follows: Protect, maintain and enhance public access by: ~~1. encouraging opportunities and mechanisms to maintain and enhance public access when a land use application provides an opportunity for access; and~~ ~~2.~~1. requiring the creation of esplanade reserves and esplanade strips where appropriate in accordance with the Subdivision Chapter, ~~with priority given~~along the waterways listed in SCHED11 – Priority Areas for Public Access and Esplanade Strips, and lakes larger than 8 hectares.
290.206	Philip and Becky Wilson	Public Access	PA-P3 Consideration of adverse effects on public access When considering any applicatio	Support	Supports the policy but considers it should apply only to public land, not private land.	Seeks to amend as follows: When considering any application for resource consents, have regard to any adverse effects of the proposed activity on public access routes and access points on public land.
290.207	Philip and Becky Wilson	Activities on the Surface of Water	General	Support	General support for the chapter.	Seeks to retain as notified -except for submission points that follow.
290.208	Philip and Becky Wilson	Activities on the Surface of Water	ASW-P2 Commercial activities Provide for commercial surface water activities where it can	Support	Supports the policy for commercial activities on water, with a request to redefine 'commercial activities' as submitted in the definitions chapter.	Supports the policy for commercial activities on water, with a request to redefine 'commercial activities' as submitted in the definitions chapter.
290.209	Philip and Becky Wilson	Activities on the Surface of Water	ASW-R1 Use of vessels for a recreational activity All zones Activity status: Permitted	Amend	Considers that prescribed noise limits for vessels may create reverse sensitivity for recreational lake use as houses are built nearby and suggests protecting existing uses.	Seeks to amend as follows: PER-2 The following noise limits are not exceeded at a notional boundary established prior to 1st March 2025:
290.210	Philip and Becky Wilson	Light	General	Support	Support for the chapter.	Seeks to retain as notified.
290.211	Philip and Becky Wilson	Noise	General	Support	No specific reasons given	Retain as notified
290.212	Philip and Becky Wilson	Signs	General	Support	General support for the chapter.	Seeks to retain as notified except for the submission points that follow.
290.213	Philip and Becky Wilson	Signs	SIGN-R7 Signs attached to a trailer, vehicle or vessel All zones Activity status: Non	Amend	Considers that the rule controlling signs on vehicles/trailers is ambiguous and may cause arbitrary decision-making and suggests clarifying exemptions for company vehicles and business operations.	Seeks to amend as follows: This rule does not apply to: 1.~~an advertising~~sign painted or adhered directly onto company/fleet vehicles or trailers ~~which is incidental to the primary use of that vehicle or trailer;~~ or 2. an advertising sign painted or adhered directly onto company/fleet vehicles or trailers ~~which are used in the day-to-day operation of that business;~~or 3. businesses operating from a vehicle. ~~truck or caravan such as food vendors.~~

290.214	Philip and Becky Wilson	Temporary Activities	General	Support	Support for chapter with modification to remove the word 'light' from 'light aircraft' as this is not defined. Also refer to submission point on definitions chapter related to 'temporary activities'.	Seeks to replace ‘helicopter’ and ‘light aircraft’ with ‘aircraft' throughout the chapter.
290.215	Philip and Becky Wilson	Temporary Activities	TEMP-R6 Temporary helicopter and light aircraft take-offs and landings, excluding Ōamaru Airpo	Support	Considers that 'helicopter' is not a defined term and should be replaced with 'aircraft' [refer to submission point on definitions chapter related to 'temporary activities']	Seeks to replace ‘helicopter’ and ‘light aircraft’ with ‘aircraft' throughout the chapter.
290.216	Philip and Becky Wilson	General Rural Zone	GRUZ-O1 Purpose of the General Rural Zone The General Rural Zone provides for primary p	Support	Support the purpose of the general rural zone for primary production and that the rural zone provides vital socio-economic benefits to the District.	Retain as notified
290.217	Philip and Becky Wilson	General Rural Zone	GRUZ-O2 Character of the General Rural Zone The character of the General Rural Zone rem	Support	Support while recognising that odours are managed by the regional council. Support that primary production contributes to open character and maintenance of rural landscapes, and that a degree of built form is necessary to support the ongoing productivity of the rural zone.	Retain as notified
290.218	Philip and Becky Wilson	General Rural Zone	GRUZ-O3 Highly productive land The value and long-term benefits of using highly product	Support	Support - managing highly productive land is important to retain and support primary production in the rural environment, particularly where land is identified as being highly productive.	Retain as notified
290.219	Philip and Becky Wilson	General Rural Zone	GRUZ-O4 Rural amenity values A range of activities anticipated in the General Rural Zon	Support	Support for objective but considers there should be clearer guidance or a definition of rural amenity values.	Seeks to define 'rural amenity values' as follows: include open space, primary production, low population and building density, pastoral and arable character interspersed with indigenous biodiversity, relative quietness compared to urban areas, and connection to land for cultural, recreational and historic reasons.
290.220	Philip and Becky Wilson	General Rural Zone	GRUZ-O5 Business development in rural areas Rural areas are retained for primary produc	Support	Support -recognition is important for enabling appropriate rural-based business activities that complement the zone’s purpose.	Retain as notified
290.221	Philip and Becky Wilson	General Rural Zone	GRUZ-P1 Protection of highly productive land Protect highly productive land for use by	Support	Support - important that identified highly productive land is protected for primary production.	Retain as notified
290.222	Philip and Becky Wilson	General Rural Zone	GRUZ-P2 Development in the General Rural Zone Maintain the rural character in the Gener	Support	Support for intent to maintain rural character while allowing flexibility for ancillary activities and existing uses, encouraging appropriate indigenous planting, and enabling quality staff housing and additional dwellings and recognising the diverse residential needs of rural operations without compromising housing standards.	Seeks to amend as follows: ... 4. encouraging the maintenance and enhancement of existing, and the planting of new, indigenous vegetation where appropriate; and 5. providing for conservation activities; and 6. recognising and providing for lawfully established rural activities and minimising reverse sensitivity effects on primary production and ancillary activities of new development in the General Rural

						Zone; and 7. providing for a ~~single~~ minor residential unit on sites to facilitate residential choice and flexibility ~~while ensuring that the minor residential unit is subservient to the principal residential unit on the site.~~ 8. providing for multiple residential units on large sites to facilitate staff accommodation while ensuring building density isappropriate forthe General Rural Zone.
290.223	Philip and Becky Wilson	General Rural Zone	GRUZ-P3 Design of development in rural areas Ensure that new development is well design	Support	Support for intent to ensure new development is appropriate for the environment and buildings and structures are necessary to support primary production.	Retain as notified
290.224	Philip and Becky Wilson	General Rural Zone	GRUZ-P4 Maintenance of clear urban, rural lifestyle and rural areas Maintain a clear di	Support	Support intent where there is a distinguishment of urban and rural environments but encourage flexibility for primary production activities on the rural fringe where adverse effects can be appropriately managed.	Seeks to amend as follows: Maintain a clear distinction between urban, rural lifestyle and rural areas through the use of clear land use zones and avoidance of ad-hoc subdivision where growth to Settlement or Rural Lifestyle zones has not been planned for unless the adverse effects can be avoided, remedied or mitigated.
290.225	Philip and Becky Wilson	General Rural Zone	GRUZ-P5 Intensive primary production Provide for intensive indoor primary production an	Support	Support as important that provision is made for intensive primary production in the rural zone where effects can be appropriately managed.	Retain as notified
290.226	Philip and Becky Wilson	General Rural Zone	GRUZ-P6 Integration of primary production with natural and cultural values Recognise th	Support	Support but seeks clarification that sensitive values do not apply across the entire GRUZ zone and recommend limiting specialist reports to identified overlays, and advocate for enabling new primary production activities.	Seeks to amend as follows: Recognise the importance of the identified landscape, heritage, biodiversity and mana whenua values and provide for continued and new primary production in these areas while avoiding, remedying or mitigating any adverse effects on the values.
290.227	Philip and Becky Wilson	General Rural Zone	GRUZ-P7 Intensive primary production and extractive industries in close proximity to settlemen	Support	Support intent that any new primary production and extractive industries avoid adverse effects on existing settlements.	Retain as notified
290.228	Philip and Becky Wilson	General Rural Zone	GRUZ-P8 Energy and resource efficiency Encourage minimisation of energy and water use a	Support	Support intent to promote energy and resource efficiency where appropriate, but notes that the Energy chapter lacks sufficient permissiveness to effectively implement the policy.	Seeks to amend as follows: Encourage minimisation of energy and water use and the use of low impact design such as optimal site layout, passive solar design, solar power and water heating, and greywater recycling for any new development, where appropriate.
290.229	Philip and Becky Wilson	General Rural Zone	GRUZ-P9 Outline Development Plans Provide for any substantial development extension of	Support	Support with clarification that recreational, heritage, and ecological values should be limited to those identified in the plan to avoid unnecessary reporting, and suggest using covenants or separation distances to manage adverse effects on new dwellings near the General Rural Zone.	Seeks to amend as follows: ...

						c. retains and supports the relationship to, and where possible enhances, identified recreational, heritage and ecological features and values; and d. is co-ordinated with the delivery of appropriate infrastructure; and e. achieves a high level of amenity; and f. specifies covenants and/or provides a sufficient separation distance of habitable buildings with the General Rural Zone to minimise the potential for reverse sensitivity effects.
290.230	Philip and Becky Wilson	General Rural Zone	GRUZ-R1 Building activity General Rural Zone Activity status: Permitted Where: PER-	Support	Support rule to provide for building activity in the rural zone and default to restricted discretionary where compliance cannot be achieved.	Retain as notified
290.231	Philip and Becky Wilson	General Rural Zone	GRUZ-R2 Primary production (excluding carbon forestry otherwise provided for in GRUZ-R18, mini	Support	Support rule advocating for the protection of existing mining and quarrying activities in the General Rural Zone and affirm that primary production is appropriately located within this zone.	Seeks to amend as follows: Primary production (excluding carbon forestry otherwise provided for inGRUZ-R18, new mining activity, new quarrying activities, new intensive indoor primary production and new intensive outdoor primary production)
290.232	Philip and Becky Wilson	General Rural Zone	GRUZ-R3 Amenity planting and shelterbelts General Rural Zone Activity status: Permitt	Support	Support with amendments to clarify that PER-1 may overly restrict amenity planting due to broad pest species criteria, and that PER-2 should regulate actual effects rather than speculative ones.	Seeks to amend as follows: PER-1 The amenity planting or shelterbelt does not involve planting of species that are, ~~or can become,~~pest species as identified in any Regional Pest Management Plan; and PER-2 The amenity planting ~~will~~does not shade any existing adjoining residential unit between the hours of 9:00am and 4:00pm, or any formed public road between 10:00am and 2:00pm, on the shortest day of the year; and...
290.233	Philip and Becky Wilson	General Rural Zone	GRUZ-R4 Residential activity General Rural Zone Activity status: Permitted Activity	Support	No specific reason given	Retain as notified
290.234	Philip and Becky Wilson	General Rural Zone	GRUZ-R5 Residential unit General Rural Zone Activity status: Permitted Where: PER-1	Support	No specific reason given	Retain as notified
290.235	Philip and Becky Wilson	General Rural Zone	GRUZ-R6 Accessory building General Rural Zone Activity status: Permitted Activity s	Support	No specific reason given	Retain as notified
290.236	Philip and Becky Wilson	General Rural Zone	GRUZ-R7 Minor residential unit General Rural Zone Activity status: Permitted Where:	Support	Support in part, recommending it apply only to smaller sites, with staff housing for larger farms permitted through other provisions to ensure adequate and appropriate accommodation for rural workers.	Retain as notified

290.237	Philip and Becky Wilson	General Rural Zone	GRUZ-R8 Visitor accommodation General Rural Zone Activity status: Permitted Where:	Support	Support but recommend amending the five-person limit to better reflect actual building capacity and accommodate larger groups, such as tour parties, where adverse effects can be appropriately managed.	Seeks to amend as follows: PER-1 The visitor accommodation is limited to homestays accommodating no more than ~~5~~ 10 visitors at any one time; and
290.238	Philip and Becky Wilson	General Rural Zone	GRUZ-R9 Home business (excluding primary production activity) General Rural Zone Acti	Support	Support for enabling employment and entrepreneurialism in the rural zone, noting that effects like noise and visual impact are typically well managed through existing provisions, and recommend flexibility for outdoor storage and activities, with screening requirements clearly defined and not overly restrictive.	Seeks to amend as follows: ~~PER-1~~ ~~No more than 40m2 of the gross floor area of all buildings on the site is used for the home business; and~~ ~~PER-2~~PER-1 No more than one full time employee, or equivalent, ~~engaged in~~ working at the site of the home business, resides off-site; and ~~PER-3~~PER-2 No more than 2 heavy vehicle movements, and a total of 20 vehicle movements are generated in a 24-hour period for the home business; and ~~PER-4~~PER-3 Any on-site storage of materials associated with the home business is undertaken within buildings on the site or is screened to a height of at least 1.2m from adjoining roads and sites; and ~~PER-5~~PER-4 The manufacturing, altering, repairing, dismantling or processing of any goods, or articles associated with the home business, take place within a building or is screened to a height of at least 1.2m from adjoining roads and sites.
290.239	Philip and Becky Wilson	General Rural Zone	GRUZ-R10 Intensive indoor primary production and intensive outdoor primary production G	Support	Support with modifications to avoid duplication of effluent consent requirements already managed by the Regional Council and recommend aligning any remaining provisions with Regional Council's 150m notification threshold.	Seeks to amend as follows: PER-2 1. housed pigs are located no closer than 500m to a property boundary; and ~~2. no disposal or storage of effluent within 500m of a residential unit on any other site; and~~ 3. no intensive indoor primary production or intensive outdoor primary production of pigs occurs within ~~2 kilometres~~ 150m of a Residential, Settlement, or Open Space Zone; or PER-3 ... ~~2. no disposal or storage of effluent within 500m of a residential unit on any other site; and~~ 3. no intensive indoor primary production or intensive outdoor

						primary production of poultry occurs within ~~2 kilometres~~150m of a Residential, Settlement or Open Space Zone; or PER-4 For intensive indoor primary production or intensive outdoor primary production of any other species, there is: ~~1. no disposal or storage of effluent within 500m of a residential unit on any other site; and~~ 2. a setback of at least ~~2 kilometres~~150m from a Residential, Settlement or Open Space Zone.
290.240	Philip and Becky Wilson	General Rural Zone	GRUZ-R11 Recreational activity General Rural Zone Activity status: Permitted Activi	Support	No specific reasons given	Retain as notified
290.241	Philip and Becky Wilson	General Rural Zone	GRUZ-R12 Flood protection structures General Rural Zone Activity status: Permitted	Support	No specific reasons given	Retain as notified
290.242	Philip and Becky Wilson	General Rural Zone	GRUZ-R13 Conservation activities General Rural Zone Activity status: Permitted Acti	Support	No specific reasons given	Retain as notified
290.243	Philip and Becky Wilson	General Rural Zone	GRUZ-R14 Commercial activity General Rural Zone Activity status: Permitted Where: P	Support	Support with amendments to allow farm shops to sell a broader range of locally produced primary goods, ideally within a100km radius, while maintaining rural character and avoiding expansion into general retail.	Seeks to amend as follows: PER-1 Retail sales are limited to: 1. food sourced from primary production activities within a 100km radius of the site ~~farming produce (including milk, fruit, vegetables, plants, flowers, or eggs) produced on the site, or honey processed on the site; or~~
290.244	Philip and Becky Wilson	General Rural Zone	GRUZ-R15 Aeroplane airstrips and helicopter landing areas, and the use of these by aircraft	Oppose	Considers that the aircraft movement limit should be increased to 32 per month for flexibility, and that no limit should apply where sufficient setbacks ensure there are no adverse effects at the nearest boundary.	Seeks to amend as follows: PER-3 The use of the landing area or airstrip is for any other activity which results in no more than ~~8 aircraft movements per week (4 take-offs and 4 landings)~~ 32 aircraft movements per month; or PER-4 The airstrip is more than 1,000m from the nearest notional boundary under different ownership; or ...
290.245	Philip and Becky Wilson	General Rural Zone	GRUZ-R16 Papakāika within land held under Te Ture Whenua Māori Act 1993 or within a Native Res	Support	No specific reasons given	Retain as notified
290.246	Philip and Becky Wilson	General Rural Zone	GRUZ-R17 Seasonal Worker accommodation General	Oppose	Supports the need for seasonal worker housing but oppose limitations that encourage sub-standard accommodation,	Seeks to amend as follows:

			Rural Zone Activity status: Permit		advocating instead for flexible, self-contained, and higher-quality options that respect the dignity and needs of workers.	PER-1 The minor residential unit or building ~~and/or any campsite~~ is only to be used by workers employed on the site; and PER-2 The seasonal worker accommodation is located on a site that is a minimum of 20ha; and ~~PER-3~~ ~~Any building is relocatable or able to be reconfigured to a building accessory to land-based primary production; and~~ ~~PER-4~~ ~~Any seasonal worker accommodation contains no more than one kitchen facility; and~~ PER-5 ~~Any building used for seasonal worker accommodation is no more than 125m2 gross floor area; and~~ PER-6 Any building used for seasonal worker accommodation provides for a maximum of 10 occupants; and ~~PER-7~~ ~~The maximum area used for camping as part of any seasonal worker accommodation shall be 1000m2 and be located at least 100m from any residential unit on an adjoining site.~~
290.247	Philip and Becky Wilson	General Rural Zone	GRUZ-R18 Carbon forestry General Rural Zone Activity status: Permitted Where: PER-1	Support	Support with modifications to permit suitable indigenous species for carbon forestry, align setback rules with biodiversity provisions, correct wording around pest species, and remove unnecessary restrictions that conflict with broader planobjectivesto enhance native biodiversity.	Seeks to amend as follows: PER-1 The species of planting are indigenous ~~to the ecological district in which the activity is to take place~~; and ... PER-4 ~~4. within 10m of a Significant Natural Area; and~~ PER-5 The carbon forestry activity ~~does not involve the plantingavoids~~ an increase in scale or intensity of any pest, pest agent, or organism of interest identified in the relevant Regional Pest Management Plan; and ~~PER-6~~ ~~The carbon forestry utilises no more than 50% of any site.~~

290.248	Philip and Becky Wilson	General Rural Zone	GRUZ-R19 Rural Industry General Rural Zone Activity status: Restricted Discretion	Support	Support with more permissive settings to reflect the functional and operational needs of rural industries, noting that site design and infrastructure are developer decisions and that adverse effects are already managed through other chapters in the plan.	Seeks to amend as follows: Activity status: ~~Restricted Discretionary~~Permitted Where: PER-1 The activity is not a potentially high-impact industrial activity. Note: consent may be required under the Transport chapter. ~~Matters of discretion are restricted to:~~ ~~1. the suitability of the location, site design and layout; and~~ ~~2. the intensity and scale of the activity; and~~ ~~3. the extent of adverse effects on existing or permitted activities; and~~ ~~4. the extent of adverse effects on the safe and efficient operation of the road network, and suitability of onsite loading, manoeuvring and access; and~~ ~~5. the provision of infrastructure to service the activity.~~
290.249	Philip and Becky Wilson	General Rural Zone	GRUZ-R20 Papakāika where not otherwise provided for under GRUZ-R16 General Rural Zone	Support	No specific reasons given	Retain as notified
290.250	Philip and Becky Wilson	General Rural Zone	GRUZ-R21 Community facility General Rural Zone Activity status: Discretionary Activ	Support	No specific reasons given	Retain as notified
290.251	Philip and Becky Wilson	General Rural Zone	GRUZ-R22 Industrial activity General Rural Zone Activity status: Discretionary Acti	Support	No specific reasons given	Retain as notified
290.252	Philip and Becky Wilson	General Rural Zone	GRUZ-R23 Any other activity not provided for as a permitted, restricted discretionary, non-com	Support	No specific reasons given	Retain as notified
290.253	Philip and Becky Wilson	General Rural Zone	GRUZ-R24 Retirement village General Rural Zone Activity status: Non-Complying Activ	Support	No specific reasons given	Retain as notified
290.254	Philip and Becky Wilson	General Rural Zone	GRUZ-R25 Educational facility General Rural Zone Activity status: Non-Complying Act	Oppose	Opposes the non-complying activity status for schools in rural zones and considers that their rural character typically minimises	Seeks to amend the activity to a permitted activity with appropriate setbacks for buildings for the educational facility or restricted discretionary.

					reverse sensitivity risks and that access to education should be balanced with protecting primary production.	
290.255	Philip and Becky Wilson	General Rural Zone	GRUZ-S1 Residential site density The maximum density of residential units on any site	Support	No specific reasons given	Retain as notified
290.256	Philip and Becky Wilson	General Rural Zone	GRUZ-S2 Maximum height All building and structures must not exceed a maximum height of	Support	Support GRUZ-S2 with amendment to reflect that grain silos can be up to 25m in height.	Seeks to amend as follows: 1. All building and structures must not exceed a maximum height of: ... 2.~~15m~~25m for grain silos; ...
290.257	Philip and Becky Wilson	General Rural Zone	GRUZ-S3 Building coverage The building coverage for any site shall not exceed 20%. Rai	Support	No specific reasons given	Retain as notified
290.258	Philip and Becky Wilson	General Rural Zone	GRUZ-S4 Road and rail setbacks A stock loading ramp or race with its entry/exit point	Support	Support with modification to allow stock loading ramps angled to the road, provided there is at least 30m of space to accommodate full off-road parking and manoeuvring.	Seeks to amend as follows: 1. A stock loading ramp or race with its entry/exit point located facing a road, including a State Highway, shall not be located within ~~a~~30m ~~setback~~from the road boundary in the direction the loading ramp faces. 2. A stock loading ramp or race with its entry/exit point running parallel or away fromto the road is exempt from this standard.
290.259	Philip and Becky Wilson	General Rural Zone	GRUZ-S5 Internal boundary setbacks The minimum setback of any part of a building or str	Support	No specific reason given	Retain as notified
290.260	Philip and Becky Wilson	General Rural Zone	GRUZ-S6 Frontage fencing Any fencing within a road boundary setback or internal bounda	Support	Support with modification to exempt the curtilage of residential and minor residential units, allowing more residential-style fencing around homes while retaining appropriate rural fencing elsewhere in the zone.	Seeks to amend as follows: 1. Any fencing within a road boundary setback or internal boundary setback shall be post and netting, post and wire, or post and rail fencing. 2. Fencing of residential units and minor residential units is exempt from this standard.
290.261	Philip and Becky Wilson	General Rural Zone	GRUZ-S7 Crop protection structures Dark green or black cloth is used for all vertical	Oppose	Considers there should be justification for colour and size restrictions.	Seeks to delete or provide evidence or justification for colour and size restrictions.
290.262	Philip and Becky Wilson	General Rural Zone	GRUZ-S8 Hours of operation Any activity (other than a residential activity or visitor	Support	Support intent to limit hours for rural amenity protection but considers the matters of discretion should also address potential reverse sensitivity effects on primary production activities.	Seeks to amend as follows: Matters of discretion are restricted to: ... 2. any adverse effects on the amenity values of properties on any adjoining residential sites; and 3. any reverse sensitivity effects on primary production.

290.263	Philip and Becky Wilson	General Rural Zone	GRUZ-S9 Servicing and firefighting water supply and access All new buildings must be c	Oppose	Oppose in part, supporting its intent to ensure buildings are appropriately serviced but recommending flexibility for farm and accessory buildings that do not require reticulated services to avoid unrealistic expectations.	Seeks to amend as follows: 1. All new residential buildings must be connected to reticulated services where these are available; and 2. All new residential buildings must comply with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PA 4509:2008 unless written approval is provided from Fire and Emergency New Zealand regarding an alternative firefighting water supply.
290.264	Philip and Becky Wilson	Transport	TRAN-O1 On-site transport facilities and access Use and development has safe and effective	Support	No specific reason given	Retain as notified
290.265	Philip and Becky Wilson	Transport	TRAN-O2 High trip generating use and development The safety and efficiency of the transpor	Support	No specific reason given	Retain as notified
290.266	Philip and Becky Wilson	Transport	TRAN-O3 Transport network The transport network is effective, accessible and integrated	Support	No specific reason given	Retain as notified
290.267	Philip and Becky Wilson	Transport	TRAN-P1 High trip generating use and development Provide for high vehicle trip generato	Support	Support with modification to clarify the term 'surrounding area' in Point 5, as it is currently vague and may lead to inconsistent interpretation.	Seeks to amend as follows: ... 5. the effect of the proposed activity on the character and amenity values of the surrounding ~~area~~ adjoining sites; and ...
290.268	Philip and Becky Wilson	Transport	TRAN-P2 Appropriate on-site transport facilities Enable on-site transport facilities where	Oppose	Opposes the policy as it addresses only on-site effects and considers that internal site use is typically managed by landowners and industry standards, and that provisions should focus on impacts beyond the site to align with TRAN-O1 and avoid unnecessary safety risks.	Seeks to amend as follows: Enable on-site transport facilities where these: 1. meet industry standards; and 2. are of a location and design that provides for: a. public health and safety; and ~~b. the safe and efficient use of the site; and~~ c. the safe and efficient functioning of the transport network; and d. the reasonable loading and access demands generated by the use of the site; and e. the safe and effective access for firefighting purposes. ~~3. promote the uptake and use of the active transport network.~~
290.269	Philip and Becky Wilson	Transport	TRAN-P3 Potentially appropriate on-site transport facilities Only allow for on-site tra	Oppose	Considers the policy unnecessary as relevant matters are already addressed unless they regulate internal effects. Considers it should focus solely on firefighting access and remove provisions targeting off-site effects.	Amend as follows: Only allow for on-site transport facilities that do not meet industry standards where it can be demonstrated, if applicable, that:

						~~1. the design is in response to site and/or topographical constraints; and~~
290.270	Philip and Becky Wilson	Transport	TRAN-P4 Vehicle crossings Provide for safe and efficient connections between the transp	Support	Support to the extent that it applies to new vehicle crossings.	Seeks to amend as follows: Provide for safe and efficient connections between the transport network and on-site transport facilities by requiring new vehicle crossings to roads to address: ...
290.271	Philip and Becky Wilson	Transport	TRAN-P5 Regionally Significant Infrastructure Recognise the social, economic, cultural	Support	Support, particularly the definition of Regionally Significant Infrastructure.	Retain as notified
290.272	Philip and Becky Wilson	Transport	TRAN-P6 Multi-modal and active transport Encourage activities to incorporate opportunitie	Oppose	Considers to be overly strong in wording and that cycling/pedestrian modes are more hazardous and should not be encouraged where full cycling infrastructure is not available.	Seeks to amend as follows: ~~Encourage~~Promote activities to incorporate opportunities for multi-modal and active transport, including cycle parking and end of trip facilities if the site is served by the active transport network where it separates cyclists and pedestrians.
290.273	Philip and Becky Wilson	Transport	TRAN-P8 Upgrading of the transport network Provide for the upgrading or development of	Support	Considers clearer guidance needed on when to respond to earthworks effects, suggesting the policy be limited to landscape and ecological values identified in overlays and chapters of the plan.	Seeks to amend as follows: ... 8. responds to site and topographical constraints including opportunities to reduce the effects of earthworks on identified landscape and ecological values.
290.274	Philip and Becky Wilson	Transport	TRAN-P9 Roads as infrastructure corridors Encourage the use of roads as infrastructure	Support	No specific reason given	Retain as notified
290.275	Philip and Becky Wilson	Transport	TRAN-P10 Road classification Classify roads according to their function and anticipated	Support	No specific reason given	Retain as notified
290.276	Philip and Becky Wilson	Transport	General	Oppose	Considers that rural zones should be exempt from policies that may pressure developers to fund cycle and footpaths where they offer no practical benefit and seeks clarification that policies apply only to new activities, noting that technical evidence from the WDC roading department is needed to support provisions for road crossings.	Seeks to have submission points considered across all TRAN provisions and for the roading department to reply to this submission at further hearings commenting on the TRAN chapter overall.
290.277	Philip and Becky Wilson	Transport	TRAN-R1 Vehicle crossings onto roads All zones Activity status: Permitted Where: PE	Support	Support for new vehicle crossings subject to submission point*298.276*. [*list previous submission point #]	Seeks to amend as follows: TRAN-R1 New Vehicle crossings onto roads

290.278	Philip and Becky Wilson	Transport	TRAN-R2 Site access for activities without any on-site vehicle parking space or loading spaces	Support	Support with modifications to clarify that pedestrian and cycling access requirements should not apply in zones where vehicle travel is operationally necessary, such as due to distance.	Seeks to amend as follows: TRAN-R2 Site access for new activities without any on-site vehicle parking space or loading spaces PER-1 All of the following standards are compiled with where relevant: 1. TRAN-S1 Pedestrian and cycling access in Residential Zones. 2. TRAN-S2 Firefighting access
290.279	Philip and Becky Wilson	Transport	TRAN-R3 On-site parking, loading, and access All zones Activity status: Permitted W	Oppose	Considers the provision overregulates internal site effects unrelated to the transport network, particularly dairy lanes and private access already covered under TRAN-S3, and finds TRAN-S5 overly restrictive by limiting vehicle standing, queuing, and maneuvering within a site that are inherent and internal and should not be subject to standards.	Seeks to deleteTRAN-S7 and TRAN-S8 from the rule.
290.280	Philip and Becky Wilson	Transport	TRAN-S9 Accessible parking spaces Where parking spaces are provided on site: any on-si	Support	Support subject to submissions from disability advocate organisations, particularly with reference to rural sites.	Retain as notified
290.281	Philip and Becky Wilson	Transport	TRAN-S10 Design requirements for on-site vehicle parking spaces Where parking spaces ar	Oppose	Considers the managing of internal site effects inconsistent with TRAN-O1 and recommends it be amended to clarify that it does not apply to rural or residential zones.	Seeks to provide clarification that the standard does not apply to rural and residential zones.
290.282	Philip and Becky Wilson	Transport	TRAN-S11 Surface of parking and loading areas The surface of all parking and loading a	Oppose	Considers that setting a low car park threshold would place undue burden on rural zones, and that regulating internal site effects is inconsistent with TRAN-O1.	Seeks to provide clarification that the standard does not apply to rural and residential zones.
290.283	Philip and Becky Wilson	Transport	TRAN-S12 On-site cycle parking All developments, excluding residential units and prima	Amend	Considers that while TRAN-S12 excludes primary production, it should also exclude rural zones due to long travel distances and lack of separated cycleways, noting that many related standards are similarly irrelevant in rural contexts.	Seeks to provide clarification that the standard does not apply to rural zones.
290.284	Philip and Becky Wilson	Transport	TRAN-S12 On-site cycle parking All developments, excluding residential units and prima	Oppose	Considers standard to be overly prescriptive regarding the standard of cycle parking.	Seeks to provide clarification that the standard does not apply to rural and residential zones
290.285	Philip and Becky Wilson	Transport	TRAN-R3 On-site parking, loading, and access All zones Activity status: Permitted W	Oppose	Opposes incorporating Australian and New Zealand Standards by reference in the district plan due to their cost, copyright restrictions, external review processes, and inefficiency and considers the PDP should include locally specified standards to avoid financial barriers and regulatory outsourcing.	Seeks to use standards acceptable to the WDC roading department which are written into the plan to be freely available. Delete TRAN-R3. Alternatively, ifretainedsees to amend as follows All zones except Rural Lifestyle Zone, General Rural Zone,MacraesMiningZoneand Settlement Zone.

						PER-1 All of the following standards are complied with where relevant; 1. TRAN-S2 Firefighting access; ~~2. TRAN-S3 Service lanes, private ways, private roads, pedestrian accessways and walkways;~~ ~~3. TRAN-S4 Reverse maneuvering;~~ ~~4. TRAN-S5 Design standards for vehicle maneuvering areas;~~ 5. TRAN-S6 Service stations and truck stops; ~~6. TRAN-S7 On-site loading spaces for non-residential activities;~~ ~~7. TRAN-S8 Design requirements for loading and vehicle standing spaces;~~ 8. TRAN-S9 Accessible parking spaces; ~~9. TRAN-S10 Design requirements for on-site vehicle parking spaces;~~ ~~10. TRAN-S11 Surface of parking and loading areas;~~ ~~11. TRAN-S12 On-site cycle parking.~~ Matters of discretion are restricted to: 1. the matters of discretion listed in any of the standards TRAN-S2,~~TRAN-S3, TRAN-S4, TRAN-S5,~~TRAN-S6,~~TRAN-S7, TRAN-S8~~,TRAN-S9, ~~TRAN-S10, TRAN-S11, and/or TRAN-S12~~that are not complied with.
290.286	Philip and Becky Wilson	Transport	TRAN-R4 Vehicle trip generating activities All zones Activity status: Permitted Whe	Support	Supports with changes to reduce the consent threshold and controlling the activity directly by the number of traffic movements rather than using proxies like gross floor area.	Retain as notified with changes to Table 6 - High Trip Generator Thresholds.
290.287	Philip and Becky Wilson	Transport	TRAN-R5 Walkways, cycleways and shared paths which are located on public land other than a roa	Support	Support with amendment to replace the Austroads Guide with a specific standard to ensure oversight of future changes is under WDC control.	Seeks to retain as notified with changes to TRAN-S20.
290.288	Philip and Becky Wilson	Transport	TRAN-R6 Extensions and new vehicle access tracks ancillary to infrastructure, outside of any o	Support	Support with amendment to apply within overlays as extensive coverage of the Rural Scenic and Outstanding Natural Landscapes overlays makes it overly restrictive if excluded and considers infrastructure access should take precedence over overlay values without requiring consent or incurring additional costs.	Seeks to amend as follows: TRAN-R6 Extensions and new vehicle access tracks ancillary to infrastructure, ~~outside of any overlay~~
290.289	Philip and Becky Wilson	Transport	TRAN-S3 Service lanes, private ways, private roads, pedestrian accessways and walkways	Support	Support if restricted to public ways only and specifies a standard rather than requiring purchase of the standard.	Seeks to amend as follows: TRAN-S3 Service lanes, ~~private ways, private roads,~~pedestrian accessways and walkways on public land. 1. Service lanes, private ways, private roads, pedestrian accessways and walkways on public land must be designed and constructed in accordance with[describe standards here] ~~NZS 4404:2010 Land Development and Subdivision Infrastructure; except where Table 7 Minimum legal widths and formation requirements for private ways/vehicle access lots replaces the formation requirements of private ways for residential units detailed in NZS 4404:2010.~~

290.290	Philip and Becky Wilson	Transport	TRAN-S5 Design standards for vehicle manoeuvring areas Areas must be provided on a sit	Oppose	Considers the standard overly restrictive by requiring all vehicle standing, queuing, and manoeuvring to occur entirely within a site, including areas inherently used for such purposes, making on-street parking non-compliant and imposing internal site controls unrelated to TRAN-O1.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. Areas must be provided on a site for vehicles to stand, queue and make all necessary maneuvers on site without using the road or State Highway, ~~and without~~using the area provided for parking space, servicing, loading space or outdoor storage ~~purposes~~; and ...Matters of discretion are restricted to: 1. the safety and movement of pedestrians, cyclists, public transport and general traffic on the road corridor.
290.291	Philip and Becky Wilson	Transport	TRAN-S7 On-site loading spaces for non-residential activities The number of loading sp	Oppose	Considers the standard inappropriate for rural contexts and that it imposes unnecessary discretion over loading needs best determined by the operator. Also considers that it relies on outdated and inaccessible standards and should instead include explicit provisions within the plan.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. The number of loading spaces for any non-residential activity must not be less than that shown in Table 8 – Minimum loading space requirements for non-residential activities below and must be provided on-site, except in the Town Centre Zone and rural zones. ... 3. Neither Clause 1 or 2 above apply to sites of less than 50m2 that are used for infrastructure purposes, or to primary production. Matters of discretion are restricted to: 1. the effective, efficient and safe operation of the transport network; and ~~2. the identified loading needs of the activity.~~
290.292	Philip and Becky Wilson	Transport	TRAN-S8 Design requirements for loading spaces and vehicle standing spaces Loading spa	Oppose	Considers the standard inappropriate for rural conditions and imposes unnecessary discretion over loading needs. Also considers the standard relies on outdated and inaccessible standards, and should instead include clear, explicit provisions within the plan.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. Loading spaces and vehicle standing spaces required under TRAN-S5 must be designed, constructed and maintained in accordance with [produce a specific standard in the text here].~~AS 2890.2.2002 Parking facilities Part 2: Off-street commercial vehicle facilities, for the specified minimum design vehicle.~~ Matters of discretion are restricted to: 1. the effective, efficient and safe operation of the transport network; and ~~2. the identified loading and vehicle space needs of the activity.~~

290.293	Philip and Becky Wilson	Transport	TRAN-S9 Accessible parking spaces Where parking spaces are provided on site: any on-si	Support	Support subject to submission(s) from disability advocate organisations, particularly regarding application to rural zones.	Seeks to retain with any amendments requested by disability advocate organisations and disabled people.
290.294	Philip and Becky Wilson	Transport	TRAN-S10 Design requirements for on-site vehicle parking spaces Where parking spaces ar	Oppose	Considers the standard imposes design requirements that are unclear or unsuitable for rural and residential contexts and regulates internal site effects inconsistent with TRAN-O1.	Seeks to amend as follows: Where parking spaces are provided on a site: 1. car parking must comply with the requirements of [provide standard here]~~AS 2890.1:2004 Parking facilities Part 1: Off-street car parking,~~except for: a. a parking space in a garage or carport; or b. staff parking that is provided as stacked parking of no more than two vehicles, or c. parking for residential or primary production activity. ...
290.295	Philip and Becky Wilson	Transport	TRAN-S11 Surface of parking and loading areas The surface of all parking and loading a	Oppose	Considers the standard imposes unnecessarily low thresholds and surface requirements on parking and loading areas in rural and residential zones, regulates internal site effects inconsistent with TRAN-O1, and conflicts with permitted pathways for multiple residential units.	Seeks to delete or include as advice note. Alternatively, seeks to amend as follows: 1. The surface of ~~all~~ parking and loading areas must either be: ... 2. Clause 1 does not apply where a site contains parking for ~~one~~residential units or primary production activity.
290.296	Philip and Becky Wilson	Transport	TRAN-S12 On-site cycle parking All developments, excluding residential units and prima	Oppose	Considers the standard inappropriately applies cycle parking requirements in rural areas where cycling is impractical and potentially unsafe and is overly prescriptive in its design standards.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. All developments, excluding residential units and primary production, ~~must~~should provide cycle parking at a rate of 1 cycle parking for every 10 car parking spaces provided; and 2. cycle parking ~~must~~should meet the following minimum specifications: a. cycle parking facilities ~~must~~should be: i. signposted or visible to cyclists entering the site; and ~~ii. located as close as possible to, and no more than 15m from at least one main pedestrian public entrance to the building/activity; and~~ iii. located so they do not impede pedestrian thoroughfares, including areas used by people whose mobility or vision is restricted; and iv. clear of vehicle parking or manoeuvring areas; ~~b. cycle parking facilities must be available during the activity's hours of operation and must not be impeded by any structure, storage of goods, landscape planting or other use; and~~ ~~c. long stay cycle parking facilities (for staff or residents) must be located:~~ ~~i. in a covered area; and~~

						~~ii. in an area where access by the general public is generally excluded.~~ ~~Note: Refer to the Austroads Bicycle Parking Facilities: Guidelines for design and installation: October 2-16 (AP-R527-16).~~ Matters of discretion are restricted to: ... 4. whether cycling is a safe method of transport to the site.
290.297	Philip and Becky Wilson	Transport	TRAN-S13 Width and number of vehicle crossings onto roads Every lot with direct vehicl	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
290.298	Philip and Becky Wilson	Transport	TRAN-S14 Formation and sealing of vehicle crossings All vehicle crossings onto a seale	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
290.299	Philip and Becky Wilson	Transport	TRAN-S15 Distance between vehicle crossings and road intersections the distance betwee	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice
290.300	Philip and Becky Wilson	Transport	TRAN-S16 Sight distances from vehicle crossings Any vehicle crossing onto a road other	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
290.301	Philip and Becky Wilson	Transport	Table 6 – High trip generator thresholds	Support	Supports the thresholds with modification to raise the lower limits, as considers there is no technical evidence supporting the current thresholds and managing effects through vehicle movements is more appropriate. Also considers that valuable services such as emergency, healthcare, education, recreation, and community facilities should be given higher permitted thresholds to reduce consent barriers and better reflect their social importance.	Seeks to incorporate management of the effects from publicly owned or funded educational facilities managed by TRAN-R8 when a road needs upgraded to meet effects from an exceeded threshold. [refer to original submission for full relief sought]
290.302	Philip and Becky Wilson	Transport	Table 7 – Minimum legal widths and formation requirements for private ways/access lots	Oppose	Considers the table unnecessarily duplicates TRAN-S2 by applying minimum legal widths and formation requirements to private ways, manages only internal site effects, and relies on inaccessible standards without supporting technical evidence.	Seeks to amend as follows: Table 7 – Minimum legal widths and formation requirements for ~~private ways/~~access lots
290.303	Philip and Becky Wilson	Energy	General	Oppose	Considers that the chapter does not adequately reflect the benefits and low environmental impact of renewable energy and places excessive consent burdens on activities that should be encouraged, especially those generating electricity at the point of consumption to reduce demand on large-scale infrastructure.	Seeks for the chapter to reflect the benefits and low environmental impact of renewable energy and to reduce consent burdens on these activities [inferred relief requested].
290.304	Philip and Becky Wilson	Energy	ENG-O1 Recognising the benefits of renewable electricity generation The significant local,	Support	No specific reasons given	Retain as notified

290.305	Philip and Becky Wilson	Energy	ENG-O2 Design and location of renewable electricity generation Renewable electricity ge	Support	No specific reasons given	Retain as notified
290.306	Philip and Becky Wilson	Energy	ENG-O3 Protecting the values and qualities of any overlay Waitaki District's overlays a	Oppose	Considers that not all overlays are equal and not all renewable energy methods are equal.	Seeks to amend as follows: ENG-O3 Protecting the values and qualities of ~~any~~overlay Waitaki District's overlays are protected as far as practicable from ~~the~~ any significant adverse effects of renewable electricity generation activities.
290.307	Philip and Becky Wilson	Energy	ENG-P1 Recognising the benefits of renewable electricity generation Recognise the local, r	Support	No specific reasons given	Retain as notified
290.308	Philip and Becky Wilson	Energy	ENG-P2 Existing activities Enable the ongoing refurbishment, maintenance and repair, an	Support	No specific reasons given	Retain as notified
290.309	Philip and Becky Wilson	Energy	ENG-P3 Effects on renewable electricity generation activities Only allow new sensitive act	Support	No specific reasons given	Retain as notified
290.310	Philip and Becky Wilson	Energy	ENG-P4 Small scale renewable electricity generation activities and investigation activities ou	Support	Supports with amendments to also enable small scale renewable electricity generation activities within overlays, particularly extensive overlays such as ONL and RSL where entire properties are affected. Considers energy-related overlays (e.g., National Grid yard, Waitaki Power Scheme) should not restrict renewable energy generation and that natural hazard overlays aregenerally irrelevantto renewable energy effects beyond structural limitations. Considers small-scale renewable energy generation should be enabled across all overlays, with large-scale activities controlled only within identified overlays. Also considers that the PDP should "recognise and provide for" small-scale renewable electricity generation to align with the NPS-REG.	Seeks to amend as follows: ENG-P4 Small scale renewable electricity generation activities and investigation activities ~~outside of overlays~~ ~~Enable~~ Recognise and provide for small scale renewable electricity generation activities and activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation activities, ~~where:~~ ~~1. it is of a form, location and scale that minimises adverse effects on the environment; and~~ ~~2. it is consistent with the anticipated amenity values and character of the zone; and~~ ~~3. where it is demonstrated that all adverse effects on an overlay cannot be avoided, it appropriately offsets or compensates the adverse effects.~~
290.311	Philip and Becky Wilson	Energy	ENG-P5 Small scale renewable electricity generation activities and investigation activities in	Oppose	Considers that small-scale renewable energy generation should be provided for under the NPS-REG as its effects are minor and existing overlay chapters already manage structural impacts. Considers that discouraging such activities may lead to greater reliance on large-scale projects with more significant effects.	Seeks to delete the policy. Alternatively, seeks to amend as follows: ~~Only allow~~ Recognise and provide for small scale renewable electricity generation activities and activities associated with the investigation, identification and assessment of potential sites and

						energy sources for renewable electricity generation activities within an overlay where: 1. if located on buildings, items and sites identified in SCHED2 – Historic Heritage Items, SCHED3 – Character Contributing Buildings and non-contributing buildings where the building is a character contributing building, and SCHED5 – Sites and Areas of Significance to Māori: a. its location is sympathetic to the identified values where practicable; and ~~b. any structure is not visible from any adjoining public place and~~where practicable, is aligned with the plane of the roof where located on a roof; 2. if located within the root protection area of a tree identified in SCHED4 - Notable Trees, the work will not likely compromise the long-term health, natural life or values of the Notable Tree; ... ~~5. it is demonstrated that all adverse effects on the values of the relevant overlay cannot be avoided, it appropriately offsets or compensates the adverse effects.~~
290.312	Philip and Becky Wilson	Energy	ENG-P6 Large scale renewable electricity generation activities Provide for large scale	Support	Considers that large scale activities have more significant effects and it is appropriate to manage them.	Retain as notified
290.313	Philip and Becky Wilson	Energy	ENG-P7 Large scale renewable electricity generation activities in other zones and within overl	Support	Considers that large scale activities have more significant effects and it is appropriate to manage them.	Retain as notified
290.314	Philip and Becky Wilson	Energy	ENG-P8 New technology Recognise the opportunity for new technology in renewable electri	Support	No specific reasons given	Retain as notified
290.315	Philip and Becky Wilson	Energy	ENG-P9 Decommissioning of renewable electricity generation activities Require that, during	Support	No specific reasons given	Retain as notified
290.316	Philip and Becky Wilson	Energy	ENG-R1 The operation, maintenance, and refurbishment of existing renewable electricity generat	Support	No specific reasons given	Retain as notified
290.317	Philip and Becky Wilson	Energy	ENG-R2 The operation, maintenance, and refurbishment of existing renewable electricity generat	Support	No specific reasons given	Retain as notified
290.318	Philip and Becky Wilson	Energy	ENG-R3 Small scale renewable electricity generation activities outside of an overlay Al	Support	Support but considers it should also apply within overlays subject to the provisions of the relevant chapter in that overlay.	Seeks to amend as follows: ENG-R3 Small scale renewable electricity generation activities ~~outside of an overlay~~

290.319	Philip and Becky Wilson	Energy	ENG-R4 Investigation activities outside of an overlay All zones Activity status: Perm	Support	No specific reasons given	Retain as notified
290.320	Philip and Becky Wilson	Energy	ENG-R5 Small scale renewable electricity generation activities and investigation activities in	Oppose	Considers small-scale renewable generation should be permitted activities as they are low impact and a restricted discretionary status adds disproportionate costs that discourage such activities and conflict with the NPS-REG.	Seeks to delete the rule and manage with ENG-R3. Alternatively, seeks to amend to a controlled activity [refer to original submission for full relief sought]
290.321	Philip and Becky Wilson	Energy	ENG-R6 Small scale renewable electricity generation activities and investigation activities wi	Support	No specific reasons given	Retain as notified
290.322	Philip and Becky Wilson	Energy	ENG-R7 Large scale renewable electricity generation activities General Rural Zone Act	Oppose	Considers that renewable energy as a non-complying activity across overlays contradicts the NPS-REG, especially where overlays are intended for energy generation, and given that adverse effects are already managed by other chapters, the activity should be (restricted) discretionary.	Seeks to amend as follows: Activity status: Restricted Discretionary [refer to original submission for full relief sought]
290.323	Philip and Becky Wilson	Energy	ENG-R8 Other renewable electricity generation activities not otherwise provided for All	Oppose	Considers the rule is unclear in scope and appears to pre-emptively control assumed future effects without justification, and this will discourage innovation and renewable energy generation contrary to the NPS-REG. Considers any necessary controls should be addressed in relevant chapters only when actual effects are known.	SeekstodeleteENG-R8 and manage the effects within the relevant zone or overlay chapter.
290.324	Philip and Becky Wilson	Energy	ENG-S1 Small scale solar panels All zones The panel must not exceed the permitted bu	Support	No specific reasons given	Retain as notified
290.325	Philip and Becky Wilson	Energy	ENG-S2 Small scale roof mounted wind turbines All zones The turbine (including the f	Support	No specific reasons given	Retain as notified
290.326	Philip and Becky Wilson	Energy	ENG-S3 Small scale freestanding wind turbines General Rural Zone Special Purpose Zo	Support	No specific reasons given	Retain as notified
290.327	Philip and Becky Wilson	Energy	ENG-S4 Small scale hydro generators General Rural Zone Rural Lifestyle Zone Industr	Support	Supports with amendments as the 200m^2 limit is too restrictive for stored water and the dam height is better regulated under the Dam Safety Regulations 2022. Considers the matters of discretion vague, such as 'suitability of the site' and lack clarity and justification, especially when many dams relate to existing water bodies or irrigation systems.	Seeks to amend as follows: 1. The maximum surface area of any stored water solely for hydro electricity does not exceed 200m2; and 2. the maximum height of a weir or dam solely for hydro electricity does not exceed 2m; and 3. the maximum installed capacity does not exceed 4 megawatts (MW).

						Matters of discretion are restricted to: ... ~~3. the suitability of the site for the proposed activity; and~~ ...
290.328	Philip and Becky Wilson	Earthworks	EW(Q)-S2 Setback from a site boundary General Rural Zone Special Purpose Zone – Macra	Support	Supports the setback standard for farm quarries but considers the required distance from neighboring properties should be reduced as considers it is excessive and limits quarry location options. Further notes that the remaining land is less suitable due to high groundwater and being in the middle of paddocks.	Seeks to amend setback to 20m consistent with the set back from waterways. Seeks to amend as follows: 1.<u>New</u> Farm quarries and <u>new</u> restricted use quarries must not be located within ~~100m~~<u>20m</u> of <u>a residential activity on</u> an adjoining site under different ownership from that of the land on which the farm quarry or restricted use quarry is located. 2. On sites adjoining a Residential or Settlement Zone boundary, the setback shall be at least 300m from the boundary <u>for any new quarry, including restricted use quarry and farm quarry.</u>
290.329	Philip and Becky Wilson	NOIC – North Otago Irrigation Company Limited	North Otago Irrigation Scheme Designation Unique Identifier NOIC-1 Designation P	Support	No specific reasons given	Retain as notified
290.330	Philip and Becky Wilson	SCHED9 – Schedule of Significant Natural Features	Ref. Significant Natural Feature Description Values and Characteristics	Support	Support for SNF24 as it is well mapped to the cliff feature and avoids improved pasture. [refer to original submission for full reasons]	Retain as notified
291.1	Peter and Janine Stackhouse	Strategic Direction	General	Support	In general support of Strategic Direction chapter, in particular the historical and cultural identity and values, and the rural areas. [Refer to original submission for full reasons]	Retain as notified
291.2	Peter and Janine Stackhouse	Definitions	Agricultural intensification in relation to the Ecosystems and Indigenous Biodiversity c	Oppose	[Refer to original submission for full reasons]	[Refer to original submission for full relief sought] Seeks to add a new definition as follows: ~~Agricultural intensification:~~ <u>High rate irrigation:</u> in relation to the ~~Ecosystems and Indigenous Biodiversity chapter, Natural Features and Landscapes chapter, and the~~Sites and Areas of Significance to Māori chapter where rock art is identified, means change from non-irrigated primary production (including plantation forestry) to ~~irrigated~~agricultural production <u>that is irrigated to a depth more than 10mm, or not controlled by a Freshwater Farm Plan</u> on land that is not currently irrigated <u>as of 1st March 2025</u>. ~~It also includes anychange from irrigated crop and seed production to dairy farming.~~
291.3	Peter and Janine Stackhouse	Definitions	Commercial activity NPS means any activity trading in goods, equipment or services. It	Oppose	Considers the definition captures not-for-profit and charity trading unlikely to be of a scale to cause significant adverse effects.	Seeks to amend as follows: Commercial activities: means any activity trading in goods, equipment or services <u>for profit....</u>

291.4	Peter and Janine Stackhouse	Definitions	Farm building means a building used for the exercise of farming activities and excludes:	Oppose	Considers the term 'primary production activities' should be used consistently in the PDP.	Seeks to amend as follows: means a building used for the exercise of ~~farming~~ primary production activities and excludes:
291.5	Peter and Janine Stackhouse	Definitions	Farm track An un-sealed private track serving permitted agricultural or forestry activit	Oppose	Considers that the definition of farm track should also include those serving consented activities and that sealed farm tracks offer environmental benefits such as reducing sediment loss and controlling dust. Considers that the term 'primary production activity should be used as there is no definition for 'agricultural' activity.	Seeks to amend as follows: An un-sealed or sealed private track serving ~~permitted agricultural or forestry~~primary production activities.
291.6	Peter and Janine Stackhouse	Definitions	Hazardous facility means a facility or activity that involves the use, storage or dispos	Oppose	No specific reason given.	Seeks to retain as notified
291.7	Peter and Janine Stackhouse	Definitions	Heritage professional means a person with a degree or recognised post-graduate qualifica	Amend	Considers the phrase 'recognised postgraduate qualification' too vague, as it doesn't specify who recognises it or how.	Seeks to amend as follows: means a person with a degree or ~~recognised~~ post-graduate qualification in a field related to heritage conservation or management..
291.8	Peter and Janine Stackhouse	Definitions	Identified taoka has the same meaning as in the National Policy Statement on Indigenous	Oppose	Considers that there should be a schedule or list of acknowledged or identified taoka as the PDP's use of the term 'taoka' is ambiguous, making it unclear whether references are to identified or acknowledged taoka.	Seeks to add a schedule of identified taoka and acknowledged taoka into the PDP. Remove provisions for taoka until a list is provided and provisions can be submitted on.
291.9	Peter and Janine Stackhouse	Definitions	Intensive outdoor primary production means primary production activities involving the	Oppose	Considers that the definition is vague and open to subjective interpretation and that the terms 'regular' and 'substantially provided other than from the site concerned' should be defined.	Seeks to amend as follows: Intensive outdoor primary production means primary production activities involving the keeping or rearing of livestock, or commercial aquaculture, where the ~~regular~~majority feed source for the production of goods is ~~substantially~~provided other than from the site concerned... It excludes the following: ... e. Primary production activities when a drought is declared
291.10	Peter and Janine Stackhouse	Definitions	Pervious surface means any part of a site which is grassed or planted in trees or shrubs	Oppose	Considers that other surfaces may be pervious such as stones or other types of garden.	Seeks to amend as follows: Pervious surface means any part of a site which ~~is grassed or planted in trees or shrubs and~~is capable of absorbing water including soft landscaping, grass and planted trees or shrubs.. It does not include impervious surfaces or any area which: ...

291.11	Peter and Janine Stackhouse	Definitions	Potentially high-impact industrial activities means industrial activities that because o	Oppose	Considers the definition to be broad, unintentionally including hunting, home kill, and septic tanks, which are low-impact and may duplicate regional consent requirements. Additional consent burdens may discourage the development of quality housing and affordable food production.	Seeks to amend as follows: ... 2.commercial and non-pest species meat processing, or ~~any~~associated processing of meat and meat by-products, or co-products; ... 10. storage and disposal of sewage, septic tank sludge, or refuse other than at the source;
291.12	Peter and Janine Stackhouse	Definitions	Recreational activity means the use of land and/or buildings for the purpose of active o	Oppose	Considers that the definition is circular as it uses 'recreation' within the definition itself.	Seeks to amend as follows: Recreational activity: means the use of land and/or buildings for the purpose of active or passive enjoyment of organised sports, ~~recreation~~or entertainment. Excludes any recreational activity within the meaning of residential activity.
291.13	Peter and Janine Stackhouse	Definitions	Regionally significant infrastructure is: strategic land transport network and arterial	Support	No specific reasons given	Retain as notified
291.14	Peter and Janine Stackhouse	Definitions	Repair workshop means the mechanical repair and servicing of motor vehicles (includes mo	Oppose	Considers that if the definition was applied outside of the Local Centre Zone, it could include farm and residential workshops.	Retain as notified - but only in the LCZ. If used in other zones, seeks to amend as follows: Repair workshop means the commercial mechanical repair and servicing of motor vehicles (includes motorcycles, caravans, boat motors, trailers) inside a building.
291.15	Peter and Janine Stackhouse	Definitions	Sensitive environment area of land contained within any of the following areas: Coa	Oppose	Considers that the district plan has no jurisdiction on airspace and that the correct term for the height of land above sea level is 'elevation'.	Seeks to delete clause (11) or amend as follows: 11. Above 900 metres in ~~altitude~~ elevation
291.16	Peter and Janine Stackhouse	Definitions	Riparian margin means: for land in the General Rural Zone, all landward property adjo	Oppose	Considers the definition is inconsistent with other measures under the RMA which manage similar sediment issues such as the regulations controlling intensive winter grazing which have a 5m buffer.	Seeks to amend as follows: 1. ~~for land in the General Rural Zone~~, all landward property adjoining and within ~~20~~5 metres of the boundary of the bed of a river or lake, or of the edge of a wetland; ~~and~~ ~~2. for land outside the General Rural Zone, all landward property adjoining and within 10 metres of the boundary of the bed of a river or lake, or of the edge of a wetland.~~
291.17	Peter and Janine Stackhouse	Definitions	Temporary activity means activities and their ancillary buildings and structures that ar	Support	Supports the definition but considers that the undefined term 'helicopter' could be interpreted too broadly and include anything from a drone, gyrocopter through to high impact military helicopters which require support services. Considers that the	Seeks to amend clause (6) as follows: 6. temporary ~~helicopter~~ aircraft take-offs and landings; and

					term 'aircraft' is appropriate to use as it encompasses helicopters, drones, gyrocopters, and fixed-wing aircraft.	
291.18	Peter and Janine Stackhouse	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Considers that the term 'chemical' [clause (6)] is too broad and could include harmless substances like water or atmospheric gases and that requiring proof of a change to the hydrological balance is impractical, as baseline data is not generally available. Considers that many of the listed effects may occur accidentally or naturally, and the wording should allow for such occurrences. Considers it ambiguous whether cushionfield[clause (8)] is the competitor or the outcompeted species referred to. Also considers the reference to mob-stocking [clause (10)] is unclear and potentially contradictory, as grazing is excluded from the definition and is often beneficial to ecosystems - suggests using the term 'pugging' as an alternative. Considers that the term 'established farming practice' lacks a clear method or explanation for how it is determined. Considers that restrictions on indigenous vegetation removal may disincentivise new plantings and will be more expensive to establish than exotic species (which also offer better returns under the Emissions Trading Scheme) and would also limit access to non-threatened indigenous species like manuka, which are valuable for low-cost home heating.	Seeks to amend as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation established as at1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate: 1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of ~~chemicals~~harmful substances including herbicide; 7. burning; 8.~~the deliberate~~application of water, fertiliser or oversowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion, ~~including dryland cushionfield species;~~ 9.~~the~~drainage of mapped wetlands or lakes; ~~10. mob-stocking; and~~ 11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site;~~ b. walking; c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood
291.19	Peter and Janine Stackhouse	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried (not mined). Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	Seeks to amend as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones~~, and a prescribed substance within the meaning of the Atomic Energy Act 1945
291.20	Peter and Janine Stackhouse	Mana whenua	General	Support	Support in part [Refer to original submission for full reasons]	Seeks to retain as notified
291.21	Peter and Janine Stackhouse	Mana whenua	Consultation with mana whenua	Support	Supports in part. Support is expressed for clearly identifying when mana whenua may be affected by a proposal. Considers that where iwi consultation is encouraged, costs should be	Seeks to remove reference to applicants being charged fees for consultation and for a memorandum of understanding to be consulted on prior to further submissions.

					recoverable and that for matters of national importance (including mana whenua, historic heritage, natural features, ecosystems, and natural hazard), costs should be publicly funded, not charged to individual applicants. Considers that specifying applicant fees is outside the scope of the PDP and that consultation processes should be guided by memorandums of understanding or similar, as recommended in the SASM Section 32 report.	
291.22	Peter and Janine Stackhouse	Natural Hazards	NH-O1 Natural hazard risk The risks from natural hazards, including the effects of climate	Support	Supports with modifications to include proportionality of the avoidance and mitigation to the level of risk.	Seeks to amend as follows: The impact on people, property and the environment from the risks of natural hazards and the effects of climate change are recognised, avoided or mitigated relative to the level of risk.
291.23	Peter and Janine Stackhouse	Natural Hazards	NH-P1 Identification of natural hazard areas As information becomes available, identify an	Support	Support in part with modification to better focus the policy.	Seeks to amend as follows: As information becomes available, identify and map land that ~~may~~is known to be subject to natural hazards, including taking into account the effects of climate change.
291.24	Peter and Janine Stackhouse	Natural Hazards	NH-P2 Risk based approach Avoid subdivision, use and development in areas where natural	Support	No specific reasons given	Retain as notified
291.25	Peter and Janine Stackhouse	Natural Hazards	NH-P3 Critical facilities and regionally significant infrastructure Avoid locating critica	Support	No specific reasons given	Retain as notified
291.26	Peter and Janine Stackhouse	Natural Hazards	NH-P4 Natural protection features Encourage the use, protection, maintenance and enhanc	Support	Support with recommendation to expand scope to explicitly require engineering solutions where natural protection features are unsuitable, particularly in cases involving the protection of infrastructure, people, and property, where more reliable methods may be necessary.	Seeks to amend as follows: Encourage the use, protection, maintenance and enhancement of natural features, buffers and systems, such as wetlands and vegetation, which provide protection from natural hazard risk where engineering solutions are not required to mitigate risk to people, property and infrastructure.
291.27	Peter and Janine Stackhouse	Natural Hazards	NH-P13 Other natural hazard awareness overlays Encourage proposals for subdivision, use an	Support	Supports in part but considers an assessment should not be required in all cases, especially when there's no evidence that a specific use is at risk from an awareness overlay. Considers there is no clear definition of what constitutes an 'acceptable level' of risk and who deter mines it.	Seeks to amend as follows: Encourage proposals for subdivision, ~~use~~and development in a natural hazard awareness overlay to undertake an assessment of natural hazard risk and incorporate any methods to reduce or mitigate the risk. ~~to an acceptable level.~~ Alternatively, if 'use' is to remain, seeks to amend as follows: Encourage proposals for subdivision, use and development in a natural hazard awareness overlay to ~~undertake an assessment~~ consider the effects of natural hazard risk and incorporate methods to reduce or mitigate the risk ~~to anacceptable level.~~

291.28	Peter and Janine Stackhouse	Natural Hazards	NH-R1 Buildings, structures and fences in the Otago Flood Assessment Overlay All zones	Oppose	Considers the definition should acknowledge that other farm structures, like poles or irrigation infrastructure, are not more flood-prone or hazardous than those already listed and may even mitigate risk. Considers the term 'suitably qualified and experienced professional' should be clarified.	Seeks to amend as follows: PER-1 The building or structure is: ... 3. an unenclosed building without a floor or with a concrete floor; or ... 6. a pole; or 7. irrigation or stock water infrastructure Seeks clarification on the term 'suitably qualified and experienced professional'
291.29	Peter and Janine Stackhouse	Natural Hazards	NH-R2 Buildings, structures and fences in the Canterbury Flood Assessment Overlay All z	Oppose	Considers the definition should acknowledge that other farm structures, like poles or irrigation infrastructure, are not more flood-prone or hazardous than those already listed and may even mitigate risk.	Seeks to add provision for other floors in buildings and structures like poles and water infrastructure.
291.30	Peter and Janine Stackhouse	Natural Hazards	NH-R4 Earthworks excluding land disturbance in all Flood Assessment Overlays All zones	Support	Supports with recommendation to permit the building of tracks.	Seeks to amend as follows: PER-3 The earthworks are for the construction of a farm track.
291.31	Peter and Janine Stackhouse	Natural Hazards	NH-R6 Land use activities in the Canterbury Flood Assessment Overlay, the Otago Flood Assessme	Support	Supports with recommendation to add other uses which are compatible with the objectives and policies of the Natural Hazards chapter such as airstrips and helicopter take-off and landing areas.	Seeks to amend as follows: 5. Aeroplane airstrips and helicopter take-off and landing areas.
291.32	Peter and Janine Stackhouse	Natural Hazards	NH-P5 Site specific assessment/investigation A risk assessment will be required for subdiv	Support	No specific reasons given	Retain as notified
291.33	Peter and Janine Stackhouse	Natural Hazards	NH-P6 Canterbury Flood Assessment Overlay Except as provided for in NH-P3, avoid subdiv	Support	No specific reasons given	Retain as notified
291.34	Peter and Janine Stackhouse	Natural Hazards	NH-P7 Otago Flood Assessment Overlay and Waitaki River Floodplain Assessment Overlay Ex	Support	No specific reasons given	Retain as notified
291.35	Peter and Janine Stackhouse	Natural Hazards	NH-P11 Liquefaction Assessment Overlay Provide for subdivision in the Liquefaction Assessm	Support	No specific reasons given	Retain as notified

291.36	Peter and Janine Stackhouse	Natural Hazards	NH-P12 Wildfire – subdivision and land use Ensure that subdivision and land use in area	Support	No specific reasons given	Retain as notified
291.37	Peter and Janine Stackhouse	Natural Hazards	NH-R3 Buildings, structures and fences in the Waitaki River Floodplain Assessment Overlay	Oppose	Considers the definition should acknowledge that other farm structures, like poles or irrigation infrastructure, are not more flood-prone or hazardous than those already listed and may even mitigate risk.	Seeks to add provision for other floors in buildings and structures like poles and water infrastructure.
291.38	Peter and Janine Stackhouse	Natural Hazards	NH-R13 Wildfire – woodlots, shelterbelts, plantation forestry and buildings All zones	Amend	Supports with modification to encourage the planting of low flammability plants, particularly near houses.	Seeks to amend as follows: PER-4 The woodlot, shelterbelt or plantation forestry is a species listed in the FENZ Low Flammability Plant Directory.
291.39	Peter and Janine Stackhouse	Hazardous Substances	General	Support	Support for chapter and definition	Retain as notified
291.40	Peter and Janine Stackhouse	Historic Heritage	HH-O1 Protection of historic heritage The District's historic heritage is recognised, main	Support	No specific reasons given	Retain as notified
291.41	Peter and Janine Stackhouse	Historic Heritage	HH-O2 Use and adaptive re-use of historic heritage Historic Heritage Items and their herit	Support	Supports noting that primary production is sympathetic re-use of the heritage settings where existing.	Retain as notified
291.42	Peter and Janine Stackhouse	Historic Heritage	HH-P1 Recognise historic heritage Identify Historic Heritage Items and their associated	Support	Support with recommendation to recognise landowners' interests and consent in heritage protection. Considers heritage protection to be more effective when landowners are constructively engaged and permission is required for listing.	Seeks to amend as follows: With landowner permission, identify Historic Heritage Items and their associated heritage settings throughout the Waitaki district that warrant protection in SCHED2 – Historic Heritage Items, and are significant in terms of one or more of the following values:...
291.43	Peter and Janine Stackhouse	Historic Heritage	HH-P2 Historic heritage scheduling Classify Historic Heritage Items and their associate	Support	No specific reasons given	Retain as notified
291.44	Peter and Janine Stackhouse	Historic Heritage	HH-P3 Benefits of active use, adaptive re-use, and protection of historic heritage Recogni	Support	Support in the context of re-use being primary production.	Retain as notified
291.45	Peter and Janine Stackhouse	Historic Heritage	HH-P4 Heritage maintenance Enable the use and heritage maintenance of the Historic Heri	Support	Support in the context of re-use being primary production.	Retain as notified

291.46	Peter and Janine Stackhouse	Historic Heritage	HH-P5 Modern service attachments Enable attachments to Historic Heritage Items included	Support	No specific reasons given	Retain as notified
291.47	Peter and Janine Stackhouse	Historic Heritage	HH-P6 Heritage restoration Control the heritage restoration of Historic Heritage Items	Support	No specific reasons given	Retain as notified
291.48	Peter and Janine Stackhouse	Historic Heritage	HH-P7 Retaining historic heritage – earthquake and flooding resiliency Encourage earthquak	Support	No specific reasons given	Retain as notified
291.49	Peter and Janine Stackhouse	Historic Heritage	HH-P8 Protecting historic heritage from inappropriate heritage alterations Provide for	Support	No specific reasons given	Retain as notified
291.50	Peter and Janine Stackhouse	Historic Heritage	HH-P9 Relocation of Historic Heritage Items within or beyond their heritage setting Allow	Support	No specific reasons given	Retain as notified
291.51	Peter and Janine Stackhouse	Historic Heritage	HH-P10 Demolition or destruction of Category B Historic Heritage Items Only allow the d	Support	No specific reasons given	Retain as notified
291.52	Peter and Janine Stackhouse	Historic Heritage	HH-P11 Demolition or destruction of Category A Historic Heritage Items Avoid the demolitio	Support	No specific reasons given	Retain as notified
291.53	Peter and Janine Stackhouse	Historic Heritage	HH-P12 Buildings and structures within heritage settings Only allow new buildings and s	Support	No specific reasons given	Retain as notified
291.54	Peter and Janine Stackhouse	Historic Heritage	HH-P13 Subdivision of sites containing Historic Heritage Items Only allow subdivision o	Support	No specific reasons given	Retain as notified
291.55	Peter and Janine Stackhouse	Historic Heritage	HH-P14 Planning incentives to encourage the sustainable use of Historic Heritage Items Ass	Support	No specific reasons given	Retain as notified
291.56	Peter and Janine Stackhouse	Historic Heritage	HH-P15 Future consideration of historic heritage Council continues to investigate the iden	Oppose	Considers this to be a council matter, not a planning matter as future councils may have different priorities and should not be bound by past policies or required to undertake a plan change between cycles.	Seeks to delete the policy.

291.57	Peter and Janine Stackhouse	Historic Heritage	HH-R1 Heritage maintenance on Historic Heritage Items listed in SCHED2 – Historic Heritage Ite	Support	No specific reasons given	Retain as notified
291.58	Peter and Janine Stackhouse	Historic Heritage	HH-R2 Animal grazing on sites and their heritage setting identified in SCHED2 – Historic Herit	Support	Supports in the context of a working farm.	Retain as notified
291.59	Peter and Janine Stackhouse	Historic Heritage	HH-R3 Earthworks within the heritage setting of a Historic Heritage Item listed in SCHED2 – Hi	Support	Supports in the context of a working farm.	Retain as notified
291.60	Peter and Janine Stackhouse	Historic Heritage	HH-R5 New buildings, structures and signs, or alterations to an existing building or structure	Support	Support with suggested modifications to reflect the practical needs of heritage items located in a rural context where structures like fences and pipes are necessary for primary production.	Seeks to amend as follows: PER 1 Any new building, structure or sign is: … 5. is a post and wire or post and rail fence; or 6. is irrigation or stock water infrastructure; or
291.61	Peter and Janine Stackhouse	Historic Heritage	HH-R12 Relocation of a Category B Historic Heritage Item listed in SCHED2 – Historic Heritage	Support	No specific reason given	Retain as notified
291.62	Peter and Janine Stackhouse	Historic Heritage	HH-R13 Relocation of a Category A Historic Heritage Item listed in SCHED2 – Historic Heritage	Oppose	Considers that the relocation of heritage items can sometimes improve their condition or address health and safety risks (for example the Herbert War Memorial) and that making consent too difficult may increase the risk of demolition by neglect.	Seeks to amend HH-R13 to a discretionary activity.
291.63	Peter and Janine Stackhouse	Historic Heritage	HH-R14 Any demolition of a Historic Heritage Item listed in SCHED2 – Historic Heritage Items	Oppose	Considers this to be a council matter, not a planning matter as future councils may have different priorities and should not be bound by past policies or required to undertake a plan change between cycles.	Seeks to delete HH-M1
291.64	Peter and Janine Stackhouse	Historic Heritage	HH-R14 Any demolition of a Historic Heritage Item listed in SCHED2 – Historic Heritage Items	Support	Supports the intent but considers this to be a council matter rather than a planning matter.	Seeks to delete HH-M4
291.65	Peter and Janine Stackhouse	Notable Trees	General	Support	Support for the chapter	Retain as notified
291.66	Peter and Janine Stackhouse	Notable Trees	TREE-P5 Other trimming and pruning of Notable Trees Provide for any other trimming of N	Support	Support with modifications as not possible to confirm long-term impacts of trimming on tree health or lifespan in advance. Considers 'likelihood' is a more practical measure than certainty. Also considers that trimming may alter a tree's natural form, especially when removing diseased or hazardous limbs and that	Seeks to amend as follows:

					TREE-S1 should also be considered regarding the retention of natural form.	Provide for any other trimming of Notable Trees where it can be demonstrated that the works do not: 1.likely compromise the long-term health of the Notable Tree; 2. compromise the identified values of the Notable Tree, listed in SCHED4 - Notable Trees; 3.likely reduce the natural life of the Notable Tree; 4. increase the risk of the Notable Tree being subject to wind damage; and 5. impact the natural shape and form of the Notable Tree more than necessary.
291.67	Peter and Janine Stackhouse	Notable Trees	TREE-S1 Trimming of Notable Trees All zones The maximum branch diameter being trimm	Support	No specific reason given	Retain as notified
291.68	Peter and Janine Stackhouse	Notable Trees	TREE-S2 Trimming or removal of Notable Trees posing a threat to people or property All	Support	No specific reason given	Retain as notified
291.69	Peter and Janine Stackhouse	Notable Trees	TREE-S3 Trimming or removal of Notable Trees All zones The works are undertaken or	Support	No specific reason given	Retain as notified
291.70	Peter and Janine Stackhouse	Notable Trees	TREE-R1 Maintenance of the ground within the root protection area of a Notable Tree All	Support	No specific reason given	Retain as notified
291.71	Peter and Janine Stackhouse	Notable Trees	TREE-R2 Trimming or pruning of a Notable Tree All zones Activity status: Permitted	Support	No specific reason given	Retain as notified
291.72	Peter and Janine Stackhouse	Notable Trees	TREE-R3 Removal of a Notable Tree All zones Activity status: Permitted Where: PER-1	Support	No specific reason given	Retain as notified
291.73	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	General	Support	[refer to original submission for full reasons]	[Refer to original submission for relief sought]
291.74	Peter and Janine Stackhouse	SCHED5 – Schedule of Sites and Areas of Significance to Maori	ID ref Name Description and Values SASM007 Waitaki River The nam	Oppose	Oppose in part Schedule 5. The property is encumbered with the following SASM overlays: SASM013 [refer to original submission for full reasons]	[Refer to original submission for relief sought]
291.75	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	General	Oppose	Considers that Freshwater Farm Plans are set to become the primary planning tool for farmland and aim to streamline consent processes by managing farming effects within a single plan under the RMA, and these may also incorporate SASM values. Considers that Freshwater Farm Plans retain a level playing field because the landowner is obligated to have it certified to carry out activities,	Seeks to reduce consent burdens on farmers and allow them to plan directly with iwi in good faith through Freshwater Farm Plans.

					while the iwi are obligated to consult with the landowner to advise on protection of their significant sites. Both obligations require good faith and genuine relationships rather than expensive consent burdens involving the district council.	
291.76	Peter and Janine Stackhouse	Mana whenua	General	Oppose	Considers there to be a conflict of interest as the plan states that Aukaha helped draft the provisions and will also charge for consultation on them. Considers there needs to be a clear separation between plan-making and implementation.	Seeks that farms with a certified Freshwater Farm Plan (FWFP) include a chapter on SASM management, allowing for permitted activity status. Alternatively, consultation could be provided by a Suitably Qualified Person (SQP) with relevant qualifications and experience, promoting a competitive market and reducing workload for iwi.
291.77	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	General	Oppose	Considers the uncertainty of time and cost associated with consenting, particularly under the SASM provisions should be supported by a service level agreement. Considers that some issues are better addressed through RMA reform and that many Significant Natural Areas and Natural Features and Landscapes appear to have been mapped without proper landowner engagement.	Seeks for the withdrawal of the Sites and Areas of Significance to Māori, Natural Features and Landscapes, Natural Character and Ecosystems and Biodiversity Chapters until the RMA reform is complete and an MOU is in place with Aukaha detailing time and cost of consultation.
291.78	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-O1 Rakatirataka and kaitiakitaka The rakatirataka of mana whenua over their signif	Amend	Supports the intent with modification to clarify that the objective is not intended to be in isolation from the landowner. Considers that that the exercise of kaitiakitaka can't be implemented without agreement from the landowners who have their own rights and responsibilities within their own relationship with the land.	Seeks to amend as follows: The rakatirataka of mana whenua over their significant sites and areas is recognised and they are able to exercise kaitiakitaka within these areas with agreement from the landowners.
291.79	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-O2 Protection of wāhi tūpuna values The relationship of mana whenua with wāhi tūpuna	Support	Support for the objective particularly the goal of increasing community awareness of wāhi tūpuna values. Considers that landowners have historically maintained relationships with these sites without needing district plan provisions and that regulation is not necessary to sustain mana whenua connections.	Seeks that the values for protection need to be identified in the PDP.
291.80	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-O3 Preservation of tuhituhi neherā The integrity of tuhituhi neherā sites is prese	Support	No specific reasons given	Retain as notified
291.81	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-O4 Enhancement of mahika kai Mahika kai values are enhanced to support customary use.	Support	Support with modification to recognise that mahika kai values are maintained and where appropriate these values enhanced, as it may not always be possible to enhance.	seeks to amend as follows: Mahika kai values are maintained or, enhanced where appropriate to support customary use.
291.82	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-O5 Access and use for customary purposes Mana whenua are able to access wāhi tūpuna f	Oppose	Considers the objective requires clarification that it does not imply a general right of access to wāhi tūpuna and that access should be with landowner permission. Considers the Trespass Act is impractical for managing access and may strain iwi–landowner relationships.	Seeks to amend as follows: Mana whenua are able to access, where appropriate, wāhi tūpuna for customary purposes and are able to use mahika kai resources in accordance with tikaka and with landowner agreement.
291.83	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-P1 Identification of wāhi tūpuna Working with mana whenua, identify, on Planning m	Support	No specific reason given	Retain as notified

291.84	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-P2 Mana whenua involvement in resource management processes Provide for the invol	Oppose	Considers the policy should clarify whether rules apply only where wāhi tūpuna values remain, or even where they've been physically altered but still hold cultural significance. Considers that consultation for all activities within or near wāhi tūpuna areas places a significant burden on landowners and mana whenua and the policy should be more targeted, directing consultation and notification to situations where it would meaningfully support the protection or enhancement of wāhi tūpuna values.	Seeks to amend the SASM overlay to map only where the values are known to still exist. If the maps cannot be changed, seeks to amend as follows: Provide for the involvement of mana whenua in resource management processes affecting identified wāhi tūpuna by encouraging consultation and engagement with mana whenua prior to undertaking activities which will have an adverse effect on the maintenance or enhancement of~~or applying for resource consent within or adjoining~~identified wāhi tūpuna.
291.85	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-P3 Management of wāhi tūpuna Only allow or provide for land use and development in id	Support	Support with amendment to provide for the protection of existing uses.	Seeks to amend as follows: ~~Only allow or provide for~~Ensure new land use and development inidentified wāhi tūpuna ~~where it~~ avoids significant adverse effects, and avoids, remedies or mitigates other adverse effects, on the remaining values associated with these areas, having particular regard to: ...
291.86	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-P4 Obstruction of mauka, tuhituhi neherā and wai māori by structures Avoid the loc	Support	Support is given in part to SASM-P4, with a preference for clearly identifying the locations of mauka, tuhituhi neherā, and wai māori on District Plan maps to guide where structures should be avoided. Considers provision should also be made for compatible structures that support land uses enhancing wāhi tūpuna values, and the policy should explicitly protect existing uses while avoiding vague terms like "or near."	Seeks to amend as follows: Avoid the location of new structures in riparian margins, on ~~or near~~ limestone outcrops, on upper slopes and on ~~or near~~ ridgelines unless: 1. they do not obstruct views to and across culturally significant waterbodies, tuhituhi neherā or mauka; and 2.~~they avoid adverse effects on the~~ the structure can maintain or enhance the wāhi tūpuna values of these areas.
291.87	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-P5 Protection of integrity of tuhituhi neherā Avoid the following activities on, o	Oppose	Concerns with the assumptions in irrigation modelling used to assess impacts and considers evidence suggests water loss may be overestimated and low-rate irrigation can avoid adverse effects. Considers that while the intent to protect tuhituhi neherā is supported, the policy should acknowledge that some existing agricultural and forestry activities have been compatible with these values and may continue to be so.	Seeks to permit and encourage low-rate irrigation and discourage high-rate irrigation [refer to original submission]. Also seeks for the protection of existing uses to be explicitly provided for in SASM-P4. Seeks to amend as follows: Avoid the following new activities on areas mapped as, ~~or in close proximity to~~, limestone outcrops. 1.~~agricultural intensification~~ high-rate irrigation; and 2. plantation forestry, unless any adverse effects on the integrity oftuhituhineherāfrom disturbance of land and vegetation and changes in the water table, soil water environment and air moisture are avoided.

291.88	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-P6 Culturally incompatible activities Avoid degradation of the values of wāhi tūpu	Support	No specific reason given.	Seeks to retain as notified.
291.89	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-P7 Habitat restoration and enhancement Encourage restoration and enhancement of indig	Support	No specific reason given.	Seeks to retain as notified.
291.90	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-P8 Mahika kai activities Enable mana whenua to undertake mahika kai activities in ide	Support	Support in part with a request for modification, as the PDP does not grant general access rights or transfer ownership of mahika kai resources, and the current user notes lack legal standing and clarity on ownership. Considers the policy should be reworded to more accurately reflect how the objective will be achieved while fostering respectful relationships between landowners and iwi.	Seeks that the PDP should clarify that landowner permission is required to undertake mahika kai. Also seeks to amend as follows: Enable mana whenua to undertake mahika kai activities in identified wāhi tūpuna ,in accordance with tikaka and with landowner agreement.
291.91	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-P9 Access for customary purposes Maintain existing access opportunities and encourage	Support	Support in part with a request to clarify that it does not create a general right of access to wāhit ūpuna on private land and that access should remain subject to landowner permission. Considers the policy should be reworded to reflect existing legal frameworks and practical considerations, ensuring respectful relationships and sustainable resource management.	Seeks to amend as follows: Maintain existing access opportunities and encourage enhancement of access, where appropriate, for mana whenua to identified wāhi tūpuna for customary purposes with landowner agreement.
291.92	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-P10 Wilding conifer species Protect wāhi tūpuna from modification by wilding conifer	Support	No specific reason given.	Seeks to retain as notified.
291.93	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-R1 Mahika kai activities within a wāhi tūpuna identified in SCHED5 – Sites and Areas of S	Support	Support in part with modifications.	Seeks to amend as follows: Activity status: Permitted Where: PER-1: An agreement is reached with the landowner permitting access and use of resources. Activity status when compliance is not achieved: ~~Not Applicable~~Prohibited Note: The provisions in this rule do not override the provisions of the Trespass Act 1980. There is no general right of public access across private land or right to use private resources.
291.94	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-R2 Buildings and structures within a wāhi tūpuna identified in SCHED5 - Sites and Areas o	Oppose	Opposes in part, as the 200m^2 threshold lacks justification and may unnecessarily increase consent requirements, while compatible structures that support wāhi tūpuna values should be distinguished. A 6m height limit for buildings and 25m for structures such as silos is supported, and low-rate irrigation	Seeks to amend as follows: Activity status: Permitted Where:

					infrastructure should be permitted within 100m of limestone cliffs to avoid unintended environmental impacts. The rule should clarify restricted discretionary matters, avoid unnecessary expert assessments, and ensure access, alternatives, and enhancement requirements are practical and proportionate [refer to original submission].	PER-1 The building or structure has a maximum building footprint of ~~200~~350m2; and PER-2 The building ~~or structure~~ has a maximum height of 6m as measured from the existing natural ground level; and PER-3 The structure has a maximum height of 25m; and ~~PER-3~~PER-4 The building or structure is not located within 20m of a waterbody or 50m of a wetland (excluding farm buildings or farm structures less than 10m2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating);and ~~PER-4~~PER-5 The building or structure is not located on, or within, 100m of a limestone escarpment (excluding farm buildings or farm structures less than 10m2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating); and ~~PER-5~~PER-6 The building or structure is not located on or within 20m vertical distance of a ridgeline (excluding farm buildings or farm structures less than 10m2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating); and ~~PER-6~~PER-7 The building or structure is located at an elevation less than 900m above sea level (excluding farm buildings or farm structures less than 10m2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating). Matters of discretion are restricted to: 1. whether the relevant rūnakah as been consulted, the outcome of that consultation, and the extent to which the proposal responds to, or incorporates the outcomes of that consultation; and 2. the ~~potential~~adverse effects on the values of the wāhi tūpuna, and the relationship of mana whenua with the area, including: a. loss of wāhitūpunaassociations through modification of the landscape and natural processes; and ~~b. damage to the integrity of wāhitūpunathrough disturbance of land and/or indigenous vegetation; and~~

						c. disturbance of wāhitapuand archaeological sites; and d. adverse effects on the ~~integrity~~preservation of tuhituhi neherā sites ~~including through disruption of the landform or water balance in the area~~; and e. adverse effects on the mauri of waterbodies; and f. reduction in the extent and quality ofmahikakai; and ~~g. loss of access to mahika kai for customary activities; and~~ 3. effects on sites where there is the potential for kōiwi or artefacts to be found, including consideration of the need to impose an accidental discovery protocol or have a cultural monitor present; and ~~4. whether there are alternative methods, locations or designs that would avoid or reduce the impact on the values associated with wāhitūpuna; and~~ ~~5. the appropriateness of any mitigation measures, including monitoring, planting or improved access for customary use; and~~ ~~6. whether the proposal provides an opportunity to recognise mana whenua culture, history and identity associated with the wāhi tūpuna, and any potential to:~~ ~~a. affirm the connection between mana whenua and the wāhi tūpuna; or~~ ~~b. enhance the cultural values of the wāhi tūpuna~~ Activity status when compliance is not achieved: ~~Non-Complying~~Discretionary Where: ~~NC-1~~DIS-1 Compliance is not achieved with PER-3, PER-5 and/or PER-6 Notification: Any application made under RDIS-1 and/or NC-1 may be notified to Te Rūnanga o Moeraki
291.95	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-R3 Indigenous vegetation clearance within a wāhi tūpuna, identified in SCHED5 - Sites and	Support	Support with request tomodifythe rule so it does not discourage landowners from planting new indigenous vegetation, and to allow a permitted pathway for indigenous vegetation removal where landowners have certified Freshwater Farm Plans.	Seeks to amend as follows: PER-1 ... k. improved pasture ... PER-4 The indigenous vegetation was planted after 1st March 2025 and complies with a certified Freshwater Farm Plan.

291.96	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-R4 Earthworks within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significanc	Oppose	Oppose in part as it excludes earthworks for permitted building platforms and would create unnecessary consent requirements for routine activities, especially where SASM overlays cover farm bases and improved pasture with no archaeological value. The submitter suggests either removing SASM overlays from such areas or modifying the rule to increase earthworks thresholds (e.g., to 3m cut and 1,000m^2 area), manage effects through permitted activity criteria, and use boundary setbacks in residential settings, thereby reducing the consent burden while still protecting genuinely sensitive sites	[refer to original submission for full relief sought] Seeks to amend as follows: [GRUZ/RLZ/OSZ]: PER-3 The permitted activity standards of EW-R1 are complied with; and PER-4 Earthworks are set back 100m from tuhituhi nehera and complies with a certified Freshwater Farm Plan; and PER-5 Earthworks are set back 20m from mahikakai resources; and PER-6 Access to mahika kai resources is not obstructed; and ... PER-9 The earthworks are associated with any permitted activity under SASM-R2. [GRZ/SETZ] Where: ~~PER-5~~PER-10 All earthworks where they comply with the following earthworks standards where relevant: 1. EW-S1 Threshold areas [submitting change to 1,000m]. 2. EW-S2 Maximum cut depth and fill height [submitting change to 3m cut and fill depth]; and 3. EW-S4 Earthworks within 20 metres of a waterbody
291.97	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-R5 Urupā within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significance to	Support	Support for existing urupā, but request that new urupā be treated the same as cemeteries due to similar environmental effects, while acknowledging their different cultural and spiritual significance.	Seeks to retain as notified.
291.98	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-R6 Amenity planting and shelterbelts within a wāhi tūpuna, identified in SCHED5 – Sites a	Support	Support but considers specific provision to permit existing shelterbelts within 100m of limestone escarpments is required.	Seeks to amend as follows: Where: PER-1 The new amenity planting or shelterbelt is not located on or within 100m of a limestone escarpment.

291.99	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-R7 Natural hazard mitigation structures within a wāhi tūpuna, identified in SCHED5 - Site	Support	Support with modification to allow a permitted pathway for councils or private applicants to create natural hazard structures, provided iwi are consulted to ensure any permitted activity pathway addresses potential effects on cultural values.	Seeks to consult with iwi regarding effects they wish to manage with SASM-R7 and what a permitted activity pathway could be. Amend as follows: Activity status ~~Restricted Discretionary~~Permitted PER-1 Fish passage is not impeded. ~~Where:~~ ~~RDIS-1~~ ~~The structures are erected by, or on behalf of, Waitaki District Council, Otago Regional Council, or Canterbury Regional Council.~~ ~~Matters of discretion are restricted to:~~ ~~1. The matters of discretion listed in SASM-R2 RDIS-1.~~ Notification: Any application made under ~~this rule~~DIS-1 may be notified to Te Rūnanga o Moeraki.
291.100	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-R8 Agricultural intensification within a wāhi tūpuna, identified in SCHED5 - Sites and Ar	Oppose	No specific reason given.	[refer to original submission]
291.101	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-R9 Commercial outdoor recreation within a wāhi tūpuna, identified in SCHED5 - Sites and A	Support	Support if SASM overlays are adjusted to exclude improved pasture, otherwise, opposes the rule as considers it unnecessarily restricts landowner diversification in less sensitive areas withoutclear evidenceof adverse effects. Considers iwi oversight is justified for archaeological sites, but requiring consent for recreation in non-sensitive areas needs strong justification.	Seeks to delete the rule if the SASM mapping remains.
291.102	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-R10 Plantation forestry activities within a wāhi tūpuna, identified in SCHED5 - Sites and	Support	No specific reason given.	Seeks to retain as notified.
291.103	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-R11 Mining activities, farm quarries or quarrying activities within a wāhi tūpuna, identi	Oppose	Oppose in part requesting that farm quarries be excluded from the rule and permitted with appropriate setbacks from sensitive sites, so properties mostly covered by a SASM overlay can still meet operational needs. Considers existing quarries should remain permitted, and the rule could be supported if the overlay mapping is rationalised as submitted.	Seeks to amend as follows: New mining activities, farm quarries or quarrying activities within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significance to Māori Activity status: ~~Discretionary~~ Permitted Where: PER-1 The farm quarry is set back 100m from tuhituhi nehera, waterways, limestone escarpments, archaeological sites and cemeteries or urupa.

						~~DIS-1~~PER-2 Gravel extraction is required for flood mitigation works. undertaken by a regional council. Notification: Any application made under NC-1~~this rule~~may be notified to Te Rūnanga o Moeraki.
291.104	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-R12 Cemeteries or crematoria within a wāhi tūpuna, identified in SCHED5 - Sites and Areas	Support	No specific reason given.	Seeks to retain as notified.
291.105	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-R13 Landfills within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significanc	Support	No specific reason given.	Seeks to retain as notified.
291.106	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-R14 Wastewater treatment plants within a wāhi tūpuna, identified in SCHED5 - Sites and Ar	Support	No specific reason given.	Seeks to retain as notified.
291.107	Peter and Janine Stackhouse	Sites and Areas of Significance to Maori	SASM-R15 Planting wilding conifer species within a wāhi tūpuna, identified in SCHED5 - Sites a	Support	No specific reason given.	Seeks to retain as notified.
291.108	Peter and Janine Stackhouse	Earthworks	General	Oppose	Oppose in part noting that small-scale, occasional earthworks are essential for primary production, land management, and health and safety, and are critical to the economic and sustainable management of land and water resources.	No specific relief sought.
291.109	Peter and Janine Stackhouse	Earthworks	EW-O1 Earthworks activities Earthworks activities enable people and communities, social	Support	No specific reason given.	Seeks to retain as notified.
291.110	Peter and Janine Stackhouse	Earthworks	EW-O3 Protecting communities Earthwork activities are undertaken in a manner that maint	Support	No specific reason given.	Seeks to retain as notified.
291.111	Peter and Janine Stackhouse	Earthworks	EW-O2 Protecting sensitive environments Indigenous biodiversity, natural landscapes, natur	Support	Support with modification to clarify and narrow scope by defining “natural landforms,” referencing “Significant Natural Areas” for indigenous biodiversity and aligning references to “natural landscapes” and “natural features” with Outstanding Natural Landscapes and Features, while ensuring existing earthworks in sensitive environments can continue. Considers the objective should also reference ‘Historic and Cultural Values’ for clarity and efficiency and protect long-standing activities like the Oamaru Stone Quarry within sensitive environments.	Seeks to amend as follows: ~~Indigenous biodiversity~~Significant Natural Areas, Outstanding natural landscapes, ~~natural landforms,~~Outstanding natural features, ~~mana whenua~~and historic and cultural ~~heritage~~ values are protected from the adverse effects of new earthworks.

291.112	Peter and Janine Stackhouse	Earthworks	EW-P1 Enabling earthworks Enable earthworks where the scale, extent and effects are approp	Support	No specific reason given.	Seeks to retain as notified.
291.113	Peter and Janine Stackhouse	Earthworks	EW-P2 Protecting sensitive environments Provide for earthworks where adverse effects on th	Support	No specific reason given.	Seeks to retain as notified.
291.114	Peter and Janine Stackhouse	Earthworks	EW-P3 Conservation activities within sensitive environments Enable earthworks that facilit	Support	No specific reason given.	Seeks to retain as notified
291.115	Peter and Janine Stackhouse	Earthworks	EW-P4 Primary production activities Enable earthworks that support the operational effi	Support	Support with modification to allow earthworks for installing identified infrastructure and farm buildings, as considers these are managed by existing standards and provide positive environmental effects. Considers enabling primary production activities should be maximised outside sensitive environments, which are already protected by other plan provisions.	Seeks to amend as follows: Enable earthworks that support the operational efficiency of primary production activities, including the construction, maintenance and repair of existing farm tracks, farm buildings, yards, irrigation systems, fences, dams, stormwater infrastructure, sedimentation ponds, culverts and stormwater drains.
291.116	Peter and Janine Stackhouse	Earthworks	EW-P5 Construction and maintenance of farm tracks and recreational tracks Enable earthwork	Support	No specific reason given.	Seeks to retain as notified.
291.117	Peter and Janine Stackhouse	Earthworks	EW-P6 Earthworks within the National Grid Yard Enable earthworks within the National Grid	Support	No specific reason given.	Seeks to retain as notified.
291.118	Peter and Janine Stackhouse	Earthworks	EW-P7 The effects of earthworks Manage any earthworks to avoid, remedy or mitigate adve	Support	Support with modification to clarify that effects should be controlled beyond the site boundary and that visual amenity and local amenity values should only apply off-site and in sensitive environments, while removing soil quality as it is a regional council matter.	Seeks to amend as follows: Manage any earthworks to avoid, remedy or mitigate adverse effects on the following: 1. the stability of land, buildings and structures at or beyond the boundary of the site; and 2. the visual amenity values of the site in a sensitive environment, and after rehabilitation; and ~~3. natural landforms; and~~ 4. local amenity values beyond the boundary of the site; and 5. erosion and sediment loss from the site; and ~~6. natural hazard risk; and~~ 7. the stormwater management systems; and 8. dust, lighting, odour, vibration, noise and traffic beyond the boundaries of the site; and ~~9. soil quality.~~
291.119	Peter and Janine Stackhouse	Earthworks	EW-P8 Rehabilitation of disturbed ground Enable earthworks that enhance, restore or rehabi	Support	Support with modification that restoration should not always reflect the surrounding landform and vegetation, but enhancement or rehabilitation may require different approaches such as replacing undesirable species with more suitable ones.	Seeks to amend as follows:

					Considers the policy should enable positive changes rather than require strict replication of existing conditions.	Enable earthworks that enhance, restore or rehabilitate areas of disturbed ground ~~to reflect the surrounding landform and vegetation.~~
291.120	Peter and Janine Stackhouse	Earthworks	EW-R1 General earthworks located outside of a sensitive environment All zones Activit	Support	Support with modified standards as detailed below [refer to original submission].	Seeks to retain as notified but with amended standards [refer to original submission]
291.121	Peter and Janine Stackhouse	Earthworks	EW-R2 Earthworks for repair and maintenance activities within or outside of a sensitive enviro	Support	Support with the addition of construction of infrastructure and farm buildings, so that earthworks for house builds or small sheds are permitted without unnecessary extra consent, while large-scale construction remains controlled by existing thresholds.	Seeks to amend as follows: Earthworks for <u>construction</u>, repair and maintenance activities within or outside of a sensitive environment PER-1 ... <u>10. farm buildings; and</u> <u>PER-3</u> <u>Earthworks undertaken for the lawful establishment of:</u> <u>1. farm tracks;</u> <u>2. yards;</u> <u>3. water supply and irrigation systems;</u> <u>4. fences;</u> <u>5. dams/ponds;</u> <u>6. walking and cycling tracks;</u> <u>7. driveways and accessways;</u> <u>8. stormwater infrastructure, sediment detention ponds, culverts and stormwater drains;</u> <u>9. coastal hard protection structures;</u>
291.122	Peter and Janine Stackhouse	Earthworks	EW-R3 Earthworks for the construction of farm tracks, public footpaths, public bridle paths an	Support	Support with amendment to allow wider dairy tracks (at least 6.5–8m) and accommodate larger machinery, as recommended by Dairy NZ and typical for the Waitaki District.	Seeks to amend as follows: Where: PER-1 The track is associated with a permitted or lawfully established activity within the zone and does not exceed ~~4~~ <u>8</u>metres in width with an additional allowance of 1 metre either side of the track for battering; and
291.123	Peter and Janine Stackhouse	Earthworks	EW-R4 Earthworks for conservation activities within a sensitive environment All zones	Support	Support with a higher threshold, as considers requiring consent for conservation earthworks in sensitive environments could discourage important activities like fencing SNAs or planting indigenous species.	Seeks to either permit the relevant earthworks thresholds for the underlying zone or increase the threshold within all conservation activities rules. Seeks to amend as follows:

						Earthworks for conservation activities within a riparian margin or sensitive environment Activity status: Permitted Where: PER-1 ~~On any site earthworks do not exceed 25m2 in area over any 3 year period.~~ ~~PER-2~~ All of the following standards are complied with: 1. EW-S2 Maximum cut depth and fill height; 2. EW-S3 Earthworks on sloping sites; and ~~3. EW-S4 Earthworks within 20m of a waterbody.~~ Activity status when compliance is not achieved: Restricted Discretionary Where: RDIS-1 Compliance is not achieved with ~~PER-2~~ PER-1 Matters of discretion are restricted to: 1. the matters of discretion listed in any of thestandardsEW-S2, EW-S3 and/or EW-S4 that are not complied with. ~~Activity status when compliance is not achieved: Discretionary~~ ~~Where:~~ ~~DIS-1~~ ~~Compliance is not achieved with PER-1~~
291.124	Peter and Janine Stackhouse	Earthworks	EW-R5 Earthworks within a riparian margin All zones Activity status: Permitted Wher	Support	Support with modifications to clarify the distinction between regional and district council responsibilities, remove duplication in matters of discretion, permit maintenance of water supply systems, and limit consideration of cumulative effects to those specifically identified.	Seeks to amend as follows: PER-3 ... c. water supply or irrigation systems; Matters of discretion are restricted to: ... 2. the extent and management of adverse effects or cumulative effects on natural character of the riparian margin, including: a. the extent to which the proposed earthworks will: i. allow natural elements to dominate; and

						~~ii. introduce man-made elements to the riparian margin; and~~ iii. affect the amenity values of the riparian margin; and iv. create disturbances that will be ... ~~ix. restrict access for mahika kai purposes; and~~ ~~3. any cumulative effects.~~
291.125	Peter and Janine Stackhouse	Earthworks	EW-R6 Earthworks and land disturbance within the National Grid Yard All zones Activit	Support	No specific reason given.	Seeks to retain as notified.
291.126	Peter and Janine Stackhouse	Earthworks	EW-R7 Earthworks within a sensitive environment All zones Activity status: Discretion	Support	No specific reason given.	Seeks to remove area thresholds, so they default to regional council thresholds and introduce standards or permitted activity criteria to manage the effects of earthworks directly. If threshold areas are to remain seeks to increase threshold to 1,000m2 for all zones. Seeks to amend as follows: Matters of discretion are restricted to: 1. whether earthworks changing the landform of a ridgeline are of a type, scale and form that is appropriate for the location and anticipated character of the zone; and 2. the management of silt, sediment and erosion on-site; and 3. impacts on amenity values beyond the site boundary, including whether the cut face and/or any retaining structures can be concealed behind development or effectively landscaped; and 4.landscape treatment, site reinstatement and screening; and ... ... tified.
291.127	Peter and Janine Stackhouse	Earthworks	EW-S1 Threshold areas (m2) All Residential Zones Rural Lifestyle Zone Settlement Zo	Oppose	Considers that area thresholds are an inadequate tool for managing earthworks as they focus on the size of the activity rather than its environmental impact and effect management should take precedence over area measurement. Considers that thresholds should be used as matters of discretion or permitted activity criteria, not rigid limits and that the current thresholds are too low, capturing routine activities like house scrapes, silage pits, and shed construction. Also considers that the standards duplicate those in the NFL chapter, regarding	Seeks to remove area thresholds so they default to the regional council thresholds and introduce standards or permitted activity criteria to manage the effects of earthworks directly. If threshold areas are to remain, seeks to increase to be consistent with the enabling intent of EW-O1, EW-P1, EW-P3, and EW-P4. Seeks to remove all requirement for landscape assessment from

					landscape effects, which are subjective and undefined outside NFL overlays.	matters of discretion. Seeks to remove reference to natural form which is not defined. Seeks to amend as follows: All/RLZ/SETZ: The quantity of earthworks must not exceed ~~300m2~~ 1,000m2 in any 12 month period per site. GRUZ/CMUZ/SPZMM: The quantity of earthworks must not exceed ~~500m2~~ 1,000m2 in area in any 12 month period per ~~site~~100ha. Matters of discretion are restricted to: 1. whether ~~the~~ earthworks changing the landform of a ridgeline are of a type, scale and form that is appropriate for the location and anticipated character of the zone; and 2. the management of silt, sediment and erosion on-site; and 3. impacts on ~~character and~~ amenity values beyond the site boundary, ~~natural landforms and features~~, including whether the cut face and/or any retaining structures can be concealed behind development or effectively landscaped; and 4.~~visual amenity, including~~ landscape treatment, site reinstatement and screening; and ~~5. the potential for cumulative effects on the natural form of the landscape; and~~ 6. whether the earthworks involve the removal of topsoil or subsoil from a site that is identified as having a Land Use Capability classification of 1, 2 or 3; and 7. duration of the earthworks and hours of operation; and 8. the management of the effects of dust, vibration, noise, lighting, odour and traffic movements at or beyond the boundaries of the site. ~~Note: A landscape assessment may be required for the assessment of this standard.~~ Note: A site management plan may be required for consideration of matters of discretion (2), (7) and (8) in EW-S1.
291.128	Peter and Janine Stackhouse	Earthworks	EW-S2 Maximum cut depth and fill height The cut depth or fill height must not exceed 1	Support	Support for EW-S2 with modification to reduce the number of consents that will be required across the district.	Seeks to amend as follows: 1. The cut depth or fill height must not exceed ~~1.5~~3metres as measured vertically; and

						2. Cut or fill supported by a retaining wall must be setback a distance at least equal to the height of the retaining wall. 3. Cut and fill equal to or less than 0.5m in height is exempt from this standard. 4. Cut and fill for building platforms is exempt from this standard. 5. Earthworks over 1.5m in height or depth that take place within 1.5m of a site boundary require a written approval from the adjoining landowner. ~~Note: Earthworks over 1.5m in height or depth that take place within 1.5m of a site boundary may require a written approval from the adjoining landowner.~~
291.129	Peter and Janine Stackhouse	Earthworks	EW-S3 Earthworks on sloping sites Earthworks must not take place on slopes with an ang	Support	No specific reason given	Retain as notified
291.130	Peter and Janine Stackhouse	Earthworks	EW-S4 Earthworks within 20 metres of a waterbody Earthworks shall not take place withi	Support	Support with modification to reduce consent costs and improve clarity around when ecological or landscape reports are required.	Seeks to amend as follows: Matters of discretion are restricted to: 1. the provision of sediment control techniques to ensure sediment run-off does not enter a waterbody; and 2. effects of earthworks within 5m of the waterbody on the natural character and ecological values of the waterbody; and ~~3. impacts on the character and amenity values, natural landforms and features; and~~ ~~4. management of visual amenity effects through~~landscape treatment, site reinstatement and screening; and ~~5. the potential for cumulative effects on the natural form of the landscape.~~ Note: A site management plan may be required for consideration of the assessment matter 1. Note: An ecological report ~~and/or landscape assessment~~ may be required for consideration of matters of discretion (2),~~(3), (4) and (5)~~in EW-S4.
291.131	Peter and Janine Stackhouse	Earthworks	General	Support	Support the rules, objectives and policies overall especially EW(Q)-P1 for farm quarries, as enabling on-farm aggregate use benefits the environment by reducing road wear and transport emissions.	Seeks to retain as notified.

291.132	Peter and Janine Stackhouse	Earthworks	EW(Q)-P4 Existing quarries Enable the continued operation of existing lawfully established	Support	Support the protection of existing quarries beyond existing use rights, as considers it is critical to avoid excessive consent barriers that could threaten their continued operation, similar to the challenges faced by landfills.	Seeks to retain as notified.
291.133	Peter and Janine Stackhouse	Earthworks	EW(Q)-R1 Farm quarry General Rural Zone Special Purpose Zone - Macraes Mining Activ	Support	Support with modification, as considers the current restriction on quarrying in sensitive environments is too broad and prevents the benefits of farm quarrying across much of the district. Considers the rule should be proportionate to the scale limits already in place and earthworks in sensitive environments are managed by other chapters.	Seeks to amend as follows: PER-6 The farm quarry is not located within ~~a sensitive environment or within~~ the Coastal Environment or Coastal Natural Hazard overlays
291.134	Peter and Janine Stackhouse	Earthworks	EW(Q)-R4 Quarrying activities (excluding farm quarry and restricted use quarry) Special	Support	Support with modification for consistency, as the current daily extraction limit of 100m3 is inconsistent with the allowed number of heavy vehicle trips in (CON-4).	Seeks to amend as follows: CON-3 The quantity of aggregate extracted is limited to ~~100m3~~200m3day; and
291.135	Peter and Janine Stackhouse	Earthworks	General	Support	General support but considers that quarrying activities currently captured by the mining definition should instead be managed under quarrying provisions to ensure protection for existing quarries.	Seeks to retain as notified but with changes to mineral definition as submitted.
291.136	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	General	Oppose	Oppose the chapter in part - considers proceeding with identifying new SNAs before the government's review and changes to the NPS-IB will create unnecessary and repeated requirements for landowners and the community, especially given the current suspension of council obligations to identify new SNAs until October 2027.	Seeks to retain the existing policy and rule framework for managing indigenous biodiversity in the ODP and implement only the requirements of the NPS-IB where SNAs have already been identified by the current/operative district plan. Seeks to defer the wider chapter review until there is more certainty from government and until such time that the review of the NPS-IB has occurred.
291.137	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-O1 Halt the decline of indigenous biodiversity Halt the decline of the Waitaki Dist	Oppose	Oppose in part, supporting the management of indigenous biodiversity in line with national direction, but seek amendment to focus maintenance and enhancement efforts on significant habitats and fauna, rather than requiring resource-intensive calculations across all zones. Considers the objective should prioritize consistency with national policy and target significant areas for enhancement where appropriate.	Seeks to amend as follows: ~~Halt the decline~~Manage of the Waitaki District's indigenous biodiversity ~~so there is at least no overall loss, including between species and ecosystems,~~ by maintaining and, where appropriate, enhancing indigenous biodiversity, in areas of mapped significant indigenous habitats and significant fauna (Significant Natural Areas)~~and to achieve this~~by: 1. protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity while providing for the social, cultural and economic wellbeing of people and communities now and in the future; and 2. recognising the mana of takata whenua ~~as~~to exercise kaitiaki ~~of~~in relation to maintaining, enhancing and restoring indigenous biodiversity; and 3. recognising people and communities, including landowners, as guardians of indigenous biodiversity.

291.138	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-O2 Identify and protect Significant Natural Areas Areas identified as Significant Natu	Oppose	Oppose in part, seeking modification for clarity and consistency with ECO-O1, and to ensure the objective focuses on the purpose of identifying SNAs, involves transparent partnership with landowners, and does not discourage new indigenous plantings. Considers SNAs should only be identified where indigenous biodiversity already exists as of March 1,2025and the process should recognise the role of sustainable land uses in maintaining significant values and avoid duplicating efforts or undermining trust with landowners.	Seeks to amend as follows: ECO-O2 Identify ~~and protect~~Significant Natural Areas ~~Areas identified as Significant Natural Areas are protected to ensure no net loss of indigenous biodiversity or indigenous biodiversity values as a result of land use activities~~. Work with people and communities, including mana whenua with the owners, to identify Significant Natural Areas of indigenous biodiversity established in accordance with the NPS-IB.
291.139	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-O3 Restore or enhance Significant Natural Areas Significant Natural Areas are resto	Support	Support in part, agreeing that restoration and enhancement should be encouraged where appropriate, but also emphasising the need to allow appropriate development where area values can be maintained, as many existing land management practices have already supported significant indigenous habitats and fauna.	Seeks to amend as follows: Existing mapped Significant Natural Areas are restored or enhanced, where appropriate and provision is made for the appropriate subdivision, use and development where the values of the area can be maintained.
291.140	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-P1 Evaluation of Significant Natural Areas Identify the ecological significance of	Oppose	Considers ECO-P1 should be deferred until the government review of the NPS-IB is complete.	Seeks for the deletion of ECO-P1 [refer to original submission for full relief sought] If ECO-P1 is not deleted, seeks to amend as follows: Work with mana whenua and land owners to identify the ecological significance of indigenous vegetation and habitats of indigenous fauna established before 1st March 2025 using; ~~1. the criteria contained in APP5 – Criteria for identifying areas that qualify as Significant Natural Areas (SNA); or~~ 1. The criteria in the NPS IB; or 2. in the case of Crown owned land, Clause 3.8(8) of the National Policy Statement on Indigenous Biodiversity and: ~~3. where they are known and meet the criteria to be SNA's, list them in SCHED6 Significant Natural Areas and on the Planning Maps;~~ ~~3. where they are not known,~~applying the criteria through the resource consent process, notice of requirement, outline plan, or other planning processes, to determine an area's significance; and 4. if a new Significant Natural Area is identified as a result of a resource consent application, include the SNA in SCHED6 – Significant Natural Areas in the next appropriate plan review or plan change notified by Waitaki District Council.
291.141	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-P2 Protection of Significant Natural Areas Except as provided for in clause 2 belo	Support	Support in part, with modification to split into simpler policies for clarity and ensuring sustainable land uses can continue alongside SNAs where effects are managed so landowners can maintain Pest control and reinvestment in significant natural areas.	Seeks to amend as follows: 1. Except as provided for in clause 2 below, protect Significant Natural Areas listed in SCHED6 – Significant Natural Areas by: a. ensuring the following adverse effects are avoided, remedied

						or mitigated on the: i. loss of ecosystem representation and extent; .... 2.~~The~~Manage any adverse effects of subdivision, use and development on identified SNA's ~~shall be managed~~ in accordance with 1.b. above only, in relation to the following activities: a. the new subdivision, use or development is required for the purposes of any of the following: i. construction or upgrade ~~(if the upgrade does not meet the requirements of clause 3.15(2) of the National Policy Statement on Indigenous Biodiversity)~~of specified infrastructure that provides significant national or regional public benefit: or ... v. there is a functional need or operational need for the new subdivision, use or development to be in that particular location; and ~~vi.~~there are no practicable alternative locations for the new subdivision, use or development;
291.142	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-P3 Appropriate activities within Significant Natural Areas Enable limited - earthw	Support	Support in part - [No specific reason given]	Seeks to amend as follows: Enable limited - ... 3. Is for a lawfully established activity; or 4. The activity as a functional need to be located in the area; or 5. The activity has no more than minor adverse effects on the significant indigenous vegetation of fauna or habitat.
291.143	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-P4 Supporting the maintenance, restoration and enhancement of indigenous biodiversity	Support	Support in part, seeking amendments to recognise that different areas may require different management approaches, that primary production can benefit indigenous biodiversity, and that eco-sourced planting should only be required where justified. Also notes that integrated management across administrative boundaries can only be encouraged, not enforced.	Seeks to amend as follows: ... 3. encouraging, ~~or where appropriate requiring,~~ the use of eco-sourced indigenous plantings where it is available; 4.~~ensuring it is managed~~encourage management in an integrated way, within, and across administrative boundaries; 5. giving effect to the decision-making principles set out in Clause 1.5 of the National Policy Statement on Indigenous Biodiversity; 6. recognising that maintaining indigenous biodiversity ~~requires~~can be achieved by:

						a. the maintenance and ~~at least~~no overall reduction of ~~all~~the following: ... 7. promoting increased indigenous vegetation cover in both urban environments and non-urban environments <u>where appropriate;</u> 8. requiring that significant adverse effects of activities on indigenous biodiversity (outside of SNA's or on specified Māori land) are managed by applying appropriate thresholds for indigenous vegetation clearance <u>which was established after 1st March 2025</u>, and where these are not met, by applying the biodiversity effects management hierarchy. <u>9. Recognising the benefits of farm management practices and active management of indigenous biodiversity including voluntary animal and plant pest and stock control and/or formal legal protection.</u>
291.144	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-P5 National priorities for protection Recognise the following national priorities f	Support	No specific reason given.	Seeks to retain as notified.
291.145	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-P6 Impacts of climate change on resilience of ecosystems Take into account the potenti	Support	Support in principle but suggests modifications to align with the NPS-IB by focusing on considering specific, known effects of climate change rather than speculative future impacts.	Seeks to amend as follows: ~~Take into account the potential future impacts~~<u>Consider the effects</u> of climate change to promote resilience of indigenous biodiversity to climate change: ...
291.146	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-P7 Providing for the relationship of takata whenua with indigenous biodiversity Pro	Support	No specific reason given.	Seeks to retain as notified.
291.147	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-P8 Indigenous vegetation on urban environment allotments Recognise that indigenous	Support	Support with a modification to include 'domestic curtilage' as defined in the plan, to ensure properties with septic tanks that don't meet the 'urban environment allotment' definition aren't unnecessarily subject to the ECO chapter's stricter requirements.	Seeks to amend as follows: Indigenous vegetation <u>on domestic curtilage</u>~~urban environment allotments~~ Recognise that indigenous vegetation <u>on domestic curtilage</u> ~~urban environment allotments~~is not protected, unless specifically scheduled in the plan as a Significant Natural Area or Notable Tree.
291.148	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-P9 Precautionary approach Adopt a precautionary approach to considering the adverse	Support	No specific reason given	Seeks to retain as notified.

291.149	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-P10 Provision for maintenance of improved pasture for primary production where it may affe	Support	Support with modifications to improve clarity by removing the subjective requirement for 'adequate evidence' of regular pasture maintenance, as the definition of pasture already implies this. Also consider that the clause excluding improved pasture that has become an SNA is unnecessary and circular, since such areas are already protected under SNA provisions.	Seeks to amend as follows: Allow for the maintenance of improved pasture to continue where: ~~1.there is adequate evidence to demonstrate that~~the maintenance of improved pasture is part of a regular cycle of periodic maintenance of that pasture; 2. any adverse effects of the maintenance of improved pasture on an identified SNA are no greater in intensity, scale, or character than the effects of activities previously undertaken as part of the regular cycle of periodic maintenance of that pasture; ~~3. the improved pasture has not, itself, become an SNA;~~ ~~4. the land is not an uncultivated depositional landform; and~~ 5. the maintenance of improved pasture will not adversely affect a threatened or at risk (declining) species.
291.150	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-P11 Highly mobile fauna In relation to habitats of highly mobile fauna: identify a	Oppose	Considers the policy should be deferred until the NPS-IB review is complete.	Seeks to delete ECO-P11. If retained, seeks modification to make it consistent with the NPS IB and prevent duplication between territorial authority and regional council [refer to original submission for full relief sought] Seeks to amend as follows: In relation to habitats of highly mobile fauna: 1.Assist the regional council to identify and manage areas outside of SNA's that support specified highly mobile fauna to maintain their populations across their natural range, and improve information and awareness around them; and 2. manage the adverse effects of activities on them, in order to maintain viable populations of specified highly mobile fauna across their natural range.
291.151	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-P12 Restoration of indigenous biodiversity In relation to restoration of indigenous	Support	No specific reason given	Seeks to retain as notified.
291.152	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-P13 Commercial forestry In relation to commercial forestry: the adverse effects of	Support	Support in part with appropriate management of commercial forestry within existing mapped SNA areas.	Seeks to amend as follows: In relation to commercial forestry: 1. the adverse effects of commercial forestry activities in any existing commercial forest on any identified SNA must be managed in a manner that: a. maintains indigenous biodiversity in the identified SNA as far as practicable; while b. providing for commercial forestry activities to continue; and 2. despite ECO-P2, any part of an identified SNA that is within an area of an existing commercial forest that is planted, or is intended to be, replanted in trees for harvest must be managed over the course of consecutive rotations of production in

						the manner necessary to maintain the long-term populations of any threatened or at risk (declining) species present in the area.
291.153	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-P14 Managing indigenous vegetation outside Significant Natural Areas Avoid signific	Oppose	Considers the policy is overly broad and imposes disproportionate cost and complexity across the district, despite the NPS-IB not requiring territorial authorities to avoid significant adverse effects on indigenous vegetation outside SNAs.	Seeks to delete the provision.
291.154	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-P15 Inappropriate activities within or near to Significant Natural Areas Prohibit t	Support	Support with modification to specify that only deliberate planting is included.	Seeks to amend as follows: Prohibit the deliberate planting of:
291.155	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-R1 Indigenous vegetation clearance outside of a Significant Natural Area listed in SCHED6	Support	Support, in particular the provision permitting indigenous vegetation clearance for existing established activities, provided appropriate thresholds or circumstances are met.	Seeks to retain as notified.
291.156	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-R2 Indigenous vegetation clearance within a Significant Natural Area listed in SCHED6 – Si	Support	Support in part, endorsing clearance of indigenous vegetation where there is a functional need within listed SNAs, but suggesting that minor breaches of permitted activity standards may not always warrant an ecological assessment and this should be reflected in the note.	Seeks to amend note as follows: Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any application made under this provision ~~must provide~~ will likely require, in addition to the standard information requirements, an Ecological Assessment, provided by a suitably qualified ecologist, that is commensurate with the scale and significance of the proposal, and meets the requirements of APP8 - ECO Chapter Information Requirements for Resource Consents.'
291.157	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-R3 Earthworks within a Significant Natural Area listed in SCHED6 – Significant Natural Are	Support	Support with modifications to improve practicality by allowing earthworks within mapped SNAs where there is a functional need, and reconsidering the 10 working days' notice requirement, which may not be feasible in cases like emergencies or weather delays. Additionally, minor earthworks exceeding permitted standards may not always justify an ecological assessment, and the note should reflect this flexibility.	Seeks to amend as follows: PER-3 Silt and sediment control measures are in place to prevent discharge of silt and/or sediment into the Significant Natural Area ~~and notice is provided to Council 10 working days prior to the commencement of works.~~ Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any application made under this provision ~~must provide~~will likely require, in addition to the standard information requirements, an Ecological Assessment, provided by a suitably qualified ecologist, that is commensurate with the scale and significance of the proposal, and meets the requirements of APP8 - ECO Chapter Information Requirements for Resource Consents.
291.158	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-R4 Exotic commercial forestry, agricultural intensification, quarrying activity or mining	Support	No specific reason given	Seeks to retain as notified with Matters of Discretion in the correct column.

291.159	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-R5 Commercial forestry, agricultural intensification, quarrying activity or mining activit	Support	No specific reason given	Seeks to retain as notified
291.160	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-R6 Planting non-indigenous vegetation within a Significant Natural Area listed in SCHED6 –	Support	Support in part, noting that a blanket prohibition on planting non-indigenous vegetation within SNAs could significantly impact existing primary production, and suggesting that such activities should be considered through a resource consent process where adverse effects can be appropriately managed.	Seeks to amend as follows: ~~Planting~~Deliberate planting of new non-indigenous vegetation within a Significant Natural Area listed in SCHED6 – Significant Natural Areas Activity status ~~Prohibited~~Discretionary
291.161	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-R7 Planting species that result in wilding conifers within a Significant Natural Area, or	Oppose	Oppose in part - should be clarified that only deliberate planting is controlled by ECO-R6 and ECO-R7.	Seeks to amend as follows: ~~Planting~~Deliberate planting of species that result in wilding conifers within a Significant Natural Area, or within 100m of a Significant Natural Area listed in SCHED6 – Significant Natural Areas
291.162	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-S1 Indigenous vegetation clearance in highly sensitive ecological environments that are no	Oppose	Oppose ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators.	[Refer to original submission for full relief sought] Seeks to amend as follows: Indigenous vegetation clearance in highly sensitive ecological environments that meet SNA criteria but are not currently identified as Significant Natural Areas Apart from maintenance of improved pasture, there~~There~~ shall be no indigenous vegetation clearance in the following locations:
291.163	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-S2 Indigenous vegetation clearance in sensitive ecological environments that are not curre	Oppose	Oppose ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification, and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators.	[Refer to original submission for full relief sought] Seeks to amend as follows: Indigenous vegetation clearance in sensitive ecological environments that meet SNA criteria but are not currently identified as Significant Natural Areas
291.164	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-S3 Indigenous vegetation clearance in threatened land environments Indigenous veget	Oppose	Oppose ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification, and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators.	[Refer to original submission for full relief sought] Seeks to amend as follows: Indigenous vegetation clearance in threatened land environments that meet SNA criteria but are not currently identified as Significant Natural Areas.

291.165	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-S4 Indigenous vegetation clearance areas dominated by snow tussock Indigenous vegetati	Oppose	Oppose ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators.	[Refer to original submission for full relief sought] Seeks to amend as follows: Indigenous vegetation clearance areas identified as dominated by snow tussock
291.166	Peter and Janine Stackhouse	Ecosystems and Indigenous Biodiversity	ECO-S5 General indigenous vegetation clearance If not addressed by ECO-S1 to ECO-S4, th	Support	Support ECO-S5 with amendments to ECO-S1 to ECO-S4.	Seeks to retain as notified
291.167	Peter and Janine Stackhouse	Natural Character	General	Support	General support for the chapter with modification to riparian margin definition.	Seeks to retain as notified with amendment to riparian margin definition
291.168	Peter and Janine Stackhouse	Natural Features and Landscapes	General	Support	Support in part but considers the stringent provisions applied to NFL overlays are disproportionate to the land types and the scale of coverage. [refer to original submission for full reasons]	Seeks to adjust the overlays so that stringent rules apply only to landscapes that are agreed with landowners as significant or outstanding.
291.169	Peter and Janine Stackhouse	SCHED9 – Schedule of Significant Natural Features	Ref. Significant Natural Feature Description Values and Characteristics	Support	[refer to original submission for full reasons]	Refer to original submission for full relief sought.
291.170	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-O1 Outstanding Natural Features and Landscapes Outstanding Natural Features and Landsc	Support	No specific reason given	Seeks to retain as notified
291.171	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-O2 Significant Natural Features and Rural Scenic Landscapes The values of Significant	Support	Supports in part the objective to protect Significant Natural Features and Rural Scenic Landscapes but suggests values should be maintained only where appropriate.	Seeks to amend as follows: The values of Significant Natural Features and Rural Scenic Landscapes are maintained where appropriate.
291.172	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-O3 Wilding conifers The impact of wilding conifers on Outstanding Natural Features and	Support	Supports in part the objective to reduce the impact of wilding conifers on landscape areas and suggests the policy should encourage reduction of these effects.	Seeks to amend as follows: Encourage the impact of wilding conifers on Outstanding Natural Features and Landscapes, Significant Natural Features, and Rural Scenic Landscapes is be reduced.
291.173	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-O4 Restoration and enhancement of landscapes Outstanding Natural Features and Landscap	Oppose	Opposes the objective as currently worded, arguing that it could result in subjective assessments and requiring restoration and enhancement of landscape values may not always be practicable and suggests limiting the requirement to where practicable	Seeks to delete NFL-O4 but seeks to amend as follows if retained: Where practicable, Outstanding Natural Features and Landscapes, Significant Natural Features, and Rural Scenic Landscapes are restored and enhanced, where their values listed in this plan have been lost or degraded.
291.174	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-P1 Identification of Outstanding Natural Features and Landscapes In relation to the	Support	Supports in part the policy for identifying Outstanding Natural Features, but recommends using the full Pigeon Bay criteria as current wording omits some of the criteria and could be misleading. Also considers the policy implies changes could occur outside of the plan change or review process.	SeekstodeleteNFL-P1. If retained, seeks to include all Pigeon Bay criteria and an additional requirement to work onsite in consultation with the land owner.

						Seeks also to include a note that changes will only occur through normal plan change or plan review.
291.175	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-P2 Identification of Significant Natural Features and Rural Scenic Landscapes In re	Support	Supports in part the policy for identifying SNF/RSL, but recommends using the full Pigeon Bay criteria as current wording omits some of the criteria and could be misleading. Also considers the policy implies changes could occur outside of the plan change or review process.	Seeks to delete NFL-P2 If retained, seeks to include all Pigeon Bay criteria and an additional requirement to work onsite in consultation with the land owner. Seeks also to include a note that changes will only occur through normal plan change or plan review.
291.176	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-P3 Recognise the importance of protecting natural features and landscapes Recognise:	Support	No specific reason given.	Seeks to retain as notified.
291.177	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-P4 Avoiding inappropriate activities on or within Outstanding Natural Features or Landscap	Support	Supports in part the policy to avoid inappropriate activities on Outstanding Natural Features and Landscapes, but considers there is ambiguity in the wording and seeks clearer discouragement of critical infrastructure in these areas and more precise identification of values.	Seeks to amend as follows: Only provide for subdivision, use and development where it: 1. protects the values identified in SCHED7 – Outstanding Natural Features and SCHED8 – Outstanding Natural Landscapes that make the natural feature or landscape outstanding; and ~~2. avoids, remedies or mitigates adverse effects on other Outstanding Natural Features and Landscapes values, including avoiding any significant loss of indigenous vegetation.~~ 2. avoids the placement of critical infrastructure within the Outstanding Natural Features and Landscapes unless there is no reasonable alternative due to the functional need for the location and the adverse effects on landscape values can be avoided or appropriately managed.
291.178	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-P5 Avoiding inappropriate activities on or within Significant Natural Features and Rural S	Support	Supports the policy for Rural Scenic Landscapes and Significant Natural Features, but requests clarification that only identified values are protected, to avoid ambiguity.	Seeks to amend as follows: Only provide for subdivision, use and development in Rural Scenic Landscapes and on Significant Natural Features where it: 1.maintains ~~amenity values; and~~the values identified in SCHED9 - Significant Natural Features and SCHED10 - Schedule of Rural Scenic Landscapes. ~~2. avoids, remedies or mitigates adverse effects on other values of Significant Natural Features or Rural Scenic Landscapes, including avoiding any significant loss of indigenous vegetation.~~
291.179	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-P6 Landscape's ability to absorb change When determining a landscape's ability to abso	Support	Supports the policy but only if other landscape overlays are corrected as requested for ONF029.	Seeks to conditionally retain as notified.
291.180	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-P7 Earthworks within identified natural features and landscapes When determining if ea	Support	Supports the policy but only if other landscape overlays are corrected as requested for ONF029 [ONF025 - refer to submission point 298.169].	Seeks to conditionally retain as notified.

291.181	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-P8 Buildings and structures on or within identified natural features and landscapes Wh	Support	Supports the policy but only if other landscape overlays are corrected as requested for ONF029 [ONF025 - refer to submission point 298.169].	Seeks to conditionally retain as notified.
291.182	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-P9 Subdivision on or within identified natural features and landscapes Avoid subdivisi	Support	Supports the policy but only if other landscape overlays are corrected as requested for ONF029 [ONF025 - refer to submission point 298.169].	Seeks to conditionally retain as notified.
291.183	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-P10 Wilding conifers Avoid the spread of wilding conifers by: prohibiting planting of	Support	Supports the policy but notes there is no incentive for landowners to remove wilding conifers and questions the effectiveness without council support.	Seeks to retain as notified but consider deleting clause (2) if there is no intention of following through.
291.184	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-P11 Enhancement and restoration of Outstanding Natural Features and Landscapes, Significan	Support	Supports in part the policy to enhance and restore landscapeareas, butsuggests restoration should only occur whereappropriate.	Seeks to amend as follows: Support the enhancement and where appropriate the restoration of Waitaki's Outstanding Natural Features and Landscapes, Significant Natural Features and Rural Scenic Landscapes where their values have been lost or degraded by:
291.185	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-R1 Buildings and structures (excluding fences) on or within Outstanding Natural Features o	Oppose	Opposes the rule as considers that small-scale farm buildings should be permitted as they are compatible with landscape management. Considers that if the ONF boundaries can be rationalised to only areas that are genuinely natural (not improved pasture) then NFL-R1 could be supported.	Seeks to amend as follows: Activity status: Permitted Where: PER-1 The structure is underground; or PER-2 The building or structure is for primary production purposes, excluding residential units; and PER-3 The building or structure does not exceed 30m2; and PER-4 The building or structure does not exceed 3m in height; and PER-5The building or structure complies with the following standard: 1. NFL-S1
291.186	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-R2 Buildings and structures (excluding fences) on or within Significant Natural Features o	Support	Supports in part but considers the rule should allow for minor buildings on Significant Natural Features as per the relief sought in submission point 298.185 or the same thresholds as in RSL.	Seeks to amend as follows: Activity status: Permitted Where: PER-1 The structure is underground; or

						PER-2 The building or structure is in a Rural Scenic Landscape ~~(except where it is also located on a Significant Natural Feature);~~and ...
291.187	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-R3 Permanent fencing on or within Outstanding Natural Features or Landscapes, Significant	Support	Supports in part but considers deer fencing up to 2.5m high be permitted for pest management.	Seeks to amend as follows: PER-2 Any fence or gates are no more than 1.5m high (except any deer fence which can be up to ~~2m~~2.5m high).
291.188	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-R4 Earthworks on or within Outstanding Natural Features or Landscapes or Significant Natur	Support	Supports in part but only if improved pasture is removed from ONFL overlays, otherwise, GRUZ earthworks rules should apply. Considers that earthworks are often needed to install tracks to give access for conservation efforts.	Seeks to conditionally retain as notified.
291.189	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-R5 Primary production activities (excluding buildings, mining activities, quarrying activi	Support	Supports the policy with modifications to the definition of agricultural intensification and requests removal of improved pasture from overlays.	Seeks to amend the definition of agricultural intensification and remove improved pasture from ONFL's and SNF's. [refer to original submission for full relief sought]
291.190	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-R6 Amenity planting and shelterbelts on or within Outstanding Natural Features or Landscap	Support	Supports permitting amenity planting and shelterbelts in landscape areas, provided the mapping is accurate.	Seeks to retain as notified.
291.191	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-R7 Outdoor recreational activities (excluding buildings) on or within Outstanding Natural	Support	Supports the rule with modification to exclude not-for-profit and charities from the definition of commercial activities.	Seeks to amend the definition of commercial activities and seeks to add a permitted activity criteria specifically for temporary events, or an advice note advising that the Temporary Events chapter overrides NFL-R7.
291.192	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-R8 Landscape restoration activities on or within Outstanding Natural Features or Landscape	Support	No specific reason given.	Seeks to retain as notified.
291.193	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-R9 Flood protection structures and flood protection works on or within Outstanding Natural	Support	Supports with modification to allow all people, not just councils, to undertake flood protection works.	Seeks deletion of PER-1 If retained, seeks to add a note to advise that emergency works are permitted under the RMA.
291.194	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-R10 Plantation Forestry within or on Significant Natural Features or Rural Scenic Landscap	Support	No specific reason given.	Seeks to retain as notified.
291.195	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-R11 Mining activities and/or quarrying activities (excluding existing farm quarries) withi	Support	Supports with modifications to protect existing quarrying and mining activities. [refer to original submission]	Seeks to amend as follows: Mining activities and/or quarrying activities (excluding existing ~~farm quarries~~quarrying activity) within or on Significant Natural Features or Rural Scenic Landscapes

						[refer to original submission for full relief sought]
291.196	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-R12 Mining activities and/or quarrying activities (excluding existing farm quarries) on or	Support	Supports with modifications to protect existing quarrying and mining activities. [refer to original submission]	Seeks to amend as follows: Mining activities and/or quarrying activities (excluding existing ~~farm quarries~~quarrying activity) within or on Significant Natural Features or Rural Scenic Landscapes [refer to original submission for full relief sought]
291.197	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-R13 Intensive indoor primary production and intensive outdoor primary production within or	Amend	Opposes in part and considers restricted discretionary status is more appropriate instead of non-complying as parts of the RSL may be appropriate, particularly where land is already irrigated and developed.	Seeks to amend NFL-R13 from non-complying activity status to restricted discretionary with the matters of discretion being the same as NFL-R10.
291.198	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-R14 Plantation Forestry on or within Outstanding Natural Features or Landscapes All	Support	No specific reason given.	Seeks to retain as notified.
291.199	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-R15 Planting species that can result in wilding conifers on or within Outstanding Natural	Support	No specific reason given.	Seeks to retain as notified.
291.200	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-R16 Intensive indoor primary production and intensive outdoor primary production on or wit	Support	No specific reason given.	Seeks to retain as notified.
291.201	Peter and Janine Stackhouse	Natural Features and Landscapes	NFL-S1 Standards for colours of buildings and structures in landscapes Buildings and st	Support	No specific reason given.	Seeks to retain as notified.
291.202	Peter and Janine Stackhouse	Public Access	PA-O1 Public and customary access Public and customary access is protected, maintained,	Support	No specific reason given.	Seeks to retain as notified.
291.203	Peter and Janine Stackhouse	Public Access	PA-O2 Provision of public access minimises adverse effects Public access to and along t	Support	No specific reason given.	Seeks to retain as notified.
291.204	Peter and Janine Stackhouse	Public Access	PA-P1 Activities that protect and maintain public and customary access Enable activitie	Support	No specific reason given.	Seeks to retain as notified.
291.205	Peter and Janine Stackhouse	Public Access	PA-P2 Mechanisms for improving public access Protect, maintain and enhance public acces	Oppose	Opposes in part the policy encouraging public access opportunities in land use applications but considers it is too ambiguous without rules and could pressure applicants and	Seeks to amend as follows: Protect, maintain and enhance public access by: ~~1. encouraging opportunities and mechanisms to maintain and~~

					suggests limiting to esplanade reserves/strips where appropriate through a subdivision process.	~~enhance public access when a land use application provides an opportunity for access; and~~ ~~2~~.1. requiring the creation of esplanade reserves and esplanade strips where appropriate in accordance with the Subdivision Chapter, ~~with priority given~~along the waterways listed in SCHED11 – Priority Areas for Public Access and Esplanade Strips, and lakes larger than 8 hectares.
291.206	Peter and Janine Stackhouse	Public Access	PA-P3 Consideration of adverse effects on public access When considering any applicatio	Support	Supports the policy but considers it should apply only to public land, not private land.	Seeks to amend as follows: When considering any application for resource consents, have regard to any adverse effects of the proposed activity on public access routes and access points on public land.
291.207	Peter and Janine Stackhouse	Activities on the Surface of Water	General	Support	General support for the chapter.	Seeks to retain as notified - except for submission points that follow.
291.208	Peter and Janine Stackhouse	Activities on the Surface of Water	ASW-P2 Commercial activities Provide for commercial surface water activities where it can	Support	Supports the policy for commercial activities on water, with a request to redefine 'commercial activities' as submitted in the definitions chapter.	Seeks to redefine 'commercial activities' as submitted.
291.209	Peter and Janine Stackhouse	Activities on the Surface of Water	ASW-R1 Use of vessels for a recreational activity All zones Activity status: Permitted	Amend	Considers that prescribed noise limits for vessels may create reverse sensitivity for recreational lake use as houses are built nearby and suggests protecting existing uses.	Seeks to amend as follows: PER-2 The following noise limits are not exceeded at a notional boundary established prior to 1st March 2025:
291.210	Peter and Janine Stackhouse	Light	General	Support	Support for the chapter.	Seeks to retain as notified.
291.211	Peter and Janine Stackhouse	Noise	General	Support	No specific reasons given	Retain as notified
291.212	Peter and Janine Stackhouse	Signs	General	Support	General support for the chapter.	Seeks to retain as notified except for the submission points that follow.
291.213	Peter and Janine Stackhouse	Signs	SIGN-R7 Signs attached to a trailer, vehicle or vessel All zones Activity status: Non	Amend	Considers that the rule controlling signs on vehicles/trailers is ambiguous and may cause arbitrary decision-making and suggests clarifying exemptions for company vehicles and business operations.	Seeks to amend as follows: This rule does not apply to: 1.~~an advertising~~sign painted or adhered directly onto company/fleet vehicles or trailers ~~which is incidental to the primary use of that vehicle or trailer~~; or 2. an advertising sign painted or adhered directly onto company/fleet vehicles or trailers ~~which are used in the day-to-day operation of that business;~~ or 3. businesses operating from a vehicle. ~~truck or caravan such as food vendors.~~

291.214	Peter and Janine Stackhouse	Temporary Activities	General	Support	Support for chapter with modification to remove the word 'light' from 'light aircraft' as this is not defined. Also refer to submission point on definitions chapter related to 'temporary activities'.	Seeks to replace ‘helicopter’ and ‘light aircraft’ with ‘aircraft' throughout the chapter.
291.215	Peter and Janine Stackhouse	Temporary Activities	TEMP-R6 Temporary helicopter and light aircraft take-offs and landings, excluding Ōamaru Airpo	Support	Considers that 'helicopter' is not a defined term and should be replaced with 'aircraft' [refer to submission point on definitions chapter related to 'temporary activities']	Seeks to replace ‘helicopter’ and ‘light aircraft’ with ‘aircraft' throughout the chapter.
291.216	Peter and Janine Stackhouse	General Rural Zone	GRUZ-O1 Purpose of the General Rural Zone The General Rural Zone provides for primary p	Support	Support the purpose of the general rural zone for primary production and that the rural zone provides vital socio-economic benefits to the District.	Retain as notified
291.217	Peter and Janine Stackhouse	General Rural Zone	GRUZ-O2 Character of the General Rural Zone The character of the General Rural Zone rem	Support	Support while recognising that odours are managed by the regional council. Support that primary production contributes to open character and maintenance of rural landscapes, and that a degree of built form is necessary to support the ongoing productivity of the rural zone.	Retain as notified
291.218	Peter and Janine Stackhouse	General Rural Zone	GRUZ-O3 Highly productive land The value and long-term benefits of using highly product	Support	Support - managing highly productive land is important to retain and support primary production in the rural environment, particularly where land is identified as being highly productive.	Retain as notified
291.219	Peter and Janine Stackhouse	General Rural Zone	GRUZ-O4 Rural amenity values A range of activities anticipated in the General Rural Zon	Support	Support for objective but considers there should be clearer guidance or a definition of rural amenity values.	Seeks to define 'rural amenity values' as follows: include open space, primary production, low population and building density, pastoral and arable character interspersed with indigenous biodiversity, relative quietness compared to urban areas, and connection to land for cultural, recreational and historic reasons.
291.220	Peter and Janine Stackhouse	General Rural Zone	GRUZ-O5 Business development in rural areas Rural areas are retained for primary produc	Support	Support - recognition is important for enabling appropriate rural-based business activities that complement the zone’s purpose.	Retain as notified
291.221	Peter and Janine Stackhouse	General Rural Zone	GRUZ-P1 Protection of highly productive land Protect highly productive land for use by	Support	Support - important that identified highly productive land is protected for primary production.	Retain as notified
291.222	Peter and Janine Stackhouse	General Rural Zone	GRUZ-P2 Development in the General Rural Zone Maintain the rural character in the Gener	Support	Support for intent to maintain rural character while allowing flexibility for ancillary activities and existing uses, encouraging appropriate indigenous planting, and enabling quality staff housing and additional dwellings and recognising the diverse residential needs of rural operations without compromising housing standards.	Seeks to amend as follows: ... 4. encouraging the maintenance and enhancement of existing, and the planting of new, indigenous vegetation where appropriate; and 5. providing for conservation activities; and 6. recognising and providing for lawfully established rural activities and minimising reverse sensitivity effects on primary production and ancillary activities of new development in the General Rural

						Zone; and 7. providing for a ~~single~~ minor residential unit on sites to facilitate residential choice and flexibility ~~while ensuring that the minor residential unit is subservient to the principal residential unit on the site.~~ 8. providing for multiple residential units on large sites to facilitate staff accommodation while ensuring building density is appropriate for the General Rural Zone.
291.223	Peter and Janine Stackhouse	General Rural Zone	GRUZ-P3 Design of development in rural areas Ensure that new development is well design	Support	Support for intent to ensure new development is appropriate for the environment and buildings and structures are necessary to support primary production.	Retain as notified
291.224	Peter and Janine Stackhouse	General Rural Zone	GRUZ-P4 Maintenance of clear urban, rural lifestyle and rural areas Maintain a clear di	Support	Support intent where there is a distinguishment of urban and rural environments but encourage flexibility for primary production activities on the rural fringe where adverse effects can be appropriately managed.	Seeks to amend as follows: Maintain a clear distinction between urban, rural lifestyle and rural areas through the use of clear land use zones and avoidance of ad-hoc subdivision where growth to Settlement or Rural Lifestyle zones has not been planned for unless the adverse effects can be avoided, remedied or mitigated.
291.225	Peter and Janine Stackhouse	General Rural Zone	GRUZ-P5 Intensive primary production Provide for intensive indoor primary production an	Support	Support as important that provision is made for intensive primary production in the rural zone where effects can be appropriately managed.	Retain as notified
291.226	Peter and Janine Stackhouse	General Rural Zone	GRUZ-P6 Integration of primary production with natural and cultural values Recognise th	Support	Support but seeks clarification that sensitive values do not apply across the entire GRUZ zone and recommend limiting specialist reports to identified overlays, and advocate for enabling new primary production activities.	Seeks to amend as follows: Recognise the importance of the identified landscape, heritage, biodiversity and mana whenua values and provide for continued and new primary production in these areas while avoiding, remedying or mitigating any adverse effects on the values.
291.227	Peter and Janine Stackhouse	General Rural Zone	GRUZ-P7 Intensive primary production and extractive industries in close proximity to settlemen	Support	Support intent that any new primary production and extractive industries avoid adverse effects on existing settlements.	Retain as notified
291.228	Peter and Janine Stackhouse	General Rural Zone	GRUZ-P8 Energy and resource efficiency Encourage minimisation of energy and water use a	Support	Support intent to promote energy and resource efficiency where appropriate, but notes that the Energy chapter lacks sufficient permissiveness to effectively implement the policy.	Seeks to amend as follows: Encourage minimisation of energy and water use and the use of low impact design such as optimal site layout, passive solar design, solar power and water heating, and greywater recycling for any new development, where appropriate.
291.229	Peter and Janine Stackhouse	General Rural Zone	GRUZ-P9 Outline Development Plans Provide for any substantial development extension of	Support	Support with clarification that recreational, heritage, and ecological values should be limited to those identified in the plan to avoid unnecessary reporting and suggest using covenants or separation distances to manage adverse effects on new dwellings near the General Rural Zone.	Seeks to amend as follows: ...

						c. retains and supports the relationship to, and where possible enhances, identified recreational, heritage and ecological features and values; and d. is coordinated with the delivery of appropriate infrastructure; and e. achieves a high level of amenity; and f. specifies covenants and/or provides a sufficient separation distance of habitable buildings with the General Rural Zone to minimise the potential for reverse sensitivity effects.
291.230	Peter and Janine Stackhouse	General Rural Zone	GRUZ-R1 Building activity General Rural Zone Activity status: Permitted Where: PER-	Support	Support rule to provide for building activity in the rural zone and default to restricted discretionary where compliance cannot be achieved.	Retain as notified
291.231	Peter and Janine Stackhouse	General Rural Zone	GRUZ-R2 Primary production (excluding carbon forestry otherwise provided for in GRUZ-R18, mini	Support	Support rule advocating for the protection of existing mining and quarrying activities in the General Rural Zone and affirm that primary production is appropriately located within this zone.	Seeksto amend as follows: Primary production (excluding carbon forestry otherwise provided for in GRUZ-R18, new mining activity, new quarrying activities, new intensive indoor primary production and new intensive outdoor primary production)
291.232	Peter and Janine Stackhouse	General Rural Zone	GRUZ-R3 Amenity planting and shelterbelts General Rural Zone Activity status: Permitt	Support	Support with amendments to clarify that PER-1 may overly restrict amenity planting due to broad pest species criteria, and that PER-2 should regulate actual effects rather than speculative ones.	Seeks to amend as follows: PER-1 The amenity planting or shelterbelt does not involve planting of species that are, ~~or can become~~, pest species as identified in any Regional Pest Management Plan; and PER-2 The amenity planting ~~will~~does not shade any existing adjoining residential unit between the hours of 9:00am and 4:00pm, or any formed public road between 10:00am and 2:00pm, on the shortest day of the year; and...
291.233	Peter and Janine Stackhouse	General Rural Zone	GRUZ-R4 Residential activity General Rural Zone Activity status: Permitted Activity	Support	No specific reason given	Retain as notified
291.234	Peter and Janine Stackhouse	General Rural Zone	GRUZ-R5 Residential unit General Rural Zone Activity status: Permitted Where: PER-1	Support	No specific reason given	Retain as notified
291.235	Peter and Janine Stackhouse	General Rural Zone	GRUZ-R6 Accessory building General Rural Zone Activity status: Permitted Activity s	Support	No specific reason given	Retain as notified
291.236	Peter and Janine Stackhouse	General Rural Zone	GRUZ-R7 Minor residential unit General Rural Zone Activity status: Permitted Where:	Support	Support in part, recommending it apply only to smaller sites, with staff housing for larger farms permitted through other provisions to ensure adequate and appropriate accommodation for rural workers.	Retain as notified

291.237	Peter and Janine Stackhouse	General Rural Zone	GRUZ-R8 Visitor accommodation General Rural Zone Activity status: Permitted Where:	Support	Support but recommend amending the five-person limit to better reflect actual building capacity and accommodate larger groups, such as tour parties, where adverse effects can be appropriately managed.	Seeks to amend as follows: PER-1 The visitor accommodation is limited to homestays accommodating no more than ~~5~~10 visitors at any one time; and
291.238	Peter and Janine Stackhouse	General Rural Zone	GRUZ-R9 Home business (excluding primary production activity) General Rural Zone Acti	Support	Support for enabling employment and entrepreneurialism in the rural zone, noting that effects like noise and visual impact are typically well managed through existing provisions, and recommend flexibility for outdoor storage and activities, with screening requirements clearly defined and not overly restrictive.	Seeks to amend as follows: ~~PER-1~~ ~~No more than 40m2 of the gross floor area of all buildings on the site is used for the home business; and~~ ~~PER-2~~PER-1 No more than one full time employee, or equivalent, ~~engaged in~~ working at the site of the home business, resides off-site; and ~~PER-3~~PER-2 No more than 2 heavy vehicle movements, and a total of 20 vehicle movements are generated in a 24-hour period for the home business; and ~~PER-4~~PER-3 Any on-site storage of materials associated with the home business is undertaken within buildings on the site, or is screened to a height of at least 1.2m from adjoining roads and sites; and ~~PER-5~~PER-4 The manufacturing, altering, repairing, dismantling or processing of any goods, or articles associated with the home business, take place within a building or is screened to a height of at least 1.2m from adjoining roads and sites.
291.239	Peter and Janine Stackhouse	General Rural Zone	GRUZ-R10 Intensive indoor primary production and intensive outdoor primary production G	Support	Support with modifications to avoid duplication of effluent consent requirements already managed by the Regional Council, and recommend aligning any remaining provisions with Regional Council's 150m notification threshold.	Seeks to amend as follows: PER-2 1. housed pigs are located no closer than 500m to a property boundary; and ~~2. no disposal or storage of effluent within 500m of a residential unit on any other site; and~~ 3. no intensive indoor primary production or intensive outdoor primary production of pigs occurs within ~~2 kilometres~~150m of a Residential, Settlement, or Open Space Zone; or PER-3 ... ~~2. no disposal or storage of effluent within 500m of a residential unit on any other site; and~~ 3. no intensive indoor primary production or intensive outdoor

						primary production of poultry occurs within ~~2 kilometres~~150m of a Residential, Settlement or Open Space Zone; or PER-4 For intensive indoor primary production or intensive outdoor primary production of any other species, there is: ~~1. no disposal or storage of effluent within 500m of a residential unit on any other site; and~~ 2. a setback of at least ~~2 kilometres~~ 150m from a Residential, Settlement or Open Space Zone.
291.240	Peter and Janine Stackhouse	General Rural Zone	GRUZ-R11 Recreational activity General Rural Zone Activity status: Permitted Activi	Support	No specific reasons given	Retain as notified
291.241	Peter and Janine Stackhouse	General Rural Zone	GRUZ-R12 Flood protection structures General Rural Zone Activity status: Permitted	Support	No specific reasons given	Retain as notified
291.242	Peter and Janine Stackhouse	General Rural Zone	GRUZ-R13 Conservation activities General Rural Zone Activity status: Permitted Acti	Support	No specific reasons given	Retain as notified
291.243	Peter and Janine Stackhouse	General Rural Zone	GRUZ-R14 Commercial activity General Rural Zone Activity status: Permitted Where: P	Support	Support with amendments to allow farm shops to sell a broader range of locally produced primary goods, ideally within a 100km radius, while maintaining rural character and avoiding expansion into general retail.	Seeks to amend as follows: PER-1 Retail sales are limited to: 1. food sourced from primary production activities within a 100km radius of the site ~~farming produce (including milk, fruit, vegetables, plants, flowers, or eggs) produced on the site, or honey processed on the site; or~~
291.244	Peter and Janine Stackhouse	General Rural Zone	GRUZ-R15 Aeroplane airstrips and helicopter landing areas, and the use of these by aircraft	Oppose	Considers that the aircraft movement limit should be increased to 32 per month for flexibility, and that no limit should apply where sufficient setbacks ensure there are no adverse effects at the nearest boundary.	Seeks to amend as follows: PER-3 The use of the landing area or airstrip is for any other activity which results in no more than ~~8 aircraft movements per week (4 take-offs and 4 landings)~~32aircraftmovements per month; or PER-4 The airstrip is more than 1,000m from the nearest notional boundary under different ownership; or ...
291.245	Peter and Janine Stackhouse	General Rural Zone	GRUZ-R16 Papakāika within land held under Te Ture Whenua Māori Act 1993 or within a Native Res	Support	No specific reasons given	Retain as notified
291.246	Peter and Janine Stackhouse	General Rural Zone	GRUZ-R17 Seasonal Worker accommodation General	Oppose	Supports the need for seasonal worker housing but oppose limitations that encourage sub-standard accommodation,	Seeks to amend as follows:

			Rural Zone Activity status: Permit		advocating instead for flexible, self-contained, and higher-quality options that respect the dignity and needs of workers.	PER-1 The minor residential unit or building ~~and/or any campsite~~is only to be used by workers employed on the site; and PER-2 The seasonal worker accommodation islocatedon a site that is a minimum of 20ha; and ~~PER-3~~ ~~Any building is relocatable or able to be reconfigured to a building accessory to land-based primary production; and~~ ~~PER-4~~ ~~Any seasonal worker accommodation contains no more than one kitchen facility; and~~ PER-5 ~~Any building used for seasonal worker accommodation is no more than 125m2 gross floor area; and~~ PER-6 Any building used for seasonal worker accommodation provides for a maximum of 10 occupants; and ~~PER-7~~ ~~The maximum area used for camping as part of any seasonal worker accommodation shall be 1000m2 and be located at least 100m from any residential unit on an adjoining site.~~
291.247	Peter and Janine Stackhouse	General Rural Zone	GRUZ-R18 Carbon forestry General Rural Zone Activity status: Permitted Where: PER-1	Support	Support with modifications to permit suitable indigenous species for carbon forestry, align setback rules with biodiversity provisions, correct wording around pest species, and remove unnecessary restrictions that conflict with broader plan objectives to enhance native biodiversity.	Seeks to amend as follows: PER-1 The species of planting are indigenous~~ to the ecological district in which the activity is to take place~~; and ... PER-4 ~~4. within 10m of a Significant Natural Area; and~~ PER-5 The carbon forestry activity ~~does not involve the planting~~avoids an increase in scale or intensity of any pest, pest agent, or organism of interest identified in the relevant Regional Pest Management Plan; and ~~PER-6~~ ~~The carbon forestry utilises no more than 50% of any site.~~

291.248	Peter and Janine Stackhouse	General Rural Zone	GRUZ-R19 Rural Industry General Rural Zone Activity status: Restricted Discretion	Support	Support with more permissive settings to reflect the functional and operational needs of rural industries, noting that site design and infrastructure are developer decisions and that adverse effects are already managed through other chapters in the plan.	Seeks to amend as follows: Activity status: ~~Restricted Discretionary~~Permitted Where: PER-1 The activity is not a potentially high-impact industrial activity. Note: consent may be required under the Transport chapter. ~~Matters of discretion are restricted to:~~ ~~1. the suitability of the location, site design and layout; and~~ ~~2. the intensity and scale of the activity; and3. the extent of adverse effects on existing or permitted activities; and~~ ~~4. the extent of adverse effects on the safe and efficient operation of the road network, and suitability of onsite loading, manoeuvring and access; and~~ ~~5. the provision of infrastructure to service the activity.~~
291.249	Peter and Janine Stackhouse	General Rural Zone	GRUZ-R20 Papakāika where not otherwise provided for under GRUZ-R16 General Rural Zone	Support	No specific reasons given	Retain as notified
291.250	Peter and Janine Stackhouse	General Rural Zone	GRUZ-R21 Community facility General Rural Zone Activity status: Discretionary Activ	Support	No specific reasons given	Retain as notified
291.251	Peter and Janine Stackhouse	General Rural Zone	GRUZ-R22 Industrial activity General Rural Zone Activity status: Discretionary Acti	Support	No specific reasons given	Retain as notified
291.252	Peter and Janine Stackhouse	General Rural Zone	GRUZ-R23 Any other activity not provided for as a permitted, restricted discretionary, non-com	Support	No specific reasons given	Retain as notified
291.253	Peter and Janine Stackhouse	General Rural Zone	GRUZ-R24 Retirement village General Rural Zone Activity status: Non-Complying Activ	Support	No specific reasons given	Retain as notified
291.254	Peter and Janine Stackhouse	General Rural Zone	GRUZ-R25 Educational facility General Rural Zone Activity status: Non-Complying Act	Oppose	Opposes the non-complying activity status for schools in rural zones and considers that their rural character typically minimises reverse sensitivity risks and that access to education should be balanced with protecting primary production.	Seeks to amend the activity to a permitted activity with appropriate setbacks for buildings for the educational facility or restricted discretionary.
291.255	Peter and Janine Stackhouse	General Rural Zone	GRUZ-S1 Residential site density The maximum density of residential units on any site	Support	No specific reasons given	Retain as notified

291.256	Peter and Janine Stackhouse	General Rural Zone	GRUZ-S2 Maximum height All building and structures must not exceed a maximum height of	Support	Support GRUZ-S2 with amendment to reflect that grain silos can be up to 25m in height.	Seeks to amend as follows: 1. All building and structures must not exceed a maximum height of: ... 2. ~~15m~~25m for grain silos; ...
291.257	Peter and Janine Stackhouse	General Rural Zone	GRUZ-S3 Building coverage The building coverage for any site shall not exceed 20%. Rai	Support	No specific reasons given	Retain as notified
291.258	Peter and Janine Stackhouse	General Rural Zone	GRUZ-S4 Road and rail setbacks A stock loading ramp or race with its entry/exit point	Support	Support with modification to allow stock loading ramps angled to the road, provided there is at least 30m of space to accommodate full off-road parking and maneuvering.	Seeks to amend as follows: 1. A stock loading ramp or race with its entry/exit point located facing a road, including a State Highway, shall not be located within ~~a~~30m ~~setback~~ from the road boundary in the direction the loading ramp faces. 2. A stock loading ramp or race with its entry/exit point running parallel or away from ~~to~~ the road is exempt from this standard.
291.259	Peter and Janine Stackhouse	General Rural Zone	GRUZ-S5 Internal boundary setbacks The minimum setback of any part of a building or str	Support	No specific reason given	Retain as notified
291.260	Peter and Janine Stackhouse	General Rural Zone	GRUZ-S6 Frontage fencing Any fencing within a road boundary setback or internal bounda	Support	Support with modification to exempt the curtilage of residential and minor residential units, allowing more residential-style fencing around homes while retaining appropriate rural fencing elsewhere in the zone.	Seeks to amend as follows: 1. Any fencing within a road boundary setback or internal boundary setback shall be post and netting, post and wire, or post and rail fencing. 2. Fencing of residential units and minor residential units is exempt from this standard.
291.261	Peter and Janine Stackhouse	General Rural Zone	GRUZ-S7 Crop protection structures Dark green or black cloth is used for all vertical	Amend	Considers there should be justification for colour and size restrictions.	Seeks to delete or provide evidence or justification for colour and size restrictions.
291.262	Peter and Janine Stackhouse	General Rural Zone	GRUZ-S8 Hours of operation Any activity (other than a residential activity or visitor	Support	Support intent to limit hours for rural amenity protection but considers the matters of discretion should also address potential reverse sensitivity effects on primary production activities.	Seeks to amend as follows: Matters of discretion are restricted to: ... 2. any adverse effects on the amenity values of properties on any adjoining residential sites; and 3. any reverse sensitivity effects on primary production.
291.263	Peter and Janine Stackhouse	General Rural Zone	GRUZ-S9 Servicing and firefighting water supply and access All new buildings must be c	Oppose	Oppose in part, supporting its intent to ensure buildings are appropriately serviced but recommending flexibility for farm and accessory buildings that do not require reticulated services to avoid unrealistic expectations.	Seeks to amend as follows: 1. All new residential buildings must be connected to reticulated services where these are available; and 2. All new residential buildings must comply with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PA

						4509:2008 unless written approval is provided from Fire and Emergency New Zealand regarding an alternative firefighting water supply.
291.264	Peter and Janine Stackhouse	Transport	TRAN-O1 On-site transport facilities and access Use and development has safe and effective	Support	No specific reason given	Retain as notified
291.265	Peter and Janine Stackhouse	Transport	TRAN-O2 High trip generating use and development The safety and efficiency of the transpor	Support	No specific reason given	Retain as notified
291.266	Peter and Janine Stackhouse	Transport	TRAN-O3 Transport network The transport network is effective, accessible and integrated	Support	No specific reason given.	Seeks to retain as notified.
291.267	Peter and Janine Stackhouse	Transport	TRAN-P1 High trip generating use and development Provide for high vehicle trip generato	Support	Support with modification to clarify the term 'surrounding area' in Point 5, as it is currently vague and may lead to inconsistent interpretation.	Seeks to amend as follows: ... 5. the effect of the proposed activity on the character and amenity values of the surrounding ~~area~~adjoining sites; and ...
291.268	Peter and Janine Stackhouse	Transport	TRAN-P2 Appropriate on-site transport facilities Enable on-site transport facilities where	Oppose	Opposes the policy as it addresses only on-site effects and considers that internal site use is typically managed by landowners and industry standards, and that provisions should focus on impacts beyond the site to align with TRAN-O1 and avoid unnecessary safety risks.	Seeks to amend as follows: Enable on-site transport facilities where these: 1. meet industry standards; and 2. are of a location and design that provides for: a. public health and safety; and ~~b. the safe and efficient use of the site; and~~ c. the safe and efficient functioning of the transport network; and d. the reasonable loading and access demands generated by the use of the site; and e. the safe and effective access for firefighting purposes. ~~3. promote the uptake and use of the active transport network.~~
291.269	Peter and Janine Stackhouse	Transport	TRAN-P3 Potentially appropriate on-site transport facilities Only allow for on-site tra	Oppose	Considers the policy unnecessary as relevant matters are already addressed unless they regulate internal effects. Considers it should focus solely on firefighting access and remove provisions targeting off-site effects.	Amend as follows: Only allow for on-site transport facilities that do not meet industry standards where it can be demonstrated, if applicable, that: ~~1. the design is in response to site and/or topographical constraints; and~~
291.270	Peter and Janine Stackhouse	Transport	TRAN-P4 Vehicle crossings Provide for safe and efficient	Support	Support to the extent that it applies to new vehicle crossings.	Seeks to amend as follows:

			connections between the transp			Provide for safe and efficient connections between the transport network and on-site transport facilities by requiring new vehicle crossings to roads to address: ...
291.271	Peter and Janine Stackhouse	Transport	TRAN-P5 Regionally Significant Infrastructure Recognise the social, economic, cultural	Support	Support, particularly the definition of Regionally Significant Infrastructure.	Retain as notified
291.272	Peter and Janine Stackhouse	Transport	TRAN-P6 Multi-modal and active transport Encourage activities to incorporate opportunitie	Oppose	Considers to be overly strong in wording and that cycling/pedestrian modes are more hazardous and should not be encouraged where full cycling infrastructure is not available.	Seeks to amend as follows: ~~Encourage~~Promote activities to incorporate opportunities for multi-modal and active transport, including cycle parking and end of trip facilities if the site is served by the active transport network where it separates cyclists and pedestrians.
291.273	Peter and Janine Stackhouse	Transport	TRAN-P8 Upgrading of the transport network Provide for the upgrading or development of	Support	Considers clearer guidance needed on when to respond to earthworks effects, suggesting the policy be limited to landscape and ecological values identified in overlays and chapters of the plan.	Seeks to amend as follows: ... 8. responds to site and topographical constraints including opportunities to reduce the effects of earthworks on identified landscape and ecological values; ...
291.274	Peter and Janine Stackhouse	Transport	TRAN-P9 Roads as infrastructure corridors Encourage the use of roads as infrastructure	Support	No specific reason given	Retain as notified
291.275	Peter and Janine Stackhouse	Transport	TRAN-P10 Road classification Classify roads according to their function and anticipated	Support	No specific reason given	Retain as notified
291.276	Peter and Janine Stackhouse	Transport	General	Oppose	Considers that rural zones should be exempt from policies that may pressure developers to fund cycle and footpaths where they offer no practical benefit and seeks clarification that policies apply only to new activities, noting that technical evidence from the WDC roading department is needed to support provisions for road crossings.	Seeks to have submission points considered across all TRAN provisions and for the roading department to reply to this submission at further hearings commenting on the TRAN chapter overall.
291.277	Peter and Janine Stackhouse	Transport	TRAN-R1 Vehicle crossings onto roads All zones Activity status: Permitted Where: PE	Support	Support for new vehicle crossings subject to submission point*298.276*. [*list previous submission point #]	Seeks to amend as follows: TRAN-R1 New Vehicle crossings onto roads
291.278	Peter and Janine Stackhouse	Transport	TRAN-R2 Site access for activities without any on-site	Support	Support with modifications to clarify that pedestrian and cycling access requirements should not apply in zones where vehicle travel is operationally necessary, such as due to distance.	Seeks to amend as follows:

			vehicle parking space or loading spaces			TRAN-R2 Site access for new activities without any on-site vehicle parking space or loading spaces PER-1 All of the following standards are complied with where relevant: 1. TRAN-S1 Pedestrian and cycling access in Residential Zones; 2. TRAN-S2 Firefighting access
291.279	Peter and Janine Stackhouse	Transport	TRAN-R3 On-site parking, loading, and access All zones Activity status: Permitted W	Oppose	Considers the provision overregulates internal site effects unrelated to the transport network, particularly dairy lanes and private access already covered under TRAN-S3, and finds TRAN-S5 overly restrictive by limiting vehicle standing, queuing, and manoeuvring within a site that are inherent and internal and should not be subject to standards.	SeekstodeleteTRAN-S7 and TRAN-S8 from the rule.
291.280	Peter and Janine Stackhouse	Transport	TRAN-S9 Accessible parking spaces Where parking spaces are provided on site: any on-si	Support	Support subject to submissions from disability advocate organisations, particularly with reference to rural sites.	Retain as notified
291.281	Peter and Janine Stackhouse	Transport	TRAN-S10 Design requirements for on-site vehicle parking spaces Where parking spaces ar	Oppose	Considers the managing of internal site effects inconsistent with TRAN-O1 and recommends it be amended to clarify that it does not apply to rural or residential zones.	Seeks to provide clarification that the standard does not apply to rural and residential zones.
291.282	Peter and Janine Stackhouse	Transport	TRAN-S11 Surface of parking and loading areas The surface of all parking and loading a	Oppose	Considers that setting a low car park threshold would place undue burden on rural zones, and that regulating internal site effects is inconsistent with TRAN-O1.	Seeks to provide clarification that the standard does not apply to rural and residential zones.
291.283	Peter and Janine Stackhouse	Transport	TRAN-S12 On-site cycle parking All developments, excluding residential units and prima	Amend	Considers that while TRAN-S12 excludes primary production, it should also exclude rural zones due to long travel distances and lack of separated cycleways, noting that many related standards are similarly irrelevant in rural contexts.	Seeks to provide clarification that the standard does not apply to rural zones.
291.284	Peter and Janine Stackhouse	Transport	TRAN-S12 On-site cycle parking All developments, excluding residential units and prima	Oppose	Considers standard to be overly prescriptive regarding the standard of cycle parking.	Seeks to provide clarification that the standard does not apply to rural and residential zones
291.285	Peter and Janine Stackhouse	Transport	TRAN-R3 On-site parking, loading, and access All zones Activity status: Permitted W	Oppose	Opposes incorporating Australian and New Zealand Standards by reference in the district plan due to their cost, copyright restrictions, external review processes, and inefficiency and considers the PDP should include locally specified standards to avoid financial barriers and regulatory outsourcing.	Seeks to use standards acceptable to the WDC roading department which are written into the plan to be freely available. Delete TRAN-R3. Alternatively, if retained sees to amend as follows All zones except Rural Lifestyle Zone, General Rural Zone, Macraes Mining Zone and Settlement Zone. PER-1 All of the following standards are complied with where relevant; 1. TRAN-S2 Firefighting access;

						~~2. TRAN-S3 Service lanes, private ways, private roads, pedestrian accessways and walkways;~~ ~~3. TRAN-S4 Reverse manoeuvring;~~ ~~4. TRAN-S5 Design standards for vehicle manoeuvring areas;~~ 5. TRAN-S6 Service stations and truck stops; ~~6. TRAN-S7 On-site loading spaces for non-residential activities;~~ ~~7. TRAN-S8 Design requirements for loading and vehicle standing spaces;~~ 8. TRAN-S9 Accessible parking spaces; ~~9. TRAN-S10 Design requirements for on-site vehicle parking spaces;~~ ~~10. TRAN-S11 Surface of parking and loading areas;~~ ~~11. TRAN-S12 On-site cycle parking.~~ Matters of discretion are restricted to: 1. the matters of discretion listed in any of the standards TRAN-S2,~~TRAN-S3, TRAN-S4, TRAN-S5~~, TRAN-S6,~~TRAN-S7, TRAN-S8~~,TRAN-S9, ~~TRAN-S10, TRAN-S11, and/or TRAN-S12~~that are not complied with.
291.286	Peter and Janine Stackhouse	Transport	TRAN-R4 Vehicle trip generating activities All zones Activity status: Permitted Whe	Support	Supports with changes to reduce the consent threshold and controlling the activity directly by the number of traffic movements rather than using proxies like gross floor area.	Retain as notified with changes to Table 6 - High Trip Generator Thresholds.
291.287	Peter and Janine Stackhouse	Transport	TRAN-R5 Walkways, cycleways and shared paths which are located on public land other than a roa	Support	Support with amendment to replace the Austroads Guide with a specific standard to ensure oversight of future changes is under WDC control.	Seeks to retain as notified with changes to TRAN-S20.
291.288	Peter and Janine Stackhouse	Transport	TRAN-R6 Extensions and new vehicle access tracks ancillary to infrastructure, outside of any o	Support	Support with amendment to apply within overlays as extensive coverage of the Rural Scenic and Outstanding Natural Landscapes overlays makes it overly restrictive if excluded and considers infrastructure access should take precedence over overlay values without requiring consent or incurring additional costs.	Seeks to amend as follows: TRAN-R6 Extensions and new vehicle access tracks ancillary to infrastructure, ~~outside of any overlay~~
291.289	Peter and Janine Stackhouse	Transport	TRAN-S3 Service lanes, private ways, private roads, pedestrian accessways and walkways	Support	Support if restricted to public ways only and specifies a standard rather than requiring purchase of the standard.	Seeks to amend as follows: TRAN-S3 Service lanes, ~~private ways, private roads~~, pedestrian accessways and walkways on <u>public land.</u> 1. Service lanes, private ways, private roads, pedestrian accessways and walkways on <u>public land</u> must be designed and constructed in accordance with<u>[describe standards here]</u> ~~NZS 4404:2010 Land Development and Subdivision Infrastructure; except where Table 7 Minimum legal widths and formation requirements for private ways/vehicle access lots replaces the formation requirements of private ways for residential units detailed in NZS 4404:2010.~~

291.290	Peter and Janine Stackhouse	Transport	TRAN-S5 Design standards for vehicle manoeuvring areas Areas must be provided on a sit	Oppose	Considers the standard overly restrictive by requiring all vehicle standing, queuing, and manoeuvring to occur entirely within a site, including areas inherently used for such purposes, making on-street parking non-compliant and imposing internal site controls unrelated to TRAN-O1.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. Areas must be provided on a site for vehicles to stand, queue and make all necessary manoeuvres on site without using the road or State Highway, ~~and without~~using the area provided for parking space, servicing, loading space or outdoor storage ~~purposes~~; and ...Matters of discretion are restricted to: 1. the safety and movement of pedestrians, cyclists, public transport and general traffic on the road corridor.
291.291	Peter and Janine Stackhouse	Transport	TRAN-S7 On-site loading spaces for non-residential activities The number of loading sp	Oppose	Considers the standard inappropriate for rural contexts and that it imposes unnecessary discretion over loading needs bestdeterminedby the operator. Also considers that it relies on outdated and inaccessible standards and should instead include explicit provisions within the plan.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. The number of loading spaces for any non-residential activity must not be less than that shown in Table 8 – Minimum loading space requirements for non-residential activities below and must be provided on-site, except in the Town Centre Zone and rural zones. ... 3. Neither Clause 1 or 2 above apply to sites of less than 50m2 that are used for infrastructure purposes, or to primary production. Matters of discretion are restricted to: 1. the effective, efficient and safe operation of the transport network; and ~~2. the identified loading needs of the activity.~~
291.292	Peter and Janine Stackhouse	Transport	TRAN-S8 Design requirements for loading spaces and vehicle standing spaces Loading spa	Oppose	Considers the standard inappropriate for rural conditions and imposes unnecessary discretion over loading needs. Also considers the standard relies on outdated and inaccessible standards, and should instead include clear, explicit provisions within the plan.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. Loading spaces and vehicle standing spaces required under TRAN-S5 must be designed, constructed and maintained in accordance with [produce a specific standard in the text here].~~AS 2890.2.2002 Parking facilities Part 2: Off-street commercial vehicle facilities, for the specified minimum design vehicle.~~ Matters of discretion are restricted to: 1. the effective, efficient and safe operation of the transport network; and ~~2. the identified loading and vehicle space needs of the activity.~~

291.293	Peter and Janine Stackhouse	Transport	TRAN-S9 Accessible parking spaces Where parking spaces are provided on site: any on-si	Support	Support subject to submission(s) from disability advocate organisations, particularly regarding application to rural zones.	Seeks to retain with any amendments requested by disability advocate organisations and disabled people.
291.294	Peter and Janine Stackhouse	Transport	TRAN-S10 Design requirements for on-site vehicle parking spaces Where parking spaces ar	Oppose	Considers the standard imposes design requirements that are unclear or unsuitable for rural and residential contexts and regulates internal site effects inconsistent with TRAN-O1.	Seeks to amend as follows: Where parking spaces are provided on a site: 1. car parking must comply with the requirements of [provide standard here]~~AS 2890.1:2004 Parking facilities Part 1: Off-street car parking,~~except for: a. a parking space in a garage or carport; or b. staff parking that is provided as stacked parking of no more than two vehicles, or c. parking for residential or primary production activity.
291.295	Peter and Janine Stackhouse	Transport	TRAN-S11 Surface of parking and loading areas The surface of all parking and loading a	Oppose	Considers the standard imposes unnecessarily low thresholds and surface requirements on parking and loading areas in rural and residential zones, regulates internal site effects inconsistent with TRAN-O1, and conflicts with permitted pathways for multiple residential units.	Seeks to delete or include as advice note. Alternatively, seeks to amend as follows: 1. The surface of ~~all~~parking and loading areas must either be: ... 2. Clause 1 does not apply where a site contains parking for one residential units or primary production activity.
291.296	Peter and Janine Stackhouse	Transport	TRAN-S12 On-site cycle parking All developments, excluding residential units and prima	Oppose	Considers the standard inappropriately applies cycle parking requirements in rural areas where cycling is impractical and potentially unsafe and is overly prescriptive in its design standards.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. All developments, excluding residential units and primary production, ~~must~~should provide cycle parking at a rate of 1 cycle parking for every 10 car parking spaces provided; and 2. cycle parking ~~must~~should meet the following minimum specifications: a. cycle parking facilities ~~must~~ should be: i. signposted or visible to cyclists entering the site; and ~~ii. located as close as possible to, and no more than 15m from at least one main pedestrian public entrance to the building/activity; and~~ iii. located so they do not impede pedestrian thoroughfares, including areas used by people whose mobility or vision is restricted; and iv. clear of vehicle parking or manoeuvring areas; ~~b. cycle parking facilities must be available during the activity's hours of operation and must not be impeded by any structure, storage of goods, landscape planting or other use; and~~ ~~c. long stay cycle parking facilities (for staff or residents) must be located:~~ ~~i. in a covered area; and~~ ~~ii. in an area where access by the general public is generally excluded.~~

						~~Note: Refer to the Austroads Bicycle Parking Facilities: Guidelines for design and installation: October 2-16 (AP-R527-16).~~ Matters of discretion are restricted to: ... 4. whether cycling is a safe method of transport to the site.
291.297	Peter and Janine Stackhouse	Transport	TRAN-S13 Width and number of vehicle crossings onto roads Every lot with direct vehicl	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
291.298	Peter and Janine Stackhouse	Transport	TRAN-S14 Formation and sealing of vehicle crossings All vehicle crossings onto a seale	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
291.299	Peter and Janine Stackhouse	Transport	TRAN-S15 Distance between vehicle crossings and road intersections the distance betwee	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
291.300	Peter and Janine Stackhouse	Transport	TRAN-S16 Sight distances from vehicle crossings Any vehicle crossing onto a road other	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
291.301	Peter and Janine Stackhouse	Transport	Table 6 – High trip generator thresholds	Support	Supports the thresholds with modification to raise the lower limits, as considers there is no technical evidence supporting the current thresholds and managing effects through vehicle movements is moreappropriate. Also considers that valuable services such as emergency, healthcare, education, recreation, and community facilities should be given higher permitted thresholds to reduce consent barriers and better reflect their social importance.	Seeks to incorporate management of the effects from publicly owned or funded educational facilities managed by TRAN-R8 when a road need upgraded to meet effects from an exceeded threshold. [refer to original submission for full relief sought]
291.302	Peter and Janine Stackhouse	Transport	Table 7 – Minimum legal widths and formation requirements for private ways/access lots	Oppose	Considers the table unnecessarily duplicates TRAN-S2 by applying minimum legal widths and formation requirements to private ways, manages only internal site effects, and relies on inaccessible standards without supporting technical evidence.	Seeks to amend as follows: Table 7 – Minimum legal widths and formation requirements for ~~private ways/~~access lots
291.303	Peter and Janine Stackhouse	Energy	General	Oppose	Considers that the chapter does not adequately reflect the benefits and low environmental impact of renewable energy and places excessive consent burdens on activities that should be encouraged, especially those generating electricity at the point of consumption to reduce demand on large-scale infrastructure.	Seeks for the chapter to reflect the benefits and low environmental impact of renewable energy and to reduce consent burdens on these activities [inferred relief requested].
291.304	Peter and Janine Stackhouse	Energy	ENG-O1 Recognising the benefits of renewable electricity generation The significant local,	Support	No specific reasons given	Retain as notified

291.305	Peter and Janine Stackhouse	Energy	ENG-O2 Design and location of renewable electricity generation Renewable electricity ge	Support	No specific reasons given	Retain as notified
291.306	Peter and Janine Stackhouse	Energy	ENG-O3 Protecting the values and qualities of any overlay Waitaki District's overlays a	Oppose	Considers that not all overlays are equal and not all renewable energy methods are equal.	Seeks to amend as follows: ENG-O3 Protecting the values and qualities of ~~any~~ overlay Waitaki District's overlays are protected as far as practicable from ~~the~~any significant adverse effects of renewable electricity generation activities.
291.307	Peter and Janine Stackhouse	Energy	ENG-P1 Recognising the benefits of renewable electricity generation Recognise the local, r	Support	No specific reasons given	Retain as notified
291.308	Peter and Janine Stackhouse	Energy	ENG-P2 Existing activities Enable the ongoing refurbishment, maintenance and repair, an	Support	No specific reasons given	Retain as notified
291.309	Peter and Janine Stackhouse	Energy	ENG-P3 Effects on renewable electricity generation activities Only allow new sensitive act	Support	No specific reasons given	Retain as notified
291.310	Peter and Janine Stackhouse	Energy	ENG-P4 Small scale renewable electricity generation activities and investigation activities ou	Support	Supports with amendments to also enable small scale renewable electricity generation activities within overlays, particularly extensive overlays such as ONL and RSL where entire properties are affected. Considers energy-related overlays (e.g., National Grid yard, Waitaki Power Scheme) should not restrict renewable energy generation and that natural hazard overlays are generally irrelevant to renewable energy effects beyond structural limitations. Considers small-scale renewable energy generation should be enabled across all overlays, with large-scale activities controlled only within identified overlays. Also considers that the PDP should "recognize and provide for" small-scale renewable electricity generation to align with the NPS-REG.	Seeks to amend as follows: ENG-P4 Small scale renewable electricity generation activities and investigation activities ~~outside of overlays~~ ~~Enable~~Recognise and provide for small scale renewable electricity generation activities and activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation activities, where: ~~1. it is of a form, location and scale that minimises adverse effects on the environment; and~~ ~~2. it is consistent with the anticipated amenity values and character of the zone; and~~ ~~3. where it is demonstrated that all adverse effects on an overlay cannot be avoided, it appropriately offsets or compensates the adverse effects.~~
291.311	Peter and Janine Stackhouse	Energy	ENG-P5 Small scale renewable electricity generation activities and investigation activities in	Oppose	Considers that small-scale renewable energy generation should be provided for under the NPS-REG as its effects are minor and existing overlay chapters already manage structural impacts. Considers that discouraging such activities may lead to greater reliance on large-scale projects with more significant effects.	Seeks to delete the policy. Alternatively, seeks to amend as follows: ~~Only allow~~Recognise and provide for small scale renewable electricity generation activities and activities associated with the investigation, identification and assessment of potential sites and

						energy sources for renewable electricity generation activities within an overlay where: 1. if located on buildings, items and sites identified in SCHED2 – Historic Heritage Items, SCHED3 – Character Contributing Buildings and non-contributing buildings where the building is a character contributing building, and SCHED5 – Sites and Areas of Significance to Māori: a. its location is sympathetic to the identified values where practicable; and b. ~~any structure is not visible from any adjoining public place and~~ where practicable, is aligned with the plane of the roof where located on a roof; 2. if located within the root protection area of a tree identified in SCHED4 - Notable Trees, the work will not likely compromise the long-term health, natural life or values of the Notable Tree; ... ~~5. it is demonstrated that all adverse effects on the values of the relevant overlay cannot be avoided, it appropriately offsets or compensates the adverse effects.~~
291.312	Peter and Janine Stackhouse	Energy	ENG-P6 Large scale renewable electricity generation activities Provide for large scale	Support	Considers that large scale activities have more significant effects and it is appropriate to manage them.	Retain as notified
291.313	Peter and Janine Stackhouse	Energy	ENG-P7 Large scale renewable electricity generation activities in other zones and within overl	Support	Considers that large scale activities have more significant effects and it is appropriate to manage them.	Retain as notified
291.314	Peter and Janine Stackhouse	Energy	ENG-P8 New technology Recognise the opportunity for new technology in renewable electri	Support	No specific reasons given	Retain as notified
291.315	Peter and Janine Stackhouse	Energy	ENG-P9 Decommissioning of renewable electricity generation activities Require that, during	Support	No specific reasons given	Retain as notified
291.316	Peter and Janine Stackhouse	Energy	ENG-R1 The operation, maintenance, and refurbishment of existing renewable electricity generat	Support	No specific reasons given	Retain as notified
291.317	Peter and Janine Stackhouse	Energy	ENG-R2 The operation, maintenance, and refurbishment of existing renewable electricity generat	Support	No specific reasons given	Retain as notified
291.318	Peter and Janine Stackhouse	Energy	ENG-R3 Small scale renewable electricity generation activities outside of an overlay Al	Support	Support but considers it should also apply within overlays subject to the provisions of the relevant chapter in that overlay.	Seeks to amend as follows: ENG-R3 Small scale renewable electricity generation activities ~~outside of an overlay~~

291.319	Peter and Janine Stackhouse	Energy	ENG-R4 Investigation activities outside of an overlay All zones Activity status: Perm	Support	No specific reasons given	Retain as notified
291.320	Peter and Janine Stackhouse	Energy	ENG-R5 Small scale renewable electricity generation activities and investigation activities in	Oppose	Considers small-scale renewable generation should be permitted activities as they are low impact and a restricted discretionary status adds disproportionate costs that discourage such activities and conflict with the NPS-REG.	Seeks to delete the rule and manage with ENG-R3. Alternatively, seeks to amend to a controlled activity [refer to original submission for full relief sought]
291.321	Peter and Janine Stackhouse	Energy	ENG-R6 Small scale renewable electricity generation activities and investigation activities wi	Support	No specific reasons given	Retain as notified
291.322	Peter and Janine Stackhouse	Energy	ENG-R7 Large scale renewable electricity generation activities General Rural Zone Act	Oppose	Considers that renewable energy as a non-complying activity across overlays contradicts the NPS-REG, especially where overlays are intended for energy generation, and given that adverse effects are already managed by other chapters, the activity should be (restricted) discretionary.	Seeks to amend as follows: Activity status: Restricted Discretionary [refer to original submission for full relief sought]
291.323	Peter and Janine Stackhouse	Energy	ENG-R8 Other renewable electricity generation activities not otherwise provided for All	Oppose	Considers the rule is unclear in scope and appears to pre-emptively control assumed future effects without justification and this will discourage innovation and renewable energy generation contrary to the NPS-REG. Considers any necessary controls should be addressed in relevant chapters only when actual effects are known.	Seeks to delete ENG-R8 and manage the effects within the relevant zone or overlay chapter.
291.324	Peter and Janine Stackhouse	Energy	ENG-S1 Small scale solar panels All zones The panel must not exceed the permitted bu	Support	No specific reasons given	Retain as notified
291.325	Peter and Janine Stackhouse	Energy	ENG-S2 Small scale roof mounted wind turbines All zones The turbine (including the f	Support	No specific reasons given	Retain as notified
291.326	Peter and Janine Stackhouse	Energy	ENG-S3 Small scale freestanding wind turbines General Rural Zone Special Purpose Zo	Support	No specific reasons given	Retain as notified
291.327	Peter and Janine Stackhouse	Energy	ENG-S4 Small scale hydro generators General Rural Zone Rural Lifestyle Zone Industr	Support	Supports with amendments as the 200m^2 limit is too restrictive for stored water and the dam height is better regulated under the Dam Safety Regulations 2022. Considers the matters of discretion vague, such as 'suitability of the site' and lack clarity and justification, especially when many dams relate to existing water bodies or irrigation systems.	Seeks to amend as follows: 1. The maximum surface area of any stored water <u>solely for hydroelectricity</u> does not exceed 200m2; and 2. the maximum height of a weir or dam <u>solely for hydroelectricity</u> does not exceed 2m; and 3. the maximum installed capacity does not exceed 4 megawatts (MW).

						Matters of discretion are restricted to: ... ~~3. the suitability of the site for the proposed activity; and~~ ...
291.328	Peter and Janine Stackhouse	Earthworks	EW(Q)-S2 Setback from a site boundary General Rural Zone Special Purpose Zone – Macra	Support	Supports the setback standard for farm quarries but considers the required distance from neighboring properties should be reduced as considers it is excessive and limits quarry location options. Further notes that the remaining land is less suitable due to high groundwater and being in the middle of paddocks.	Seeks to amend setback to 20m consistent with the set back from waterways. Seeks to amend as follows: 1.<u>New</u> Farm quarries and <u>new</u> restricted use quarries must not be located within ~~100m~~<u>20m</u> of <u>a residential activity on</u> an adjoining site under different ownership from that of the land on which the farm quarry or restricted use quarry is located. 2. On sites adjoining a Residential or Settlement Zone boundary, the setback shall be at least 300m from the boundary <u>for any new quarry, including restricted use quarry and farm quarry.</u>
291.329	Peter and Janine Stackhouse	NOIC – North Otago Irrigation Company Limited	North Otago Irrigation Scheme Designation Unique Identifier NOIC-1 Designation P	Support	No specific reasons given	Retain as notified
291.330	Peter and Janine Stackhouse	Historic Heritage	General	Support	Support in part. No specific reason given.	No specific relief sought - refer to original submission for provision based points
291.331	Peter and Janine Stackhouse	SCHED2 – Historic Heritage Items 100-199	HH 136 Name (Original) Ngapara Rock Shelter Site: Rock Shelter Rock Drawings	Support	Support extent of HH 136 heritage setting	Seeks to retain as notified.
292.1	Robert and Sylvia Borst	Strategic Direction	General	Support	In general support of Strategic Direction chapter, in particular the historical and cultural identity and values, and the rural areas. [Refer to original submission for full reasons]	Retain as notified
292.2	Robert and Sylvia Borst	Definitions	Agricultural intensification in relation to the Ecosystems and Indigenous Biodiversity c	Oppose	[Refer to original submission for full reasons]	Refer to original submission for full relief sought Seeks to add a new definition as follows: ~~Agricultural intensification:~~<u>High rate irrigation:</u> in relation to the~~Ecosystems and Indigenous Biodiversity chapter, Natural Features and Landscapes chapter, and the~~ Sites and Areas of Significance to Māori chapter <u>where rock art is identified</u>, means change from non-irrigated primary production (including plantation forestry) to irrigated agricultural production <u>that is irrigated to a depth more than 10mm, or not controlled by a Freshwater Farm Plan on land that is not currently irrigated as of 1st March 2025</u>.~~It also includes any change from irrigated crop and seed production to dairy-farming.~~

292.3	Robert and Sylvia Borst	Definitions	Commercial activity NPS means any activity trading in goods, equipment or services. It	Oppose	Considers the definition captures not-for-profit and charity trading unlikely to be of a scale to cause significant adverse effects.	Seeks to amend as follows: Commercial activities: means any activity trading in goods, equipment or services for profit....
292.4	Robert and Sylvia Borst	Definitions	Farm building means a building used for the exercise of farming activities and excludes:	Oppose	Considers the term 'primary production activities' should be used consistently in the PDP.	Seeks to amend as follows: means a building used for the exercise of ~~farming~~ primary production activities and excludes:
292.5	Robert and Sylvia Borst	Definitions	Farm track An un-sealed private track serving permitted agricultural or forestry activit	Oppose	Considers that the definition of farm track should also include those serving consented activities and that sealed farm tracks offer environmental benefits such as reducing sediment loss and controlling dust. Considers that the term 'primary production activity should be used as there is no definition for 'agricultural' activity.	Seeks to amend as follows: An un-sealed or sealed private track serving ~~permitted agricultural or forestry~~primary production activities.
292.6	Robert and Sylvia Borst	Definitions	Hazardous facility means a facility or activity that involves the use, storage or dispos	Oppose	No specific reason given.	Seeks to retain as notified
292.7	Robert and Sylvia Borst	Definitions	Heritage professional means a person with a degree or recognised post-graduate qualifica	Amend	Considers the phrase 'recognised postgraduate qualification' too vague, as it doesn't specify who recognises it or how.	Seeks to amend as follows: means a person with a degree or ~~recognised~~ post-graduate qualification in a field related to heritage conservation or management ..
292.8	Robert and Sylvia Borst	Definitions	Identified taoka has the same meaning as in the National Policy Statement on Indigenous	Oppose	Considers that there should be a schedule or list of acknowledged or identified taoka as the PDP's use of the term 'taoka' is ambiguous, making it unclear whether references are to identified or acknowledged taoka.	Seeks to add a schedule of identified taoka and acknowledged taoka into the PDP. Remove provisions for taoka until a list is provided and provisions can be submitted on.
292.9	Robert and Sylvia Borst	Definitions	Intensive outdoor primary production means primary production activities involving the	Oppose	Considers that the definition is vague and open to subjective interpretation and that the terms 'regular' and 'substantially provided other than from the site concerned' should be defined.	Seeks to amend as follows: Intensive outdoor primary production means primary production activities involving the keeping or rearing of livestock, or commercial aquaculture, where the ~~regular~~majority feed source for the production of goods is ~~substantially~~ provided other than from the site concerned... It excludes the following: ... e. Primary production activities when a drought is declared
292.10	Robert and Sylvia Borst	Definitions	Pervious surface means any part of a site which is grassed or planted in trees or shrubs	Oppose	Considers that other surfaces may be pervious such as stones or other types of garden.	Seeks to amend as follows: Pervious surface means any part of a site which ~~is grassed or planted in trees or shrubs and~~ is capable of absorbing water including soft landscaping, grass and planted

						trees or shrubs. It does not include impervious surfaces or any area which:
292.11	Robert and Sylvia Borst	Definitions	Potentially high-impact industrial activities means industrial activities that because o	Oppose	Considers the definition to be broad, unintentionally including hunting, home kill, and septic tanks, which are low-impact and may duplicate regional consent requirements. Additional consent burdens may discourage the development of quality housing and affordable food production.	Seeks to amend as follows: ... 2.commercial and non-pest species meat processing, or ~~any~~ associated processing of meat and meat by-products, or co-products; ... 10. storage and disposal of sewage, septic tank sludge, or refuse other than at the source;
292.12	Robert and Sylvia Borst	Definitions	Recreational activity means the use of land and/or buildings for the purpose of active o	Oppose	Considers that the definition is circular as it uses 'recreation' within the definition itself.	Seeks to amend as follows: Recreational activity: means the use of land and/or buildings for the purpose of active or passive enjoyment of organised sports, ~~recreation~~ or entertainment. Excludes any recreational activity within the meaning of residential activity.
292.13	Robert and Sylvia Borst	Definitions	Regionally significant infrastructure is: strategic land transport network and arterial	Support	No specific reasons given	Retain as notified
292.14	Robert and Sylvia Borst	Definitions	Repair workshop means the mechanical repair and servicing of motor vehicles (includes mo	Oppose	Considers that if the definition was applied outside of the Local Centre Zone it could include farm and residential workshops.	Retain as notified - but only in the LCZ. If used in other zones, seeks to amend as follows: Repair workshop means the commercial mechanical repair and servicing of motor vehicles (includes motorcycles, caravans, boat motors, trailers) inside a building.
292.15	Robert and Sylvia Borst	Definitions	Sensitive environment area of land contained within any of the following areas: Coa	Oppose	Considers that the district plan has no jurisdiction on airspace and that the correct term for the height of land above sea level is 'elevation'.	Seeks to delete clause (11) or amend as follows: 11. Above 900 metres in ~~altitude~~elevation
292.16	Robert and Sylvia Borst	Definitions	Riparian margin means: for land in the General Rural Zone, all landward property adjo	Oppose	Considers the definition is inconsistent with other measures under the RMA which manage similar sediment issues such as the regulations controlling intensive winter grazing which have a 5m buffer.	Seeks to amend as follows: 1. ~~for land in the General Rural Zone,~~ all landward property adjoining and within ~~20~~ 5 metres of the boundary of the bed of a river or lake, or of the edge of a wetland; ~~and~~ ~~2. for land outside the General Rural Zone, all landward property adjoining and within 10 metres of the boundary of the bed of a river or lake, or of the edge of a wetland.~~

292.17	Robert and Sylvia Borst	Definitions	Temporary activity means activities and their ancillary buildings and structures that ar	Support	Supports the definition but considers that the undefined term 'helicopter' could be interpreted too broadly and include anything from a drone, gyrocopter through to high impact military helicopters which require support services. Considers that the term 'aircraft' is appropriate to use as it encompasses helicopters, drones, gyrocopters, and fixed-wing aircraft.	Seeks to amend clause (6) as follows: 6. temporary ~~helicopter~~ aircraft take-offs and landings; and
292.18	Robert and Sylvia Borst	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Considers that the term 'chemical' [clause (6)] is too broad and could include harmless substances like water or atmospheric gases and that requiring proof of a change to the hydrological balance is impractical, as baseline data is not generally available. Considers that many of the listed effects may occur accidentally or naturally, and the wording should allow for such occurrences. Considers it ambiguous whether cushionfield [clause (8)] is the competitor or the outcompeted species referred to. Also considers the reference to mob-stocking [clause (10)] is unclear and potentially contradictory, as grazing is excluded from the definition and is often beneficial to ecosystems - suggests using the term 'pugging' as an alternative. Considers that the term 'established farming practice' lacks a clear method or explanation for how it is determined. Considers that restrictions on indigenous vegetation removal may disincentivise new plantings and will be more expensive to establish than exotic species (which also offer better returns under the Emissions Trading Scheme) and would also limit access to non-threatened indigenous species like manuka, which are valuable for low-cost home heating.	Seeks to amend as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation established as at 1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate: 1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of ~~chemicals~~harmful substances including herbicide; 7. burning; 8.~~the deliberate~~ application of water, fertiliser or oversowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion, ~~including dryland cushionfield species;~~ 9.~~the~~ drainage of mapped wetlands or lakes; ~~10. mob-stocking; and~~ 11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site;~~ b. walking; c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood
292.19	Robert and Sylvia Borst	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried (not mined). Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	Seeks to amend as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones~~, and a prescribed substance within the meaning of the Atomic Energy Act 1945
292.20	Robert and Sylvia Borst	Mana whenua	General	Support	Support in part [Refer to original submission for full reasons]	Seeks to retain as notified

292.21	Robert and Sylvia Borst	Mana whenua	Consultation with mana whenua	Support	Supports in part. Support is expressed for clearly identifying when mana whenua may be affected by a proposal. Considers that where iwi consultation is encouraged, costs should be recoverable and that for matters of national importance (including mana whenua, historic heritage, natural features, ecosystems, and natural hazard), costs should be publicly funded, not charged to individual applicants. Considers that specifying applicant fees is outside the scope of the PDP and that consultation processes should be guided by memorandums of understanding or similar, as recommended in the SASM Section 32 report.	Seeks to remove reference to applicants being charged fees for consultation and for a memorandum of understanding to be consulted on prior to further submissions.
292.22	Robert and Sylvia Borst	Natural Hazards	NH-O1 Natural hazard risk The risks from natural hazards, including the effects of climate	Support	Supports with modifications to include proportionality of the avoidance and mitigation to the level of risk.	Seeks to amend as follows: The impact on people, property and the environment from the risks of natural hazards and the effects of climate change are recognised, avoided or mitigated relative to the level of risk.
292.23	Robert and Sylvia Borst	Natural Hazards	NH-P1 Identification of natural hazard areas As information becomes available, identify an	Support	Support in part with modification to better focus the policy.	Seeks to amend as follows: As information becomes available, identify and map land that ~~may~~is known to be subject to natural hazards, including taking into account the effects of climate change.
292.24	Robert and Sylvia Borst	Natural Hazards	NH-P2 Risk based approach Avoid subdivision, use and development in areas where natural	Support	No specific reasons given	Retain as notified
292.25	Robert and Sylvia Borst	Natural Hazards	NH-P3 Critical facilities and regionally significant infrastructure Avoid locating critica	Support	No specific reasons given	Retain as notified
292.26	Robert and Sylvia Borst	Natural Hazards	NH-P4 Natural protection features Encourage the use, protection, maintenance and enhanc	Support	Support with recommendation to expand scope to explicitly require engineering solutions where natural protection features are unsuitable, particularly in cases involving the protection of infrastructure, people, and property, where more reliable methods may be necessary.	Seeks to amend as follows: Encourage the use, protection, maintenance and enhancement of natural features, buffers and systems, such as wetlands and vegetation, which provide protection from natural hazard risk where engineering solutions are not required to mitigate risk to people, property and infrastructure.
292.27	Robert and Sylvia Borst	Natural Hazards	NH-P13 Other natural hazard awareness overlays Encourage proposals for subdivision, use an	Support	Supports in part but considers an assessment should not be required in all cases, especially when there's no evidence that a specific use is at risk from an awareness overlay. Considers there is no clear definition of what constitutes an 'acceptable level' of risk and who determines it.	Seeks to amend as follows: Encourage proposals for subdivision, ~~use~~ and development in a natural hazard awareness overlay to undertake an assessment of natural hazard risk and incorporate any methods to reduce or mitigate the risk. ~~to an acceptable level.~~ Alternatively, if 'use' is to remain, seeks to amend as follows: Encourage proposals for subdivision, use and development in a natural hazard awareness overlay to ~~undertake~~

						~~an assessment~~consider the effects of natural hazard risk and incorporate methods to reduce or mitigate the risk ~~to anacceptable level.~~
292.28	Robert and Sylvia Borst	Natural Hazards	NH-R1 Buildings, structures and fences in the Otago Flood Assessment Overlay All zones	Oppose	Considers the definition should acknowledge that other farm structures, like poles or irrigation infrastructure, are not more flood-prone or hazardous than those already listed and may even mitigate risk. Considers the term 'suitably qualified and experienced professional' should be clarified.	Seeks to amend as follows: PER-1 The building or structure is: ... 3. an unenclosed building without a floor or with a concrete floor; or ... 6. a pole; or 7. irrigation or stockwater infrastructure Seeks clarification on the term 'suitably qualified and experienced professional'
292.29	Robert and Sylvia Borst	Natural Hazards	NH-R2 Buildings, structures and fences in the Canterbury Flood Assessment Overlay All z	Oppose	Considers the definition should acknowledge that other farm structures, like poles or irrigation infrastructure, are not more flood-prone or hazardous than those already listed and may even mitigate risk.	eeks to add provision for other floors in buildings and structures like poles and water infrastructure.
292.30	Robert and Sylvia Borst	Natural Hazards	NH-R4 Earthworks excluding land disturbance in all Flood Assessment Overlays All zones	Support	Supports with recommendation to permit the building of tracks.	Seeks to amend as follows: PER-3 The earthworks are for the construction of a farm track.
292.31	Robert and Sylvia Borst	Natural Hazards	NH-R6 Land use activities in the Canterbury Flood Assessment Overlay, the Otago Flood Assessme	Support	Supports with recommendation to add other uses which are compatible with the objectives and policies of the Natural Hazards chapter such as airstrips and helicopter takeoff and landing areas.	Seeks to amend as follows: 5. Aeroplane airstrips and helicopter take off and landing areas.
292.32	Robert and Sylvia Borst	Natural Hazards	NH-P5 Site specific assessment/investigation A risk assessment will be required for subdiv	Support	No specific reasons given	Retain as notified
292.33	Robert and Sylvia Borst	Natural Hazards	NH-P6 Canterbury Flood Assessment Overlay Except as provided for in NH-P3, avoid subdiv	Support	No specific reasons given	Retain as notified
292.34	Robert and Sylvia Borst	Natural Hazards	NH-P7 Otago Flood Assessment Overlay and Waitaki River Floodplain Assessment Overlay Ex	Support	No specific reasons given	Retain as notified
292.35	Robert and Sylvia Borst	Natural Hazards	NH-P11 Liquefaction Assessment Overlay Provide	Support	No specific reasons given	Retain as notified

			for subdivision in the Liquefaction Assessm			
292.36	Robert and Sylvia Borst	Natural Hazards	NH-P12 Wildfire – subdivision and land use Ensure that subdivision and land use in area	Support	No specific reason given.	Seeks to retain as notified.
292.37	Robert and Sylvia Borst	Natural Hazards	NH-R3 Buildings, structures and fences in the Waitaki River Floodplain Assessment Overlay	Oppose	Considers the definition should acknowledge that other farm structures, like poles or irrigation infrastructure, are not more flood-prone or hazardous than those already listed and may even mitigate risk.	Seeks to add provision for other floors in buildings and structures like poles and water infrastructure.
292.38	Robert and Sylvia Borst	Natural Hazards	NH-R13 Wildfire – woodlots, shelterbelts, plantation forestry and buildings All zones	Amend	Supports with modification to encourage the planting of low flammability plants, particularly near houses.	Seeks to amend as follows: PER-4 The woodlot, shelterbelt or plantation forestry is a species listed in the FENZ Low Flammability Plant Directory.
292.39	Robert and Sylvia Borst	Hazardous Substances	General	Support	Support for chapter and definitions	Seeks to retain as notified.
292.40	Robert and Sylvia Borst	Historic Heritage	HH-O1 Protection of historic heritage The District's historic heritage is recognised, main	Support	No specific reasons given	Retain as notified
292.41	Robert and Sylvia Borst	Historic Heritage	HH-O2 Use and adaptive re-use of historic heritage Historic Heritage Items and their herit	Support	Supports noting that primary production is sympathetic re-use of the heritage settings where existing.	Retain as notified
292.42	Robert and Sylvia Borst	Historic Heritage	HH-P1 Recognise historic heritage Identify Historic Heritage Items and their associated	Support	Support with recommendation to recognise landowners' interests and consent in heritage protection. Considers heritage protection to be more effective when landowners are constructively engaged and permission is required for listing.	Seeks to amend as follows: With landowner permission, identify Historic Heritage Items and their associated heritage settings throughout the Waitaki district that warrant protection in SCHED2 – Historic Heritage Items, and are significant in terms of one or more of the following values:...
292.43	Robert and Sylvia Borst	Historic Heritage	HH-P2 Historic heritage scheduling Classify Historic Heritage Items and their associate	Support	No specific reasons given	Retain as notified
292.44	Robert and Sylvia Borst	Historic Heritage	HH-P3 Benefits of active use, adaptive re-use, and protection of historic heritage Recogni	Support	Support in the context of re-use being primary production.	Retain as notified
292.45	Robert and Sylvia Borst	Historic Heritage	HH-P4 Heritage maintenance Enable the use and heritage maintenance of the Historic Heri	Support	Support in the context of re-use being primary production.	Retain as notified

292.46	Robert and Sylvia Borst	Historic Heritage	HH-P5 Modern service attachments Enable attachments to Historic Heritage Items included	Support	No specific reasons given	Retain as notified
292.47	Robert and Sylvia Borst	Historic Heritage	HH-P6 Heritage restoration Control the heritage restoration of Historic Heritage Items	Support	No specific reasons given	Retain as notified
292.48	Robert and Sylvia Borst	Historic Heritage	HH-P7 Retaining historic heritage – earthquake and flooding resiliency Encourage earthquak	Support	No specific reasons given	Retain as notified
292.49	Robert and Sylvia Borst	Historic Heritage	HH-P8 Protecting historic heritage from inappropriate heritage alterations Provide for	Support	No specific reasons given	Retain as notified
292.50	Robert and Sylvia Borst	Historic Heritage	HH-P9 Relocation of Historic Heritage Items within or beyond their heritage setting Allow	Support	No specific reasons given	Retain as notified
292.51	Robert and Sylvia Borst	Historic Heritage	HH-P10 Demolition or destruction of Category B Historic Heritage Items Only allow the d	Support	No specific reasons given	Retain as notified
292.52	Robert and Sylvia Borst	Historic Heritage	HH-P11 Demolition or destruction of Category A Historic Heritage Items Avoid the demolitio	Support	No specific reasons given	Retain as notified
292.53	Robert and Sylvia Borst	Historic Heritage	HH-P12 Buildings and structures within heritage settings Only allow new buildings and s	Support	No specific reasons given	Retain as notified
292.54	Robert and Sylvia Borst	Historic Heritage	HH-P13 Subdivision of sites containing Historic Heritage Items Only allow subdivision o	Support	No specific reasons given	Retain as notified
292.55	Robert and Sylvia Borst	Historic Heritage	HH-P14 Planning incentives to encourage the sustainable use of Historic Heritage Items Ass	Support	No specific reasons given	Retain as notified
292.56	Robert and Sylvia Borst	Historic Heritage	HH-P15 Future consideration of historic heritage Council continues to investigate the iden	Oppose	Considers this to be a council matter, not a planning matter as future councils may have different priorities and should not be bound by past policies or required to undertake a plan change between cycles.	Seeks to delete the policy.

292.57	Robert and Sylvia Borst	Historic Heritage	HH-R1 Heritage maintenance on Historic Heritage Items listed in SCHED2 – Historic Heritage Ite	Support	No specific reasons given	Retain as notified
292.58	Robert and Sylvia Borst	Historic Heritage	HH-R2 Animal grazing on sites and their heritage setting identified in SCHED2 – Historic Herit	Support	Supports in the context of a working farm.	Retain as notified
292.59	Robert and Sylvia Borst	Historic Heritage	HH-R3 Earthworks within the heritage setting of a Historic Heritage Item listed in SCHED2 – Hi	Support	Supports in the context of a working farm.	Retain as notified
292.60	Robert and Sylvia Borst	Historic Heritage	HH-R5 New buildings, structures and signs, or alterations to an existing building or structure	Support	Support with suggested modifications to reflect the practical needs of heritage items located in a rural contexts where structures like fences and pipes are necessary for primary production.	Seeks to amend as follows: PER 1 Any new building, structure or sign is: … <u>5. is a post and wire or post and rail fence; or</u> <u>6. is irrigation or stock water infrastructure; or</u>
292.61	Robert and Sylvia Borst	Historic Heritage	HH-R12 Relocation of a Category B Historic Heritage Item listed in SCHED2 – Historic Heritage	Support	No specific reason given	Retain as notified
292.62	Robert and Sylvia Borst	Historic Heritage	HH-R13 Relocation of a Category A Historic Heritage Item listed in SCHED2 – Historic Heritage	Oppose	Considers that the relocation of heritage items can sometimes improve their condition or address health and safety risks (for example the Herbert War Memorial) and that making consent too difficult may increase the risk of demolition by neglect.	Seeks to amend HH-R13 to a discretionary activity.
292.63	Robert and Sylvia Borst	Historic Heritage	HH-R14 Any demolition of a Historic Heritage Item listed in SCHED2 – Historic Heritage Items	Oppose	Considers this to be a council matter, not a planning matter as future councils may have different priorities and should not be bound by past policies or required to undertake a plan change between cycles.	Seeks to delete HH-M1
292.64	Robert and Sylvia Borst	Historic Heritage	HH-R14 Any demolition of a Historic Heritage Item listed in SCHED2 – Historic Heritage Items	Support	Supports the intent but considers this to be a council matter rather than a planning matter.	Seeks to delete HH-M4
292.65	Robert and Sylvia Borst	Notable Trees	General	Support	Support for the chapter	Retain as notified
292.66	Robert and Sylvia Borst	Notable Trees	TREE-P5 Other trimming and pruning of Notable Trees Provide for any other trimming of N	Support	Support with modifications as not possible to confirm long-term impacts of trimming on tree health or lifespan in advance. Considers 'likelihood' is a more practical measure than certainty. Also considers that trimming may alter a tree's natural form, especially when removing diseased or hazardous limbs and that	Seeks to amend as follows: Provide for any other trimming of Notable Trees where it can be demonstrated that the works do not:

					TREE-S1 should also be considered regarding the retention of natural form.	1.likely compromise the long-term health of the Notable Tree; 2. compromise the identified values of the Notable Tree, listed in SCHED4 - Notable Trees; 3.likely reduce the natural life of the Notable Tree; 4. increase the risk of the Notable Tree being subject to wind damage; and 5. impact the natural shape and form of the Notable Tree more than necessary.
292.67	Robert and Sylvia Borst	Notable Trees	TREE-S1 Trimming of Notable Trees All zones The maximum branch diameter being trimm	Support	No specific reason given	Retain as notified
292.68	Robert and Sylvia Borst	Notable Trees	TREE-S2 Trimming or removal of Notable Trees posing a threat to people or property All	Support	No specific reason given	Retain as notified
292.69	Robert and Sylvia Borst	Notable Trees	TREE-S3 Trimming or removal of Notable Trees All zones The works are undertaken or	Support	No specific reason given	Retain as notified
292.70	Robert and Sylvia Borst	Notable Trees	TREE-R1 Maintenance of the ground within the root protection area of a Notable Tree All	Support	No specific reason given	Retain as notified
292.71	Robert and Sylvia Borst	Notable Trees	TREE-R2 Trimming or pruning of a Notable Tree All zones Activity status: Permitted	Support	No specific reason given	Retain as notified
292.72	Robert and Sylvia Borst	Notable Trees	TREE-R3 Removal of a Notable Tree All zones Activity status: Permitted Where: PER-1	Support	No specific reason given	Retain as notified
292.73	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	General	Oppose	[refer to original submission for full reasons]	[Refer to original submission for relief sought]
292.74	Robert and Sylvia Borst	SCHED5 – Schedule of Sites and Areas of Significance to Maori	ID ref Name Description and Values SASM007 Waitaki River The nam	Oppose	Oppose in part Schedule 5. The property is encumbered with the following SASM overlays: SASM013 [refer to original submission for full reasons]	[Refer to original submission for relief sought]
292.75	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	General	Oppose	Considers that Freshwater Farm Plans are set to become the primary planning tool for farmland and aim to streamline consent processes by managing farming effects within a single plan under the RMA, and these may also incorporate SASM values. Considers that Freshwater Farm Plans retain a level playing field because the landowner is obligated to have it certified to carry out activities, while the iwi are obligated to consult with the landowner to advise on protection of their significant sites. Both obligations require good faith and genuine relationships rather than expensive consent burdens involving the district council.	Seeks to reduce consent burdens on farmers and allow them to plan directly with iwi in good faith through Freshwater Farm Plans.

292.76	Robert and Sylvia Borst	Mana whenua	General	Oppose	Considers there to be a conflict of interest as the plan states that Aukaha helped draft the provisions and will also charge for consultation on them. Considers there needs to be a clear separation between plan-making and implementation.	Seeks that farms with a certified Freshwater Farm Plan (FWFP) include a chapter on SASM management, allowing for permitted activity status. Alternatively, consultation could be provided by a Suitably Qualified Person (SQP) with relevant qualifications and experience, promoting a competitive market and reducing workload for iwi
292.77	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	General	Oppose	Considers the uncertainty of time and cost associated with consenting, particularly under the SASM provisions should be supported by a service level agreement. Considers that some issues are better addressed through RMA reform and that many Significant Natural Areas and Natural Features and Landscapes appear to have been mapped without proper landowner engagement.	Seeks for the withdrawal of the Sites and Areas of Significance to Māori, Natural Features and Landscapes, Natural Character and Ecosystems and Biodiversity Chapters until the RMA reform is complete and an MOU is in place with Aukaha detailing time and cost of consultation.
292.78	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-O1 Rakatirataka and kaitiakitaka The rakatirataka of mana whenua over their signif	Amend	Supports the intent with modification to clarify that the objective is not intended to be in isolation from the landowner. Considers that that the exercise of kaitiakitaka can't be implemented without agreement from the land owners who have their own rights and responsibilities within their own relationship with the land.	Seeks to amend as follows: The rakatirataka of mana whenua over their significant sites and areas is recognised and they are able to exercise kaitiakitaka within these areas with agreement from the landowners.
292.79	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-O2 Protection of wāhi tūpuna values The relationship of mana whenua with wāhi tūpuna	Support	Support for the objective particularly the goal of increasing community awareness of wāhi tūpuna values. Considers that landowners have historically maintained relationships with these sites without needing district plan provisions and that regulation is not necessary to sustain mana whenua connections.	Seeks that the values for protection need to be identified in the PDP.
292.80	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-O3 Preservation of tuhituhi neherā The integrity of tuhituhi neherā sites is prese	Support	No specific reasons given	Retain as notified
292.81	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-O4 Enhancement of mahika kai Mahika kai values are enhanced to support customary use.	Support	Support with modification to recognise that mahika kai values are maintained and where appropriate these values enhanced, as it may not always be possible to enhance.	Seeks to amend as follows: Mahika kai values are maintained or, enhanced where appropriate to support customary use.
292.82	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-O5 Access and use for customary purposes Mana whenua are able to access wāhi tūpuna f	Oppose	Considers the objective requires clarification that it does not imply a general right of access to wāhi tūpuna and that access should be with landowner permission. Considers the Trespass Act is impractical for managing access and may strain iwi–landowner relationships.	Seeks to amend as follows: Mana whenua are able to access, where appropriate, wāhi tūpuna for customary purposes and are able to use mahika kai resources in accordance with tikaka and with landowner agreement.
292.83	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-P1 Identification of wāhi tūpuna Working with mana whenua, identify, on Planning m	Support	No specific reason given	Retain as notified
292.84	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-P2 Mana whenua involvement in resource management processes Provide for the invol	Oppose	Considers the policy should clarify whether rules apply only where wāhi tūpuna values remain, or even where they've been physically altered but still hold cultural significance. Considers that consultation for all activities within or near wāhi tūpuna areas places a significant burden on landowners and mana whenua and	Seeks to amend the SASM overlay to map only where the values are known to still exist. If the maps cannot be changed, seeks to amend as follows:

					the policy should be more targeted, directing consultation and notification to situations where it would meaningfully support the protection or enhancement of wāhi tūpuna values.	Provide for the involvement of mana whenua in resource management processes affecting identified wāhi tūpuna by encouraging consultation and engagement with mana whenua prior to undertaking activities which will have an adverse effect on the maintenance or enhancement of~~or applying for resource consent within or adjoining~~identified wāhi tūpuna.
292.85	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-P3 Management of wāhi tūpuna Only allow or provide for land use and development in id	Amend	Support with amendment to provide for the protection of existing uses.	Seeks to amend as follows: ~~Only allow or provide for~~ Ensure new land use and development in identified wāhi tūpuna ~~where it~~ avoids significant adverse effects, and avoids, remedies or mitigates other adverse effects, on the remaining values associated with these areas, having particular regard to:
292.86	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-P4 Obstruction of mauka, tuhituhi neherā and wai māori by structures Avoid the loc	Support	Support is given in part to SASM-P4, with a preference for clearly identifying the locations of mauka, tuhituhineherā, and waimāori on District Plan maps to guide where structures should be avoided. Considers provision should also be made for compatible structures that support land uses enhancing wāhi tūpuna values, and the policy should explicitly protect existing uses while avoiding vague terms like “or near.”	Seeks to amend as follows: Avoid the location of new structures in riparian margins, on ~~or near~~ limestone outcrops, on upper slopes and on ~~or near~~ ridgelines unless: 1. they do not obstruct views to and across culturally significant waterbodies, tuhituhineherā or mauka; and 2.~~they avoid adverse effects on the~~ the structure can maintain or enhance the wāhi tūpuna values of these areas.
292.87	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-P5 Protection of integrity of tuhituhi neherā Avoid the following activities on, o	Oppose	Concerns with the assumptions in irrigation modelling used to assess impacts and considers evidence suggests water loss may be overestimated and low-rate irrigation can avoid adverse effects. Considers that while the intent to protect tuhituhineherā is supported, the policy should acknowledge that some existing agricultural and forestry activities have been compatible with these values and may continue to be so.	Seeks to permit and encourage low-rate irrigation and discourage high-rate irrigation [refer to original submission]. Also seeks for the protection of existing uses to be explicitly provided for in SASM-P4. Seeks to amend as follows: Avoid the following new activities on areas mapped as, ~~or in close proximity to~~, limestone outcrops. 1.~~agricultural intensification~~high-rate irrigation; and 2. plantation forestry,unless any adverse effects on the integrity of tuhituhi neherā from disturbance of land and vegetation and changes in the water table, soil water environment and air moisture are avoided.
292.88	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-P6 Culturally incompatible activities Avoid degradation of the values of wāhi tūpu	Support	No specific reason given.	Seeks to retain as notified.
292.89	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-P7 Habitat restoration and enhancement Encourage	Support	No specific reason given.	Seeks to retain as notified.

			restoration and enhancement of indig			
292.90	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-P8 Mahika kai activities Enable mana whenua to undertake mahika kai activities in ide	Support	Support in part with a request for modification, as the PDP does not grant general access rights or transfer ownership of mahika kai resources, and the current user notes lack legal standing and clarity on ownership. Considers the policy should be reworded to more accurately reflect how the objective will be achieved while fostering respectful relationships between landowners and iwi.	Seeks that the PDP should clarify that landowner permission is required to undertake mahika kai. Also seeks to amend as follows: Enable mana whenua to undertake mahika kai activities in identified wāhi tūpuna, in accordance with tikaka and with landowner agreement.
292.91	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-P9 Access for customary purposes Maintain existing access opportunities and encourage	Support	Support in part with a request to clarify that it does not create a general right of access to wāhi tūpuna on private land and that access should remain subject to landowner permission. Considers the policy should be reworded to reflect existing legal frameworks and practical considerations, ensuring respectful relationships and sustainable resource management.	Seeks to amend as follows: Maintain existing access opportunities and encourage enhancement of access, where appropriate, for mana whenua to identified wāhi tūpuna for customary purposes with landowner agreement.
292.92	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-P10 Wilding conifer species Protect wāhi tūpuna from modification by wilding conifer	Support	No specific reason given.	Seeks to retain as notified.
292.93	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-R1 Mahika kai activities within a wāhi tūpuna identified in SCHED5 – Sites and Areas of S	Support	Support in part with modifications.	Seeks to amend as follows: Activity status: Permitted Where: PER-1: An agreement is reached with the landowner permitting access and use of resources. Activity status when compliance is not achieved: ~~Not Applicable~~ Prohibited Note: The provisions in this rule do not override the provisions of the Trespass Act 1980. There is no general right of public access across private land or right to use private resources.
292.94	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-R2 Buildings and structures within a wāhi tūpuna identified in SCHED5 - Sites and Areas o	Oppose	Opposes in part, as the 200m^2 threshold lacks justification and may unnecessarily increase consent requirements, while compatible structures that support wāhi tūpuna values should be distinguished. A 6m height limit for buildings and 25m for structures such as silos is supported, and low-rate irrigation infrastructure should be permitted within 100m of limestone cliffs to avoid unintended environmental impacts. The rule should clarify restricted discretionary matters, avoid unnecessary expert assessments, and ensure access, alternatives, and enhancement requirements are practical and proportionate [refer to original submission].	Seeks to amend as follows: Activity status: Permitted Where: PER-1 The building or structure has a maximum building footprint of ~~200~~350m2; and PER-2 The building ~~or structure~~has a maximum height of 6m as

						measured from the existing natural ground level;and PER-3 The structure has a maximum height of 25m; and ~~PER-3~~PER-4 The building or structure is not located within 20m of a waterbody or 50m of a wetland (excluding farm buildings or farm structures less than 10m2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating);and ~~PER-4~~PER-5 The building or structure is not located on, or within, 100m of a limestone escarpment (excluding farm buildings or farm structures less than 10m2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating); and ~~PER-5~~PER-6 The building or structure is not located on or within 20m vertical distance of a ridgeline (excluding farm buildings or farm structures less than 10m2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating); and ~~PER-6~~PER-7 The building or structure is located at an elevation less than 900m above sea level (excluding farm buildings or farm structures less than 10m2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating). Matters of discretion are restricted to: 1. whether the relevant rūnaka has been consulted, the outcome of that consultation, and the extent to which the proposal responds to, or incorporates the outcomes of that consultation; and 2. the ~~potential~~ adverse effects on the values of the wāhi tūpuna, and the relationship of mana whenua with the area, including: a. loss of wāhi tūpuna associations through modification of the landscape and natural processes; and ~~b. damage to the integrity of wāhi tūpuna through disturbance of land and/or indigenous vegetation; and~~ c. disturbance of wāhi tapu and archaeological sites; and d. adverse effects on the ~~integrity~~ preservation of tuhituhi neherā sites ~~including through disruption of the landform or water balance in the area~~; and e. adverse effects on the mauri of waterbodies; and f. reduction in the extent and quality of mahika kai; and

						~~g. loss of access to mahika kai for customary activities; and~~ 3. effects on sites where there is the potential for kōiwi or artefacts to be found, including consideration of the need to impose an accidental discovery protocol or have a cultural monitor present; and ~~4. whether there are alternative methods, locations or designs that would avoid or reduce the impact on the values associated with wāhi tūpuna; and~~ ~~5. the appropriateness of any mitigation measures, including monitoring, planting or improved access for customary use; and~~ ~~6. whether the proposal provides an opportunity to recognise mana whenua culture, history and identity associated with the wāhi tūpuna, and any potential to:~~ ~~a. affirm the connection between mana whenua and the wāhi tūpuna; or~~ ~~b. enhance the cultural values of the wāhi tūpuna~~ Activity status when compliance is not achieved: ~~Non-Complying~~ Discretionary Where: ~~NC-1~~DIS-1 Compliance is not achieved with PER-3, PER-5 and/or PER-6 Notification: Any application made under RDIS-1 and/or NC-1 may be notified to Te Rūnanga o Moeraki
292.95	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-R3 Indigenous vegetation clearance within a wāhi tūpuna, identified in SCHED5 - Sites and	Support	Support with modification to avoid discouraging the planting of new indigenous vegetation that could later be constrained by the rule. Considers that a permitted pathway for landowners operating under certified Freshwater Farm Plans would provide an efficient way to manage indigenous vegetation removal without requiring council involvement.	Seeks to amend as follows: PER-1 … k. improved pasture … PER-4 The indigenous vegetation was planted after 1st March 2025 and complies with a certified Freshwater Farm Plan.
292.96	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-R4 Earthworks within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significanc	Oppose	Opposes in part because, as proposed, it would impose unnecessary consenting burdens on routine earthworks, particularly where there is little or no evidence of underlying archaeological values across much of the mapped area. Considers that removing SASM overlays from farm bases and improved pasture, or modifying the rule to rely more on permitted activity standards, higher earthworks thresholds, and the removal of duplicated matters of discretion, would better manage effects while reducing regulatory burden. Considers that higher cut and area thresholds, combined with permitted activity conditions or	Refer to original submission for full relief sought. Seeks to add the following new PERs to SASM-R4 [GRUZ/RLZ/OSZ]: PER-3 The permitted activity standards of EW-R1 are complied with; and PER-4

					setbacks, would appropriately manage effects, particularly in residential and developed settings where SASM values are likely to have already been compromised. [refer to original submission for full reasons]	Earthworks are set back 100m from tuhituhi nehera and complies with a certified Freshwater Farm Plan; and PER-5 Earthworks are set back 20m from mahika kai resources; and PER-6 Access to mahika kai resources is not obstructed; and ... PER-9 The earthworks are associated with any permitted activity under SASM-R2. [GRZ/SETZ] Where: ~~PER-5~~ PER-10 All earthworks where they comply with the following earthworks standards where relevant: 1. EW-S1 Threshold areas [submitting change to 1,000m]. 2. EW-S2 Maximum cut depth and fill height [submitting change to 3m cut and fill depth];and 3. EW-S4 Earthworks within 20 metres of a waterbody
292.97	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-R5 Urupā within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significance to	Support	Support for existing urupā, but request that new urupā be treated the same as cemeteries due to similar environmental effects, while acknowledging their different cultural and spiritual significance.	Seeks to retain as notified.
292.98	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-R6 Amenity planting and shelterbelts within a wāhi tūpuna, identified in SCHED5 – Sites a	Support	Support but considers specific provision to permit existing shelterbelts within 100m of limestone escarpments is required.	Seeks to amend as follows: Where: PER-1 The new amenity planting or shelterbelt is not located on or within 100m of a limestone escarpment.
292.99	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-R7 Natural hazard mitigation structures within a wāhi tūpuna, identified in SCHED5 - Site	Support	Support with modification to allow a permitted pathway for councils or private applicants to create natural hazard structures, provided iwi are consulted to ensure any permitted activity pathway addresses potential effects on cultural values.	Seeks to consult with iwi regarding effects they wish to manage with SASM-R7 and what a permitted activity pathway could be. Amend as follows: Activity status: ~~Restricted Discretionary~~ Permitted PER-1 Fish passage is not impeded.

						~~Where:~~ ~~RDIS-1~~ ~~The structures are erected by, or on behalf of, Waitaki District Council, Otago Regional Council, or Canterbury Regional Council.~~ ~~Matters of discretion are restricted to:~~ ~~1. The matters of discretion listed in SASM-R2 RDIS-1.~~ Notification: Any application made under ~~this rule~~DIS-1 may be notified to Te Rūnanga o Moeraki.
292.100	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-R8 Agricultural intensification within a wāhi tūpuna, identified in SCHED5 - Sites and Ar	Oppose	No specific reason given.	[refer to original submission]
292.101	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-R9 Commercial outdoor recreation within a wāhi tūpuna, identified in SCHED5 - Sites and A	Support	Support if SASM overlays are adjusted to exclude improved pasture, otherwise, opposes the rule as considers it unnecessarily restricts landowner diversification in less sensitive areas without clear evidence of adverse effects. Considers iwi oversight is justified for archaeological sites, but requiring consent for recreation in non-sensitive areas needs strong justification.	Seeks to delete the rule if the SASM mapping remains.
292.102	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-R10 Plantation forestry activities within a wāhi tūpuna, identified in SCHED5 - Sites and	Support	No specific reason given.	Seeks to retain as notified.
292.103	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-R11 Mining activities, farm quarries or quarrying activities within a wāhi tūpuna, identi	Oppose	Oppose in part requesting that farm quarries be excluded from the rule and permitted with appropriate setbacks from sensitive sites, so properties mostly covered by a SASM overlay can still meet operational needs. Considers existing quarries should remain permitted, and the rule could be supported if the overlay mapping is rationalised as submitted.	Seeks to amend as follows: New mining activities, farm quarries or quarrying activities within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significance to Māori Activity status: ~~Discretionary~~Permitted Where: PER-1 The farm quarry is set back 100m from tuhituhinehera, waterways, limestone escarpments, archaeological sites and cemeteries or urupa. ~~DIS-1~~PER-2 Gravel extraction is required for flood mitigation works. undertaken by a regional council. Notification: Any application made under NC-1~~this rule~~ may be notified to Te Rūnanga o Moeraki.

292.104	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-R12 Cemeteries or crematoria within a wāhi tūpuna, identified in SCHED5 - Sites and Areas	Support	No specific reason given.	Seeks to retain as notified.
292.105	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-R13 Landfills within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significanc	Support	No specific reason given.	Seeks to retain as notified.
292.106	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-R14 Wastewater treatment plants within a wāhi tūpuna, identified in SCHED5 - Sites and Ar	Support	No specific reason given.	Seeks to retain as notified.
292.107	Robert and Sylvia Borst	Sites and Areas of Significance to Maori	SASM-R15 Planting wilding conifer species within a wāhi tūpuna, identified in SCHED5 - Sites a	Support	No specific reason given.	Seeks to retain as notified.
292.108	Robert and Sylvia Borst	Earthworks	General	Oppose	Oppose in part noting that small-scale, occasional earthworks are essential for primary production, land management, and health and safety, and are critical to the economic and sustainable management of land and water resources	No specific relief sought.
292.109	Robert and Sylvia Borst	Earthworks	EW-O1 Earthworks activities Earthworks activities enable people and communities, social	Support	No specific reason given.	Seeks to retain as notified.
292.110	Robert and Sylvia Borst	Earthworks	EW-O3 Protecting communities Earthwork activities are undertaken in a manner that maint	Support	No specific reason given.	Seeks to retain as notified.
292.111	Robert and Sylvia Borst	Earthworks	EW-O2 Protecting sensitive environments Indigenous biodiversity, natural landscapes, natur	Support	Support with modification to clarify and narrow scope by defining “natural landforms,” referencing “Significant Natural Areas” for indigenous biodiversity and aligning references to “natural landscapes” and “natural features” with Outstanding Natural Landscapes and Features, while ensuring existing earthworks in sensitive environments can continue. Considers the objective should also reference ‘Historic and Cultural Values’ for clarity and efficiency and protect long-standing activities like the Oamaru Stone Quarry within sensitive environments.	Seeks to amend as follows: ~~Indigenous biodiversity~~Significant Natural Areas, Outstanding natural landscapes, ~~natural landforms,~~Outstanding natural features, ~~mana whenua~~ and historic and cultural ~~heritage~~ values are protected from the adverse effects of new earthworks
292.112	Robert and Sylvia Borst	Earthworks	EW-P1 Enabling earthworks Enable earthworks where the scale, extent and effects are approp	Support	No specific reason given.	Seeks to retain as notified.
292.113	Robert and Sylvia Borst	Earthworks	EW-P2 Protecting sensitive environments Provide for earthworks where adverse effects on th	Support	No specific reason given.	Seeks to retain as notified.

292.114	Robert and Sylvia Borst	Earthworks	EW-P3 Conservation activities within sensitive environments Enable earthworks that facilit	Support	No specific reason given.	Seeks to retain as notified.
292.115	Robert and Sylvia Borst	Earthworks	EW-P4 Primary production activities Enable earthworks that support the operational effi	Support	Support with modification to allow earthworks for installing identified infrastructure and farm buildings, as considers these are managed by existing standards and provide positive environmental effects. Considers enabling primary production activities should be maximised outside sensitive environments, which are already protected by other plan provisions.	Seeks to amend as follows: Enable earthworks that support the operational efficiency of primary production activities, including the construction, maintenance and repair of existing farm tracks, farm buildings, yards, irrigation systems, fences, dams, stormwater infrastructure, sedimentation ponds, culverts and stormwater drains.
292.116	Robert and Sylvia Borst	Earthworks	EW-P5 Construction and maintenance of farm tracks and recreational tracks Enable earthwork	Support	No specific reason given.	Seeks to retain as notified.
292.117	Robert and Sylvia Borst	Earthworks	EW-P6 Earthworks within the National Grid Yard Enable earthworks within the National Grid	Support	No specific reason given.	Seeks to retain as notified.
292.118	Robert and Sylvia Borst	Earthworks	EW-P7 The effects of earthworks Manage any earthworks to avoid, remedy or mitigate adve	Support	Support with modification to clarify that effects should be controlled beyond the site boundary and that visual amenity and local amenity values should only apply off-site and in sensitive environments, while removing soil quality as it is a regional council matter.	Seeks to amend as follows: Manage any earthworks to avoid, remedy or mitigate adverse effects on the following: 1. the stability of land, buildings and structures at or beyond the boundary of the site; and 2. the visual amenity values of the site in a sensitive environment, and after rehabilitation; and ~~3. natural landforms; and~~ 4. local amenity values beyond the boundary of the site; and 5. erosion and sediment loss from the site; and ~~6. natural hazard risk; and~~ 7. the stormwater management systems; and 8. dust, lighting, odour, vibration, noise and traffic beyond the boundaries of the site; and~~9. soil quality.~~
292.119	Robert and Sylvia Borst	Earthworks	EW-P8 Rehabilitation of disturbed ground Enable earthworks that enhance, restore or rehabi	Support	Support with modification that restoration should not always reflect the surrounding landform and vegetation, but enhancement or rehabilitation may require different approaches such as replacing undesirable species with more suitable ones. Considers the policy should enable positive changes rather than require strict replication of existing conditions.	Seeks to amend as follows: Enable earthworks that enhance, restore or rehabilitate areas of disturbed ground ~~to reflect the surrounding landform and vegetation.~~
292.120	Robert and Sylvia Borst	Earthworks	EW-R1 General earthworks located outside of a sensitive environment All zones Activit	Support	Support with modified standards as detailed below [refer to original submission].	Seeks to retain as notified but with amended standards [refer to original submission]
292.121	Robert and Sylvia Borst	Earthworks	EW-R2 Earthworks for repair and maintenance activities within or outside of a sensitive enviro	Support	Support with the addition of construction of infrastructure and farm buildings, so that earthworks for house builds or small sheds are permitted without unnecessary extra consent, while large-scale construction remains controlled by existing thresholds.	Seeks to amend as follows:

						Earthworks for construction, repair and maintenance activities within or outside of a sensitive environment PER-1 ... 10. farm buildings; and PER-3 Earthworks undertaken for the lawful establishment of: 1. farm tracks; 2. yards; 3. water supply and irrigation systems; 4. fences; 5. dams/ponds; 6. walking and cycling tracks; 7. driveways and accessways; 8. stormwater infrastructure, sediment detention ponds, culverts and stormwater drains; 9. coastal hard protection structures;
292.122	Robert and Sylvia Borst	Earthworks	EW-R3 Earthworks for the construction of farm tracks, public footpaths, public bridle paths an	Support	Support with amendment to allow wider dairy tracks (at least 6.5–8m) and accommodate larger machinery, as recommended by Dairy NZ and typical for the Waitaki District.	Seeks to amend as follows: Where: PER-1 The track is associated with a permitted or lawfully established activity within the zone and does not exceed ~~4~~8 metres in width with an additional allowance of 1 metre either side of the track for battering; and
292.123	Robert and Sylvia Borst	Earthworks	EW-R4 Earthworks for conservation activities within a sensitive environment All zones	Support	Support with a higher threshold, as considers requiring consent for conservation earthworks in sensitive environments could discourage important activities like fencing SNAs or planting indigenous species.	Seeks to either permit the relevant earthworks thresholds for the underlying zone or increase the threshold within all conservation activities rules. Seeks to amend as follows:

						Earthworks for conservation activities within a riparian margin or sensitive environment Activity status: Permitted Where: PER-1 ~~On any site earthworks do not exceed 25m2 in area over any 3 year period.~~ ~~PER-2~~ All of the following standards are complied with: 1. EW-S2 Maximum cut depth and fill height; 2. EW-S3 Earthworks on sloping sites; and ~~3. EW-S4 Earthworks within 20m of a waterbody.~~ Activity status when compliance is not achieved: Restricted Discretionary Where: RDIS-1 Compliance is not achieved with ~~PER-2~~PER-1 Matters of discretion are restricted to: 1. the matters of discretion listed in any of the standards EW-S2, EW-S3 and/or EW-S4 that are not complied with.~~Activity status when compliance is not achieved: DiscretionaryWhere:DIS-1Compliance is not achieved with PER-1~~
292.124	Robert and Sylvia Borst	Earthworks	EW-R5 Earthworks within a riparian margin All zones Activity status: Permitted Wher	Support	Support with modifications to clarify the distinction between regional and district council responsibilities, remove duplication in matters of discretion, permit maintenance of water supply systems, and limit consideration of cumulative effects to those specifically identified.	Seeks to amend as follows: PER-3 ... c. water supply or irrigation systems; Matters of discretion are restricted to: ... 2. the extent and management of adverse effects or cumulative effects on natural character of the riparian margin, including: a. the extent to which the proposed earthworks will: i. allow natural elements to dominate; and ~~ii. introduce man-made elements to the riparian margin; and~~ iii. affect the amenity values of the riparian margin; and iv. create disturbances that will be

						... ~~ix. restrict access for mahika kai purposes; and~~ ~~3. any cumulative effects.~~
292.125	Robert and Sylvia Borst	Earthworks	EW-R6 Earthworks and land disturbance within the National Grid Yard All zones Activit	Support	No specific reason given.	Seeks to retain as notified.
292.126	Robert and Sylvia Borst	Earthworks	EW-R7 Earthworks within a sensitive environment All zones Activity status: Discretion	Support	No specific reason given.	Seeks to retain as notified.
292.127	Robert and Sylvia Borst	Earthworks	EW-S1 Threshold areas (m2) All Residential Zones Rural Lifestyle Zone Settlement Zo	Oppose	Considers that area thresholds are an inadequate tool for managing earthworks as they focus on the size of the activity rather than its environmental impact and effect management should take precedence over area measurement. Considers that thresholds should be used as matters of discretion or permitted activity criteria, not rigid limits and that the current thresholds are too low, capturing routine activities like house scrapes, silage pits, and shed construction. Also considers that the standards duplicate those in the NFL chapter, regarding landscape effects, which are subjective and undefined outside NFL overlays.	Seeks to remove area thresholds so they default to regional council thresholds and introduce standards or permitted activity criteria to manage the effects of earthworks directly. If threshold areas are to remain seeks to increase threshold to 1,000m2 for all zones. Seeks to amend as follows: Matters of discretion are restricted to: 1. whether ~~the e~~arthworks changing the landform of a ridgeline are of a type, scale and form that is appropriate for the location and anticipated character of the zone; and 2. the management of silt, sediment and erosion on-site; and 3. impacts on ~~character and~~ amenity values beyond the site boundary, ~~natural landforms and features~~, including whether the cut face and/or any retaining structures can be concealed behind development or effectively landscaped; and 4.~~visual amenity, including~~ landscape treatment, site reinstatement and screening; and ~~5. the potential for cumulative effects on the natural form of the landscape; and~~ ... ~~Note: A landscape assessment may be required for the assessment of this standard.~~ ...
292.128	Robert and Sylvia Borst	Earthworks	EW-S2 Maximum cut depth and fill height The cut depth or fill height must not exceed 1	Support	Support for EW-S2 with modification to reduce the number of consents that will be required across the district.	Seeks to amend as follows: 1. The cut depth or fill height must not exceed ~~1.5~~ 3metres as measured vertically; and

						2. Cut or fill supported by a retaining wall must be setback a distance at least equal to the height of the retaining wall. 3. Cut and fill equal to or less than 0.5m in height is exempt from this standard. 4. Cut and fill for building platforms is exempt from this standard. 5. Earthworks over 1.5m in height or depth that take place within 1.5m of a site boundary require a written approval from the adjoining landowner. ~~Note: Earthworks over 1.5m in height or depth that take place within 1.5m of a site boundary may require a written approval from the adjoining landowner.~~
292.129	Robert and Sylvia Borst	Earthworks	EW-S3 Earthworks on sloping sites Earthworks must not take place on slopes with an ang	Support	No specific reason given	Retain as notified
292.130	Robert and Sylvia Borst	Earthworks	EW-S4 Earthworks within 20 metres of a waterbody Earthworks shall not take place withi	Support	Support with modification to reduce consent costs and improve clarity around when ecological or landscape reports are required.	Seeks to amend as follows: Matters of discretion are restricted to: 1. the provision of sediment control techniques to ensure sediment run-off does not enter a waterbody; and2. effects of earthworks within 5m of the waterbody on the natural character and ecological values of the waterbody; and ~~3. impacts on the character and amenity values, natural landforms and features; and~~ ~~4. management of visual amenity effects through~~ landscape treatment, site reinstatement and screening; and ~~5. the potential for cumulative effects on the natural form of the landscape.~~ Note: A site management plan may be required for consideration of the assessment matter 1. Note: An ecological report ~~and/or landscape assessment~~ may be required for consideration of matters of discretion (2),~~(3), (4) and (5)~~ in EW-S4.
292.131	Robert and Sylvia Borst	Earthworks	General	Support	Support the rules, objectives and policies overall especially EW(Q)-P1 for farm quarries, as enabling on-farm aggregate use benefits the environment by reducing road wear and transport emissions.	Seeks to retain as notified.
292.132	Robert and Sylvia Borst	Earthworks	EW(Q)-P4 Existing quarries Enable the continued	Support	Support the protection of existing quarries beyond existing use rights, as considers it is critical to avoid excessive consent	Seeks to retain as notified.

			operation of existing lawfully established		barriers that could threaten their continued operation, similar to the challenges faced by landfills.	
292.133	Robert and Sylvia Borst	Earthworks	EW(Q)-R1 Farm quarry General Rural Zone Special Purpose Zone - Macraes Mining Activ	Support	Support with modification, as considers the current restriction on quarrying in sensitive environments is too broad and prevents the benefits of farm quarrying across much of the district. Considers the rule should be proportionate to the scale limits already in place and earthworks in sensitive environments are managed by other chapters.	Seeks to amend as follows: PER-6 The farm quarry is not located within ~~a sensitive environment or within~~ the Coastal Environment or Coastal Natural Hazard overlays.
292.134	Robert and Sylvia Borst	Earthworks	EW(Q)-R4 Quarrying activities (excluding farm quarry and restricted use quarry) Special	Support	Support with modification for consistency, as the current daily extraction limit of 100m3 is inconsistent with the allowed number of heavy vehicle trips in (CON-4).	Seeks to amend as follows: CON-3 The quantity of aggregate extracted is limited to ~~100m3~~ 200m3 day; and
292.135	Robert and Sylvia Borst	Earthworks	General	Support	General support but considers that quarrying activities currently captured by the mining definition should instead be managed under quarrying provisions to ensure protection for existing quarries.	Seeks to retain as notified but with changes to mineral definition as submitted [refer to submission #298.19].
292.136	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	General	Oppose	Oppose the chapter in part - considers proceeding with identifying new SNAs before the government's review and changes to the NPS-IB will create unnecessary and repeated requirements for landowners and the community, especially given the current suspension of council obligations to identify new SNAs until October 2027.	Seeks to retain the existing policy and rule framework for managing indigenous biodiversity in the ODP and implement only the requirements of the NPS-IB where SNAs have already been identified by the current/operative district plan. Seeks to defer the wider chapter review until there is more certainty from government and until such time that the review of the NPS-IB has occurred.
292.137	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-O1 Halt the decline of indigenous biodiversity Halt the decline of the Waitaki Dist	Oppose	Oppose in part, supporting the management of indigenous biodiversity in line with national direction, but seek amendment to focus maintenance and enhancement efforts on significant habitats and fauna, rather than requiring resource-intensive calculations across all zones. Considers the objective should prioritize consistency with national policy and target significant areas for enhancement where appropriate.	Seeks to amend as follows: ~~Halt the decline~~ Manage of the Waitaki District's indigenous biodiversity ~~so there is at least no overall loss, including between species and ecosystems~~, by maintaining and, where appropriate, enhancing indigenous biodiversity, in areas of mapped significant indigenous habitats and significant fauna (Significant Natural Areas) ~~and to achieve this~~ by: 1. protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity while providing for the social, cultural and economic wellbeing of people and communities now and in the future; and 2. recognising the mana of takata whenua ~~as~~ to exercise kaitiaki ~~of~~ in relation to maintaining, enhancing and restoring indigenous biodiversity; and 3. recognising people and communities, including landowners, as guardians of indigenous biodiversity.
292.138	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-O2 Identify and protect Significant Natural Areas	Oppose	Oppose in part, seeking modification for clarity and consistency with ECO-O1, and to ensure the objective focuses on the purpose of identifying SNAs, involves transparent partnership with	Seeks to amend as follows:

			Areas identified as Significant Natu		landowners, and does not discourage new indigenous plantings. Considers SNAs should only be identified where indigenous biodiversity already exists as of March 1, 2025 and the process should recognise the role of sustainable land uses in maintaining significant values and avoid duplicating efforts or undermining trust with landowners.	ECO-O2 Identify ~~and protect~~ Significant Natural Areas ~~Areas identified as Significant Natural Areas are protected to ensure no net loss of indigenous biodiversity or indigenous biodiversity values as a result of land use activities.~~Work with people and communities, including mana whenua and land owners, to identify Significant Natural Areas of indigenous biodiversity established in accordance with the NPS-IB.
292.139	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-O3 Restore or enhance Significant Natural Areas Significant Natural Areas are resto	Support	Support in part, agreeing that restoration and enhancement should be encouraged where appropriate, but also emphasising the need to allow appropriate development where area values can be maintained, as many existing land management practices have already supported significant indigenous habitats and fauna.	Seeks to amend as follows: Existing mapped Significant Natural Areas are restored or enhanced, where appropriate and provision is made for the appropriate subdivision, use and development where the values of the area can be maintained.
292.140	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-P1 Evaluation of Significant Natural Areas Identify the ecological significance of	Oppose	Considers ECO-P1 should be deferred until the government review of the NPS-IB is complete.	Seeks for the deletion of ECO-P1 [refer to original submission for full relief sought] If ECO-P1 is not deleted, seeks to amend as follows: Work with mana whenua and land owners to identify the ecological significance of indigenous vegetation and habitats of indigenous fauna established before 1st March 2025 using; ~~1. the criteria contained in APP5 – Criteria for identifying areas that qualify as Significant Natural Areas (SNA); or~~ 1. The criteria in the NPS IB; or 2. in the case of Crown owned land, Clause 3.8(8) of the National Policy Statement on Indigenous Biodiversity and: ~~3. where they are known and meet the criteria to be SNA's, list them in SCHED6 Significant Natural Areas and on the Planning Maps;~~ ~~3. where they are not known,~~applying the criteria through the resource consent process, notice of requirement, outline plan, or other planning processes, to determine an area's significance; and 4. if a new Significant Natural Area is identified as a result of a resource consent application, include the SNA in SCHED6 – Significant Natural Areas in the next appropriate plan review or plan change notified by Waitaki District Council.
292.141	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-P2 Protection of Significant Natural Areas Except as provided for in clause 2 belo	Support	Support in part, with modification to split into simpler policies for clarity and ensuring sustainable land uses can continue alongside SNAs where effects are managed so landowners can maintain pest control and reinvestment in significant natural areas.	Seeks to amend as follows: 1. Except as provided for in clause 2 below, protect Significant Natural Areas listed in SCHED6 – Significant Natural Areas by: a. ensuring the following adverse effects are avoided, remedied or mitigated on the: i. loss of ecosystem representation and extent;

						.... 2.~~The~~ Manage any adverse effects of subdivision, use and development on identified SNA's ~~shall be managed~~in accordance with 1.b. above only, in relation to the following activities: a. the new subdivision, use or development is required for the purposes of any of the following: i. construction or upgrade ~~(if the upgrade does not meet the requirements of clause 3.15(2) of the National Policy Statement on Indigenous Biodiversity)~~ of specified infrastructure that provides significant national or regional public benefit: or ... v. there is a functional need or operational need for the new subdivision, use or development to be in that particular lo
292.142	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-P3 Appropriate activities within Significant Natural Areas Enable limited - earthw	Support	Support in part - [No specific reason given]	Seeks to amend as follows: Enable limited - ... 3. Is for a lawfully established activity; or 4. The activity as a functional need to be located in the area; or 5. The activity has no more than minor adverse effects on the significant indigenous vegetation of fauna or habitat.
292.143	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-P4 Supporting the maintenance, restoration and enhancement of indigenous biodiversity	Support	Support in part, seeking amendments to recognise that different areas may require different management approaches, that primary production can benefit indigenous biodiversity, and that eco-sourced planting should only be required where justified. Also notes that integrated management across administrative boundaries can only be encouraged, not enforced. [refer to original submission for full reasons]	Seeks to amend as follows: ... 3. encouraging, ~~or where appropriate requiring,~~ the use of eco-sourced indigenous plantings where it is available; 4.~~ensuring it is managed~~ encourage management in an integrated way, within, and across administrative boundaries; 5. giving effect to the decision-making principles set out in Clause 1.5 of the National Policy Statement on Indigenous Biodiversity; 6. recognising that maintaining indigenous biodiversity ~~requires~~ can be achieved by: a. the maintenance and ~~at least~~no overall reduction of ~~all~~ the following: ... 7. promoting increased indigenous vegetation cover in both urban environments and non-urban environments where appropriate; 8. requiring that significant adverse effects of activities on indigenous biodiversity (outside of SNA's or on specified Māori land) are managed by applying appropriate thresholds for

						indigenous vegetation clearance which was established after 1st March 2025, and where these are not met, by applying the biodiversity effects management hierarchy. 9. Recognising the benefits of farm management practices and active management of indigenous biodiversity including voluntary animal and plant pest and stock control and/or formal legal protection.
292.144	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-P5 National priorities for protection Recognise the following national priorities f	Support	No specific reason given.	Seeks to retain as notified.
292.145	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-P6 Impacts of climate change on resilience of ecosystems Take into account the potenti	Support	Support in principle, but suggests modifications to align with the NPS-IB by focusing on considering specific, known effects of climate change rather than speculative future impacts.	Seeks to amend as follows: ~~Take into account the potential future impacts~~Consider the effects of climate change to promote resilience of indigenous biodiversity to climate change: ...
292.146	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-P7 Providing for the relationship of takata whenua with indigenous biodiversity Pro	Support	No specific reason given.	Seeks to retain as notified.
292.147	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-P8 Indigenous vegetation on urban environment allotments Recognise that indigenous	Support	Support with a modification to include 'domestic curtilage' as defined in the plan, to ensure properties with septic tanks that don't meet the 'urban environment allotment' definition aren't unnecessarily subject to the ECO chapter's stricter requirements.	Seeks to amend as follows: Indigenous vegetation on domestic curtilage ~~urban environment allotments~~ Recognise that indigenous vegetation on domestic curtilage~~urban environment allotments~~ is not protected, unless specifically scheduled in the plan as a Significant Natural Area or Notable Tree.
292.148	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-P9 Precautionary approach Adopt a precautionary approach to considering the adverse	Support	No specific reason given	Seeks to retain as notified.
292.149	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-P10 Provision for maintenance of improved pasture for primary production where it may affe	Support	Supported with modifications to improve clarity by removing unnecessary subjectivity, particularly the requirement to demonstrate that maintenance of improved pasture is part of a regular cycle through "adequate evidence." Considers that the definition of pasture already implies ongoing maintenance, and that the requirement for pasture not to have become an SNA is circular and unnecessary because once land is an SNA it is already subject to separate protections. [refer to original submission for full reasons]	Seeks to amend as follows: Allow for the maintenance of improved pasture to continue where: 1.~~there is adequate evidence to demonstrate that~~ the maintenance of improved pasture is part of a regular cycle of periodic maintenance of that pasture; 2. any adverse effects of the maintenance of improved pasture on an identified SNA are no greater in intensity, scale, or character than the effects of activities previously undertaken as part of the regular cycle of periodic maintenance of that pasture;

						~~3. the improved pasture has not, itself, become an SNA;~~ ~~4. the land is not an uncultivated depositional landform; and~~ 5. the maintenance of improved pasture will not adversely affect a threatened or at risk (declining) species.
292.150	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-P11 Highly mobile fauna In relation to habitats of highly mobile fauna: identify a	Oppose	Considers the policy should be deferred until the NPS-IB review is complete.	Seeks to delete ECO-P11. If retained, seeks modification to make it consistent with the NPS IB and prevent duplication between territorial authority and regional council [refer to original submission for full relief sought] Seeks to amend as follows: In relation to habitats of highly mobile fauna: 1.Assist the regional council to identify and manage areas outside of SNA's that support specified highly mobile fauna to maintain their populations across their natural range, and improve information and awareness around them; and 2. manage the adverse effects of activities on them, in order to maintain viable populations of specified highly mobile fauna across their natural range.
292.151	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-P12 Restoration of indigenous biodiversity In relation to restoration of indigenous	Support	No specific reason given	Seeks to retain as notified.
292.152	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-P13 Commercial forestry In relation to commercial forestry: the adverse effects of	Support	Support in part with appropriate management of commercial forestry within existing mapped SNA areas.	Seeks to amend as follows: In relation to commercial forestry: 1. the adverse effects of commercial forestry activities in any existing commercial forest on any identified SNA must be managed in a manner that: a. maintains indigenous biodiversity in the identified SNA as far as practicable; while b. providing for commercial forestry activities to continue; and 2. despite ECO-P2, any part of an identified SNA that is within an area of an existing commercial forest that is planted, or is intended to be, replanted in trees for harvest must be managed over the course of consecutive rotations of production in the manner necessary to maintain the long-term populations of any threatened or at risk (declining) species present in the area.
292.153	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-P14 Managing indigenous vegetation outside Significant Natural Areas Avoid signific	Oppose	Considers the policy is overly broad and imposes disproportionate cost and complexity across the district, despite the NPS-IB not requiring territorial authorities to avoid significant adverse effects on indigenous vegetation outside SNAs.	Seeks to delete the provision.
292.154	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-P15 Inappropriate activities within or near to Significant Natural Areas Prohibit t	Support	Support with modification to specify that only deliberate planting is included.	Seeks to amend as follows: Prohibit the deliberate planting of:

292.155	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-R1 Indigenous vegetation clearance outside of a Significant Natural Area listed in SCHED6	Support	Support, in particular the provision permitting indigenous vegetation clearance for existing established activities, provided appropriate thresholds or circumstances are met.	Seeks to retain as notified.
292.156	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-R2 Indigenous vegetation clearance within a Significant Natural Area listed in SCHED6 – Si	Support	Support in part, endorsing clearance of indigenous vegetation where there is a functional need within listed SNAs, but suggesting that minor breaches of permitted activity standards may not always warrant an ecological assessment and this should be reflected in the note.	Seeks to amend note as follows: Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any application made under this provision ~~must provide~~will likely require, in addition to the standard information requirements, an Ecological Assessment, provided by a suitably qualified ecologist, that is commensurate with the scale and significance of the proposal, and meets the requirements of APP8 - ECO Chapter Information Requirements for Resource Consents.'
292.157	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-R3 Earthworks within a Significant Natural Area listed in SCHED6 – Significant Natural Are	Support	Support with modifications to improve practicality by allowing earthworks within mapped SNAs where there is a functional need, and reconsidering the 10 working days' notice requirement, which may not be feasible in cases like emergencies or weather delays. Additionally, minor earthworks exceeding permitted standards may not always justify an ecological assessment, and the note should reflect this flexibility.	Seeks to amend as follows: PER-3 Silt and sediment control measures are in place to prevent discharge of silt and/or sediment into the Significant Natural Area ~~and notice is provided to Council 10 working days prior to the commencement of works.~~ Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any application made under this provision ~~must provide~~ will likely require, in addition to the standard information requirements, an Ecological Assessment, provided by a suitably qualified ecologist, that is commensurate with the scale and significance of the proposal, and meets the requirements of APP8 - ECO Chapter Information Requirements for Resource Consents.
292.158	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-R4 Exotic commercial forestry, agricultural intensification, quarrying activity or mining	Support	No specific reason given	Seeks to retain as notified with Matters of Discretion in the correct column.
292.159	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-R5 Commercial forestry, agricultural intensification, quarrying activity or mining activit	Support	No specific reason given	Seeks to retain as notified
292.160	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-R6 Planting non-indigenous vegetation within a Significant Natural Area listed in SCHED6 –	Support	Support in part, noting that a blanket prohibition on planting non-indigenous vegetation within SNAs could significantly impact existing primary production, and suggesting that such activities should be considered through a resource consent process where adverse effects can be appropriately managed.	Seeks to amend as follows: ~~Planting~~ Deliberate planting of new non-indigenous vegetation within a Significant Natural Area listed in SCHED6 – Significant Natural Areas Activity status: ~~Prohibited~~Discretionary

292.161	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-R7 Planting species that result in wilding conifers within a Significant Natural Area, or	Oppose	Oppose in part - should be clarified that only deliberate planting is controlled by ECO-R6 and ECO-R7.	Seeks to amend as follows: ~~Planting~~ Deliberate planting of species that result in wilding conifers within a Significant Natural Area, or within 100m of a Significant Natural Area listed in SCHED6 – Significant Natural Areas
292.162	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-S1 Indigenous vegetation clearance in highly sensitive ecological environments that are no	Oppose	Oppose ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification, and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators.	[Refer to original submission for full relief sought] Seeks to amend as follows: Indigenous vegetation clearance in highly sensitive ecological environments that meet SNA criteria but are not currently identified as Significant Natural Areas Apart from maintenance of improved pasture, there ~~There~~ shall be no indigenous vegetation clearance in the following locations:
292.163	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-S2 Indigenous vegetation clearance in sensitive ecological environments that are not curre	Oppose	Oppose ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification, and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators.	[Refer to original submission for full relief sought] Seeks to amend as follows: Indigenous vegetation clearance in sensitive ecological environments that meet SNA criteria but are not currently identified as Significant Natural Areas
292.164	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-S3 Indigenous vegetation clearance in threatened land environments Indigenous veget	Oppose	Oppose ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators.	[Refer to original submission for full relief sought] Seeks to amend as follows: Indigenous vegetation clearance in threatened land environments that meet SNA criteria but are not currently identified as Significant Natural Areas.
292.165	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-S4 Indigenous vegetation clearance areas dominated by snow tussock Indigenous vegetati	Oppose	Oppose ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification, and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators.	[Refer to original submission for full relief sought] Seeks to amend as follows: Indigenous vegetation clearance areas identified as dominated by snow tussock
292.166	Robert and Sylvia Borst	Ecosystems and Indigenous Biodiversity	ECO-S5 General indigenous vegetation clearance If not addressed by ECO-S1 to ECO-S4, th	Support	Support ECO-S5 with amendments to ECO-S1 to ECO-S4.	Seeks to retain as notified

292.167	Robert and Sylvia Borst	Natural Character	General	Support	General support for the chapter with modification to riparian margin definition.	Seeks to retain as notified with amendment to riparian margin definition
292.168	Robert and Sylvia Borst	Natural Features and Landscapes	General	Support	Support in part but considers the stringent provisions applied to NFL overlays are disproportionate to the land types and the scale of coverage.	Seeks to adjust the overlays so that stringent rules apply only to landscapes that are agreed with landowners as significant or outstanding.
292.169	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-O1 Outstanding Natural Features and Landscapes Outstanding Natural Features and Landsc	Support	No specific reason given	Seeks to retain as notified
292.170	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-O2 Significant Natural Features and Rural Scenic Landscapes The values of Significant	Support	Supports in part the objective to protect Significant Natural Features and Rural Scenic Landscapes but suggests values should be maintained only where appropriate.	Seeks to amend as follows: The values of Significant Natural Features and Rural Scenic Landscapes are maintained where appropriate.
292.171	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-O3 Wilding conifers The impact of wilding conifers on Outstanding Natural Features and	Support	Supports in part the objective to reduce the impact of wilding conifers on landscape areas and suggests the policy should encourage reduction of these effects.	Seeks to amend as follows: Encourage the impact of wilding conifers on Outstanding Natural Features and Landscapes, Significant Natural Features, and Rural Scenic Landscapes is be reduced.
292.172	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-O4 Restoration and enhancement of landscapes Outstanding Natural Features and Landscap	Oppose	Opposes the objective as currently worded, arguing that it could result in subjective assessments and requiring restoration and enhancement of landscape values may not always be practicable and suggests limiting the requirement to where practicable.	Seeks to amend as follows: Encourage the impact of wilding conifers on Outstanding Natural Features and Landscapes, Significant Natural Features, and Rural Scenic Landscapes is be reduced.
292.173	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-P1 Identification of Outstanding Natural Features and Landscapes In relation to the	Support	Supports in part the policy for identifying Outstanding Natural Features, but recommends using the full Pigeon Bay criteria as current wording omits some of the criteria and could be misleading. Also considers the policy implies changes could occur outside of the plan change or review process.	SeekstodeleteNFL-P1. If retained, seeks to include all Pigeon Bay criteria and an additional requirement to work onsite in consultation with the land owner. Seeks also to include a note that changes will only occur through normal plan change or plan review.
292.174	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-P2 Identification of Significant Natural Features and Rural Scenic Landscapes In re	Support	Supports in part the policy for identifying SNF/RSL but recommends using the full Pigeon Bay criteria as current wording omits some of the criteria and could be misleading. Also considers the policy implies changes could occur outside of the plan change or review process.	SeekstodeleteNFL-P2 If retained, seeks toinclude all Pigeon Bay criteria and an additional requirement towork onsite in consultation with the land owner. Seeks also to include a note that changes will only occur through normal plan change or plan review.
292.175	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-P3 Recognise the importance of protecting natural features and landscapes Recognise:	Support	No specific reason given.	Seeks to retain as notified.
292.176	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-P4 Avoiding inappropriate activities on or within Outstanding Natural Features or Landscap	Support	Supports in part the policy to avoid inappropriate activities on Outstanding Natural Features and Landscapes but considers there is ambiguity in the wording and seeks clearer discouragement of critical infrastructure in these areas and more precise identification of values.	Seeks to amend as follows: Only provide for subdivision, use and development where it: 1. protects the values identified in SCHED7 – Outstanding Natural Features and SCHED8 – Outstanding Natural Landscapes that

						make the natural feature or landscape outstanding; and ~~2. avoids, remedies or mitigates adverse effects on other Outstanding Natural Features and Landscapes values, including avoiding any significant loss of indigenous vegetation.~~ 2. avoids the placement of critical infrastructure within the Outstanding Natural Features and Landscapes unless there is no reasonable alternative due to the functional need for the location and the adverse effects on landscape values can be avoided or appropriately managed.
292.177	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-P5 Avoiding inappropriate activities on or within Significant Natural Features and Rural S	Support	Supports the policy for Rural Scenic Landscapes and Significant Natural Features, but requests clarification that only identified values are protected, to avoid ambiguity.	Seeks to amend as follows: Only provide for subdivision, use and development in Rural Scenic Landscapes and on Significant Natural Features where it: 1.maintains ~~amenity values; and~~ the values identified in SCHED9 - Significant Natural Features and SCHED10 - Schedule of Rural Scenic Landscapes. ~~2. avoids, remedies or mitigates adverse effects on other values of Significant Natural Features or Rural Scenic Landscapes, including avoiding any significant loss of indigenous vegetation.~~
292.178	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-P6 Landscape's ability to absorb change When determining a landscape's ability to abso	Support	Supports the policy but only if other landscape overlays are corrected as requested for ONF029.	Seeks to conditionally retain as notified.
292.179	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-P7 Earthworks within identified natural features and landscapes When determining if ea	Support	Supports the policy but only if other landscape overlays are corrected as requested for ONF029 [ONF025 - refer to submission point 298.169].	Seeks to conditionally retain as notified
292.180	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-P8 Buildings and structures on or within identified natural features and landscapes Wh	Support	Supports the policy but only if other landscape overlays are corrected as requested for ONF029 [ONF025 - refer to submission point 298.169].	Seeks to conditionally retain as notified.
292.181	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-P9 Subdivision on or within identified natural features and landscapes Avoid subdivisi	Support	Supports the policy but only if other landscape overlays are corrected as requested for ONF029 [ONF025 - refer to submission point 298.169].	Seeks to conditionally retain as notified.
292.182	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-P10 Wilding conifers Avoid the spread of wilding conifers by: prohibiting planting of	Support	Supports the policy but notes there is no incentive for landowners to remove wilding conifers and questions the effectiveness without council support.	Seeks to retain as notified but consider deleting clause (2) if there is no intention of following through.
292.183	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-P11 Enhancement and restoration of Outstanding Natural Features and Landscapes, Significan	Support	Supports in part the policy to enhance and restore landscape areas, but suggests restoration should only occur where appropriate.	Seeks to amend as follows: Support the enhancement and <u>where appropriate the</u> restoration of Waitaki's Outstanding Natural Features and Landscapes, Significant Natural Features and Rural Scenic Landscapes where

						their values have been lost or degraded by: ...
292.184	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-R1 Buildings and structures (excluding fences) on or within Outstanding Natural Features o	Oppose	Opposes the rule as considers that small-scale farm buildings should bepermittedas they are compatible with landscape management. Considers that if the ONF boundaries can be rationalised to only areas that are genuinely natural (not improved pasture) then NFL-R1 could be supported.	Seeks to amend as follows: Activity status: Permitted Where: PER-1 The structure is underground; or PER-2The building or structure is for primary production purposes, excluding residential units; and PER-3 The building or structure does not exceed 30m2; and PER-4 The building or structure does not exceed 3m in height; and PER-5 The building or structure complies with the following standard: 1. NFL-S1
292.185	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-R2 Buildings and structures (excluding fences) on or within Significant Natural Features o	Support	Supports in part but considers the rule should allow for minor buildings on Significant Natural Features as per the relief sought in submission point 298.185 or the same thresholds as in RSL.	Seeksto amend as follows: Activity status: Permitted Where: PER-1 The structure is underground; or PER-2 The building or structure is in a Rural Scenic Landscape ~~(except where it is also located on a Significant Natural Feature);~~and ...
292.186	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-R3 Permanent fencing on or within Outstanding Natural Features or Landscapes, Significant	Support	Supports in part but considers deer fencing up to 2.5m high be permitted for pest management.	... Seeks o amend as follows:

						PER-2 Any fence or gates are no more than 1.5m high (except any deer fence which can be up to ~~2m~~2.5m high).
292.187	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-R4 Earthworks on or within Outstanding Natural Features or Landscapes or Significant Natur	Support	Supports in part but only if improved pasture is removed from ONFL overlays, otherwise, GRUZ earthworks rules should apply. Considers that earthworks are often needed to install tracks to give access for conservation efforts.	Seeks to conditionally retain as notified.
292.188	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-R5 Primary production activities (excluding buildings, mining activities, quarrying activi	Support	Supports the policy with modifications to the definition of agricultural intensification and requests removal of improved pasture from overlays.	Seeks to amend the definition of agricultural intensification and remove improved pasture from ONFL's and SNF's. [refer to original submission for full relief sought]
292.189	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-R6 Amenity planting and shelterbelts on or within Outstanding Natural Features or Landscap	Support	Supports permitting amenity planting and shelterbelts in landscape areas, provided the mapping is accurate.	Seeks to retain as notified.
292.190	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-R7 Outdoor recreational activities (excluding buildings) on or within Outstanding Natural	Support	Supports the rule with modification to exclude not-for-profit and charities from the definition of commercial activities.	Seeks to amend the definition of commercial activities and seeks to add a permitted activity criteria specifically for temporary events, or an advice note advising that the Temporary Events chapter overrides NFL-R7.
292.191	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-R8 Landscape restoration activities on or within Outstanding Natural Features or Landscape	Support	Seeks to retain as notified.	Seeks to amend the definition of commercial activities and seeks to add a permitted activity criteria specifically for temporary events, or an advice note advising that the Temporary Events chapter overrides NFL-R7.
292.192	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-R9 Flood protection structures and flood protection works on or within Outstanding Natural	Support	Supports with modification to allow all people, not just councils, to undertake flood protection works.	Seeks deletion of PER-1 If retained, seeks to add a note to advise that emergency works are permitted under the RMA.
292.193	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-R10 Plantation Forestry within or on Significant Natural Features or Rural Scenic Landscap	Support	Seeks to retain as notified.	Seeks deletion of PER-1 If retained, seeks to add a note to advise that emergency works are permitted under the RMA.
292.194	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-R11 Mining activities and/or quarrying activities (excluding existing farm quarries) withi	Support	Supports with modifications to protect existing quarrying and mining activities. [refer to original submission]	Seeks to amend as follows: Mining activities and/or quarrying activities (excluding existing ~~farm quarries~~ quarrying activity) within or on Significant Natural Features or Rural Scenic Landscapes [refer to original submission for full relief sought]
292.195	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-R12 Mining activities and/or quarrying activities (excluding existing farm quarries) on or	Support	Supports with modifications to protect existing quarrying and mining activities. [refer to original submission]	Seeks to amend as follows:

						Mining activities and/or quarrying activities (excluding existing ~~farm quarries~~ quarrying activity) within or on Significant Natural Features or Rural Scenic Landscapes [refer to original submission for full relief sought]
292.196	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-R13 Intensive indoor primary production and intensive outdoor primary production within or	Oppose	Opposes in part and considers restricted discretionary status is more appropriate instead of non-complying as parts of the RSL may be appropriate, particularly where land is already irrigated and developed.	Seeks to amend NFL-R13 from non-complying activity status to restricted discretionary with the matters of discretion being the same as NFL-R10.
292.197	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-R14 Plantation Forestry on or within Outstanding Natural Features or Landscapes All	Support	No specific reason given.	Seeks to retain as notified.
292.198	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-R15 Planting species that can result in wilding conifers on or within Outstanding Natural	Support	No specific reason given.	Seeks to retain as notified.
292.199	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-R16 Intensive indoor primary production and intensive outdoor primary production on or wit	Support	No specific reason given.	Seeks to retain as notified
292.200	Robert and Sylvia Borst	Natural Features and Landscapes	NFL-S1 Standards for colours of buildings and structures in landscapes Buildings and st	Support	No specific reason given.	Seeks to retain as notified.
292.201	Robert and Sylvia Borst	Public Access	PA-O1 Public and customary access Public and customary access is protected, maintained,	Support	No specific reason given.	Seeks to retain as notified.
292.202	Robert and Sylvia Borst	Public Access	PA-O2 Provision of public access minimises adverse effects Public access to and along t	Support	No specific reason given.	Seeks to retain as notified.
292.203	Robert and Sylvia Borst	Public Access	PA-P1 Activities that protect and maintain public and customary access Enable activitie	Support	No specific reason given.	Seeks to retain as notified.
292.204	Robert and Sylvia Borst	Public Access	PA-P2 Mechanisms for improving public access Protect, maintain and enhance public acces	Oppose	Opposes in part the policy encouraging public access opportunities in land use applications but considers it is too ambiguous without rules and could pressure applicants and suggests limiting to esplanade reserves/strips where appropriate through a subdivision process.	Seeks to amend as follows: Protect,maintainand enhance public access by: ~~1. encouraging opportunities and mechanisms to maintain and enhance public access when a land use application provides an opportunity for access; and~~ ~~2.~~1. requiring the creation of esplanade reserves and esplanade strips where appropriate in accordance with the Subdivision Chapter, ~~with priority given~~along the waterways listed in SCHED11

						– Priority Areas for Public Access and Esplanade Strips, and lakes larger than 8 hectares.
292.205	Robert and Sylvia Borst	Public Access	PA-P3 Consideration of adverse effects on public access When considering any applicatio	Support	Supports the policy but considers it should apply only to public land, not private land.	Seeks to amend as follows: When considering any application for resource consents, have regard to any adverse effects of the proposed activity on public access routes and access points <u>on public land.</u>
292.206	Robert and Sylvia Borst	Activities on the Surface of Water	General	Support	General support for the chapter.	Seeks to retain as notified - except for submission points that follow.
292.207	Robert and Sylvia Borst	Activities on the Surface of Water	ASW-P2 Commercial activities Provide for commercial surface water activities where it can	Support	Supports the policy for commercial activities on water, with a request to redefine 'commercial activities' as submitted in the definitions chapter.	Seeks to redefine 'commercial activities' as submitted.
292.208	Robert and Sylvia Borst	Activities on the Surface of Water	ASW-R1 Use of vessels for a recreational activity All zones Activity status: Permitted	Amend	Considers that prescribed noise limits for vessels may create reverse sensitivity for recreational lake use as houses are built nearby and suggests protecting existing uses.	Seeksto amend as follows: PER-2 The following noise limits are not exceeded at a notional boundary established prior to 1st March 2025:
292.209	Robert and Sylvia Borst	Light	General	Support	Support for the chapter.	Seeks to retain as notified.
292.210	Robert and Sylvia Borst	Noise	General	Support	No specific reasons given	Retain as notified
292.211	Robert and Sylvia Borst	Signs	General	Support	General support for the chapter.	Seeks to retain as notified except for the submission points that follow.
292.212	Robert and Sylvia Borst	Signs	SIGN-R7 Signs attached to a trailer, vehicle or vessel All zones Activity status: Non	Amend	Considers that the rule controlling signs on vehicles/trailers is ambiguous and may cause arbitrary decision-making and suggests clarifying exemptions for company vehicles and business operations.	Seeks to amend as follows: This rule does not apply to: 1.~~an advertising~~sign painted or adhered directly onto company/fleet vehicles or trailers ~~which is incidental to the primary use of that vehicle or trailer;~~or 2. an advertising sign painted or adhered directly onto company/fleet vehicles or trailers ~~which are used in the day-to-day operation of that business~~; or 3. businesses operating from a vehicle. ~~truck or caravan such as food vendors.~~
292.213	Robert and Sylvia Borst	Temporary Activities	General	Support	Support for chapter with modification to remove the word 'light' from 'light aircraft' as this is not defined. Also refer to submission point on definitions chapter related to 'temporary activities'.	Seeks to replace 'helicopter' and 'light aircraft' with 'aircraft' throughout the chapter.

292.214	Robert and Sylvia Borst	Temporary Activities	TEMP-R6 Temporary helicopter and light aircraft take-offs and landings, excluding Ōamaru Airpo	Support	Considers that 'helicopter' is not a defined term and should be replaced with 'aircraft' [refer to submission point on definitions chapter related to 'temporary activities']	Seeks to replace ‘helicopter’ and ‘light aircraft’ with ‘aircraft' throughout the chapter.
292.215	Robert and Sylvia Borst	General Rural Zone	GRUZ-O1 Purpose of the General Rural Zone The General Rural Zone provides for primary p	Support	Support the purpose of the general rural zone for primary production and that the rural zone provides vital socio-economic benefits to the District.	Retain as notified
292.216	Robert and Sylvia Borst	General Rural Zone	GRUZ-O2 Character of the General Rural Zone The character of the General Rural Zone rem	Support	Support while recognising that odours are managed by the regional council. Support that primary production contributes to open character and maintenance of rural landscapes, and that a degree of built form is necessary to support the ongoing productivity of the rural zone.	Retain as notified
292.217	Robert and Sylvia Borst	General Rural Zone	GRUZ-O3 Highly productive land The value and long-term benefits of using highly product	Support	Support - managing highly productive land is important to retain and support primary production in the rural environment, particularly where land is identified as being highly productive.	Retain as notified
292.218	Robert and Sylvia Borst	General Rural Zone	GRUZ-O4 Rural amenity values A range of activities anticipated in the General Rural Zon	Support	Support for objective but considers there should be clearer guidance or a definition of rural amenity values.	Seeks to define 'rural amenity values' as follows: include open space, primary production, low population and building density, pastoral and arable character interspersed with indigenous biodiversity, relative quietness compared to urban areas, and connection to land for cultural, recreational and historic reasons.
292.219	Robert and Sylvia Borst	General Rural Zone	GRUZ-O5 Business development in rural areas Rural areas are retained for primary produc	Support	Support - recognition is important for enabling appropriate rural-based business activities that complement the zone’s purpose.	Retain as notified
292.220	Robert and Sylvia Borst	General Rural Zone	GRUZ-P1 Protection of highly productive land Protect highly productive land for use by	Support	Support - important that identified highly productive land is protected for primary production.	Retain as notified
292.221	Robert and Sylvia Borst	General Rural Zone	GRUZ-P2 Development in the General Rural Zone Maintain the rural character in the Gener	Support	Support for intent to maintain rural character while allowing flexibility for ancillary activities and existing uses, encouraging appropriate indigenous planting, and enabling quality staff housing and additional dwellings and recognising the diverse residential needs of rural operations without compromising housing standards.	Seeks to amend as follows: ... 4. encouraging the maintenance and enhancement of existing, and the planting of new, indigenous vegetation where appropriate; and 5. providing for conservation activities; and 6. recognising and providing for lawfully established rural activities and minimising reverse sensitivity effects on primary production and ancillary activities of new development in the General Rural Zone; and 7. providing for a ~~single~~minor residential unit on sites to facilitate residential choice and flexibility ~~while ensuring that the minor residential unit is subservient to the principal residential unit on~~

						~~the site.~~ 8. providing for multiple residential units on large sites tofacilitatestaff accommodation while ensuring building density isappropriate forthe General Rural Zone.
292.222	Robert and Sylvia Borst	General Rural Zone	GRUZ-P3 Design of development in rural areas Ensure that new development is well design	Support	Support for intent to ensure new development is appropriate for the environment and buildings and structures are necessary to support primary production.	Retain as notified
292.223	Robert and Sylvia Borst	General Rural Zone	GRUZ-P4 Maintenance of clear urban, rural lifestyle and rural areas Maintain a clear di	Support	Support intent where there is a distinguishment of urban and rural environments but encourage flexibility for primary production activities on the rural fringe where adverse effects can be appropriately managed.	Seeks to amend as follows: Maintain a clear distinction between urban, rural lifestyle and rural areas through the use of clear land use zones and avoidance of ad-hoc subdivision where growth to Settlement or Rural Lifestyle zones has not been planned for unless the adverse effects can be avoided, remedied or mitigated.
292.224	Robert and Sylvia Borst	General Rural Zone	GRUZ-P5 Intensive primary production Provide for intensive indoor primary production an	Support	Support as important that provision is made for intensive primary production in the rural zone where effects can be appropriately managed.	Retain as notified
292.225	Robert and Sylvia Borst	General Rural Zone	GRUZ-P6 Integration of primary production with natural and cultural values Recognise th	Support	Support but seeks clarification that sensitive values do not apply across the entire GRUZ zone and recommend limiting specialist reports to identified overlays, and advocate for enabling new primary production activities.	Seeks to amend as follows: Recognise the importance of the identified landscape, heritage, biodiversity and mana whenua values and provide for continued and new primary production in these areas while avoiding, remedying or mitigating any adverse effects on the values.
292.226	Robert and Sylvia Borst	General Rural Zone	GRUZ-P7 Intensive primary production and extractive industries in close proximity to settlemen	Support	Support intent that any new primary production and extractive industries avoid adverse effects on existing settlements.	Retain as notified
292.227	Robert and Sylvia Borst	General Rural Zone	GRUZ-P8 Energy and resource efficiency Encourage minimisation of energy and water use a	Support	Support intent to promote energy and resource efficiency where appropriate but notes that the Energy chapter lacks sufficient permissiveness to effectively implement the policy.	Seeks to amend as follows: Encourage minimisation of energy and water use and the use of low impact design such as optimalsite layout, passive solar design, solar power and water heating, and greywater recycling for any new development, where appropriate.
292.228	Robert and Sylvia Borst	General Rural Zone	GRUZ-P9 Outline Development Plans Provide for any substantial development extension of	Support	Support with clarification that recreational, heritage, and ecological values should be limited to those identified in the plan toavoid unnecessary reporting, and suggest using covenants or separation distances to manage adverse effects on new dwellings near the General Rural Zone.	Seeks to amend as follows: ... c. retains and supports the relationship to, and where possible enhances, identified recreational, heritage and ecological features and values; and d. is co-ordinated with the delivery of appropriate infrastructure; and

						e. achieves a high level of amenity; and f. specifies covenants and/or provides a sufficient separation distance of habitable buildings with the General Rural Zone to minimise the potential for reverse sensitivity effects.
292.229	Robert and Sylvia Borst	General Rural Zone	GRUZ-R1 Building activity General Rural Zone Activity status: Permitted Where: PER-	Support	Support rule to provide for building activity in the rural zone and default to restricted discretionary where compliance cannot be achieved.	Seeks to retain as notified.
292.230	Robert and Sylvia Borst	General Rural Zone	GRUZ-R2 Primary production (excluding carbon forestry otherwise provided for in GRUZ-R18, mini	Support	Support rule advocating for the protection of existing mining and quarrying activities in the General Rural Zone, and affirm that primary production is appropriately located within this zone.	Seeks to amend as follows: Primary production (excluding carbon forestry otherwise provided for in GRUZ-R18, new mining activity, new quarrying activities, new intensive indoor primary production and new intensive outdoor primary production)
292.231	Robert and Sylvia Borst	General Rural Zone	GRUZ-R3 Amenity planting and shelterbelts General Rural Zone Activity status: Permitt	Support	Support with amendments to clarify that PER-1 may overly restrict amenity planting due to broad pest species criteria, and that PER-2 should regulate actual effects rather than speculative ones.	Seeks to amend as follows: PER-1 The amenity planting or shelterbelt does not involve planting of species that are, ~~or can become,~~ pest species as identified in any Regional Pest Management Plan; and PER-2 The amenity planting ~~will~~ does not shade any existing adjoining residential unit between the hours of 9:00am and 4:00pm, or any formed public road between 10:00am and 2:00pm, on the shortest day of the year; and...
292.232	Robert and Sylvia Borst	General Rural Zone	GRUZ-R4 Residential activity General Rural Zone Activity status: Permitted Activity	Support	No specific reason given	Retain as notified
292.233	Robert and Sylvia Borst	General Rural Zone	GRUZ-R5 Residential unit General Rural Zone Activity status: Permitted Where: PER-1	Support	No specific reason given	Retain as notified
292.234	Robert and Sylvia Borst	General Rural Zone	GRUZ-R6 Accessory building General Rural Zone Activity status: Permitted Activity s	Support	No specific reason given	Retain as notified
292.235	Robert and Sylvia Borst	General Rural Zone	GRUZ-R7 Minor residential unit General Rural Zone Activity status: Permitted Where:	Support	Support in part, recommending it apply only to smaller sites, with staff housing for larger farms permitted through other provisions to ensure adequate and appropriate accommodation for rural workers.	Retain as notified
292.236	Robert and Sylvia Borst	General Rural Zone	GRUZ-R8 Visitor accommodation General	Support	Support but recommend amending the five-person limit to better reflect actual building capacity and accommodate larger groups,	Seeks to amend as follows:

			Rural Zone Activity status: Permitted Where:		such as tour parties, where adverse effects can be appropriately managed.	PER-1 The visitor accommodation is limited to homestays accommodating no more than ~~5~~10 visitors at any one time; and
292.237	Robert and Sylvia Borst	General Rural Zone	GRUZ-R9 Home business (excluding primary production activity) General Rural Zone Acti	Support	Support for enabling employment and entrepreneurialism in the rural zone, noting that effects like noise and visual impact are typically well managed through existing provisions, and recommend flexibility for outdoor storage and activities, with screening requirements clearly defined and not overly restrictive.	Seeks to amend as follows: ~~PER-1No more than 40m2 of the gross floor area of all buildings on the site is used for the home business; and~~ ~~PER-2~~PER-1 No more than one full time employee, or equivalent, ~~engaged in~~ working at the site of the home business, resides off-site; and ~~PER-3~~PER-2 No more than 2 heavy vehicle movements, and a total of 20 vehicle movements are generated in a 24-hour period for the home business; and ~~PER-4~~PER-3 Any on-site storage of materials associated with the home business is undertaken within buildings on the site or is screened to a height of at least 1.2m from adjoining roads and sites; and ~~PER-5~~PER-4 The manufacturing, altering, repairing, dismantling or processing of any goods, or articles associated with the home business, take place within a building or is screened to a height of at least 1.2m from adjoining roads and sites.
292.238	Robert and Sylvia Borst	General Rural Zone	GRUZ-R10 Intensive indoor primary production and intensive outdoor primary production G	Support	Support with modifications to avoid duplication of effluent consent requirements already managed by the Regional Council and recommend aligning any remaining provisions with RegionalCouncil's150m notification threshold.	Seeks to amend as follows: PER-2 1. housed pigs are located no closer than 500m to a property boundary; and ~~2. no disposal or storage of effluent within 500m of a residential unit on any other site; and~~ 3. no intensive indoor primary production or intensive outdoor primary production of pigs occurs within ~~2 kilometres~~150m of a Residential, Settlement, or Open Space Zone; or PER-3 ... ~~2. no disposal or storage of effluent within 500m of a residential unit on any other site; and~~ 3. no intensive indoor primary production or intensive outdoor primary production of poultry occurs within ~~2 kilometres~~ 150m of a Residential, Settlement or Open Space Zone; or PER-4 For intensive indoor primary production or intensive outdoor primary production of any other species, there is:

						~~1. no disposal or storage of effluent within 500m of a residential unit on any other site; and~~ 2. a setback of at least ~~2 kilometres~~ 150m from a Residential, Settlement or Open Space Zone.
292.239	Robert and Sylvia Borst	General Rural Zone	GRUZ-R11 Recreational activity General Rural Zone Activity status: Permitted Activi	Support	No specific reasons given	Retain as notified
292.240	Robert and Sylvia Borst	General Rural Zone	GRUZ-R12 Flood protection structures General Rural Zone Activity status: Permitted	Support	No specific reasons given	Retain as notified
292.241	Robert and Sylvia Borst	General Rural Zone	GRUZ-R13 Conservation activities General Rural Zone Activity status: Permitted Acti	Support	No specific reasons given	Retain as notified
292.242	Robert and Sylvia Borst	General Rural Zone	GRUZ-R14 Commercial activity General Rural Zone Activity status: Permitted Where: P	Support	Support with amendments to allow farm shops to sell a broader range of locally produced primary goods, ideally within a 100km radius, while maintaining rural character and avoiding expansion into general retail.	Seeks to amend as follows: PER-1 Retail sales are limited to: 1. food sourced from primary production activities within a 100km radius of the site ~~farming produce (including milk, fruit, vegetables, plants, flowers, or eggs) produced on the site, or honey processed on the site; or~~
292.243	Robert and Sylvia Borst	General Rural Zone	GRUZ-R15 Aeroplane airstrips and helicopter landing areas, and the use of these by aircraft	Oppose	Considers that the aircraft movement limit should be increased to 32 per month for flexibility, and that no limit should apply where sufficient setbacks ensure there are no adverse effects at the nearest boundary.	Seeks to amend as follows: PER-3 The use of the landing area or airstrip is for any other activity which results in no more than ~~8 aircraft movements per week (4 take-offs and 4 landings)~~32 aircraft movements per month; or PER-4 The airstrip is more than 1,000m from the nearest notional boundary under different ownership; or ...
292.244	Robert and Sylvia Borst	General Rural Zone	GRUZ-R16 Papakāika within land held under Te Ture Whenua Māori Act 1993 or within a Native Res	Support	No specific reasons given	Retain as notified
292.245	Robert and Sylvia Borst	General Rural Zone	GRUZ-R17 Seasonal Worker accommodation General Rural Zone Activity status: Permit	Oppose	Supports the need for seasonal worker housing but oppose limitations that encourage sub-standard accommodation, advocating instead for flexible, self-contained, and higher-quality options that respect the dignity and needs of workers.	Seeks to amend as follows: PER-1 The minor residential unit or building ~~and/or any campsite~~is only to be used by workers employed on the site; and PER-2 The seasonal worker accommodation is located on a site that is a minimum of 20ha; and ~~PER-3~~

						~~Any building is relocatable or able to be reconfigured to a building accessory to land-based primary production; and~~ ~~PER-4~~ ~~Any seasonal worker accommodation contains no more than one kitchen facility; and~~ PER-5 ~~Any building used for seasonal worker accommodation is no more than 125m2 gross floor area; and~~ PER-6 Any building used for seasonal worker accommodation provides for a maximum of 10 occupants; and ~~PER-7~~ ~~The maximum area used for camping as part of any seasonal worker accommodation shall be 1000m2 and be located at least 100m from any residential unit on an adjoining site.~~
292.246	Robert and Sylvia Borst	General Rural Zone	GRUZ-R18 Carbon forestry General Rural Zone Activity status: Permitted Where: PER-1	Support	Support with modifications to permit suitable indigenous species for carbon forestry, align setback rules with biodiversity provisions, correct wording around pest species, and remove unnecessary restrictions that conflict with broader plan objectives to enhance native biodiversity.	Seeks to amend as follows: PER-1 The species of planting are indigenous ~~to the ecological district in which the activity is to take place;~~and ... PER-4 ~~4. within 10m of a Significant Natural Area; and~~ PER-5 The carbon forestry activity ~~does not involve the planting~~ avoids an increase in scale or intensity of any pest, pest agent, or organism of interest identified in the relevant Regional Pest Management Plan; and ~~PER-6~~ ~~The carbon forestry utilises no more than 50% of any site.~~
292.247	Robert and Sylvia Borst	General Rural Zone	GRUZ-R19 Rural Industry General Rural Zone Activity status: Restricted Discretion	Support	Support with more permissive settings to reflect the functional and operational needs of rural industries, noting that site design and infrastructure are developer decisions and that adverse effects are already managed through other chapters in the plan.	Seeks to amend as follows: Activity status: ~~Restricted Discretionary~~ Permitted Where: PER-1 The activity is not a potentially high-impact industrial activity. Note: consent may be required under the Transport chapter.

						~~Matters of discretion are restricted to:~~ ~~1. the suitability of the location, site design and layout; and~~ ~~2. the intensity and scale of the activity; and~~ ~~3. the extent of adverse effects on existing or permitted activities; and~~ ~~4. the extent of adverse effects on the safe and efficient operation of the road network, and suitability of onsite loading, manoeuvring and access; and~~ ~~5. the provision of infrastructure to service the activity.~~
292.248	Robert and Sylvia Borst	General Rural Zone	GRUZ-R20 Papakāika where not otherwise provided for under GRUZ-R16 General Rural Zone	Support	No specific reasons given	Retain as notified
292.249	Robert and Sylvia Borst	General Rural Zone	GRUZ-R21 Community facility General Rural Zone Activity status: Discretionary Activ	Support	No specific reasons given	Retain as notified
292.250	Robert and Sylvia Borst	General Rural Zone	GRUZ-R22 Industrial activity General Rural Zone Activity status: Discretionary Acti	Support	No specific reasons given	Retain as notified
292.251	Robert and Sylvia Borst	General Rural Zone	GRUZ-R23 Any other activity not provided for as a permitted, restricted discretionary, non-com	Support	No specific reasons given	Retain as notified
292.252	Robert and Sylvia Borst	General Rural Zone	GRUZ-R24 Retirement village General Rural Zone Activity status: Non-Complying Activ	Support	No specific reasons given	Retain as notified
292.253	Robert and Sylvia Borst	General Rural Zone	GRUZ-R25 Educational facility General Rural Zone Activity status: Non-Complying Act	Oppose	Opposes the non-complying activity status for schools in rural zones and considers that their rural character typically minimises reverse sensitivity risks and that access to education should be balanced with protecting primary production.	Seeks to amend the activity to a permitted activity with appropriate setbacks for buildings for the educational facility or restricted discretionary.
292.254	Robert and Sylvia Borst	General Rural Zone	GRUZ-S1 Residential site density The maximum density of residential units on any site	Support	No specific reasons given	Retain as notified
292.255	Robert and Sylvia Borst	General Rural Zone	GRUZ-S2 Maximum height All building and structures must not exceed a maximum height of	Support	Support GRUZ-S2 with amendment to reflect that grain silos can be up to 25m in height.	Seeks to amend as follows: 1. All building and structures must not exceed a maximum height of:

						... 2.~~15m~~ 25m for grain silos; ...
292.256	Robert and Sylvia Borst	General Rural Zone	GRUZ-S3 Building coverage The building coverage for any site shall not exceed 20%. Rai	Support	No specific reasons given	Retain as notified
292.257	Robert and Sylvia Borst	General Rural Zone	GRUZ-S4 Road and rail setbacks A stock loading ramp or race with its entry/exit point	Support	Support with modification to allow stock loading ramps angled to the road, provided there is at least 30m of space to accommodate full off-road parking and manoeuvring.	Seeks to amend as follows: 1. A stock loading ramp or race with its entry/exit point located facing a road, including a State Highway, shall not be located within ~~a~~30m ~~setback~~from the road boundary in the direction the loading ramp faces. 2. A stock loading ramp or race with its entry/exit point running parallel or away from~~to~~ the road is exempt from this standard.
292.258	Robert and Sylvia Borst	General Rural Zone	GRUZ-S5 Internal boundary setbacks The minimum setback of any part of a building or str	Support	No specific reason given	Retain as notified
292.259	Robert and Sylvia Borst	General Rural Zone	GRUZ-S6 Frontage fencing Any fencing within a road boundary setback or internal bounda	Support	Support with modification to exempt the curtilage of residential andminor residential units, allowing more residential-style fencing around homes while retaining appropriate rural fencing elsewhere in the zone.	Seeks to amend as follows: 1. Any fencing within a road boundary setback or internal boundary setback shall be post and netting, post and wire, or post and rail fencing. 2. Fencing of residential units and minor residential units is exempt from this standard.
292.260	Robert and Sylvia Borst	General Rural Zone	GRUZ-S7 Crop protection structures Dark green or black cloth is used for all vertical	Oppose	Considers there should be justification for colour and size restrictions.	Seeks to delete or provide evidence or justification for colour and size restrictions.
292.261	Robert and Sylvia Borst	General Rural Zone	GRUZ-S8 Hours of operation Any activity (other than a residential activity or visitor	Support	Support intent to limit hours for rural amenity protection but considers the matters of discretion should also address potential reverse sensitivity effects on primary production activities.	Seeks to amend as follows: Matters of discretion are restricted to: ... 2. any adverse effects on the amenity values of properties on any adjoining residential sites; and 3. any reverse sensitivity effects on primary production.
292.262	Robert and Sylvia Borst	General Rural Zone	GRUZ-S9 Servicing and firefighting water supply and access All new buildings must be c	Oppose	Oppose in part, supporting its intent to ensure buildings are appropriately serviced but recommending flexibility for farm and accessory buildings that do not require reticulated services to avoid unrealistic expectations.	Seeks to amend as follows: 1. All new residential buildings must be connected to reticulated services where these are available; and 2. All new residential buildings must comply with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PA 4509:2008 unless written approval is provided from Fire and Emergency New Zealand regarding an alternative firefighting water supply.

292.263	Robert and Sylvia Borst	Transport	TRAN-O1 On-site transport facilities and access Use and development has safe and effective	Support	No specific reason given	Retain as notified
292.264	Robert and Sylvia Borst	Transport	TRAN-O2 High trip generating use and development The safety and efficiency of the transpor	Support	No specific reason given	Retain as notified
292.265	Robert and Sylvia Borst	Transport	TRAN-O3 Transport network The transport network is effective, accessible and integrated	Support	No specific reason given	Retain as notified
292.266	Robert and Sylvia Borst	Transport	TRAN-P1 High trip generating use and development Provide for high vehicle trip generato	Support	Support with modification to clarify the term 'surrounding area' in Point 5, as it is currently vague and may lead to inconsistent interpretation.	Seeks to amend as follows: ... 5. the effect of the proposed activity on the character and amenity values of the surrounding ~~area~~adjoining sites; and ...
292.267	Robert and Sylvia Borst	Transport	TRAN-P2 Appropriate on-site transport facilities Enable on-site transport facilities where	Oppose	Opposes the policy as it addresses only on-site effects and considers that internal site use is typically managed by landowners and industry standards, and that provisions should focus on impacts beyond the site to align with TRAN-O1 and avoid unnecessary safety risks.	Seeks to amend as follows: Enable on-site transport facilities where these: 1. meet industry standards; and 2. are of a location and design that provides for: a. public health and safety; and ~~b. the safe and efficient use of the site; and~~ c. the safe and efficient functioning of the transport network; and d. the reasonable loading and access demands generated by the use of the site; and e. the safe and effective access for firefighting purposes. ~~3. promote the uptake and use of the active transport network.~~
292.268	Robert and Sylvia Borst	Transport	TRAN-P3 Potentially appropriate on-site transport facilities Only allow for on-site tra	Oppose	Considers the policy unnecessary as relevant matters are already addressed unless they regulate internal effects. Considers it should focus solely on firefighting access and remove provisions targeting off-site effects.	Amend as follows: Only allow for on-site transport facilities that do not meet industry standards where it can be demonstrated, if applicable, that: ~~1. the design is in response to site and/or topographical constraints; and~~
292.269	Robert and Sylvia Borst	Transport	TRAN-P4 Vehicle crossings Provide for safe and efficient connections between the transp	Support	Support to the extent that it applies to new vehicle crossings.	Seeks to amend as follows: Provide for safe and efficient connections between the transport network and on-site transport facilities by requiring new vehicle crossings to roads to address:

						...
292.270	Robert and Sylvia Borst	Transport	TRAN-P5 Regionally Significant Infrastructure Recognise the social, economic, cultural	Support	Support, particularly the definition of Regionally Significant Infrastructure.	Retain as notified
292.271	Robert and Sylvia Borst	Transport	TRAN-P6 Multi-modal and active transport Encourage activities to incorporate opportunitie	Oppose	Considers to be overly strong in wording and that cycling/pedestrian modes are more hazardous and should not be encouraged where full cycling infrastructure is not available.	Seeks to amend as follows: ~~Encourage~~Promote activities to incorporate opportunities for multi-modal and active transport, including cycle parking and end of trip facilities if the site is served by the active transport network where it separates cyclists and pedestrians.
292.272	Robert and Sylvia Borst	Transport	TRAN-P8 Upgrading of the transport network Provide for the upgrading or development of	Support	Considers clearer guidance needed on when to respond to earthworks effects, suggesting the policy be limited to landscape and ecological values identified in overlays and chapters of the plan.	Seeks to amend as follows: ... 8. responds to site and topographical constraints including opportunities to reduce the effects of earthworks on identified landscape and ecological values; ...
292.273	Robert and Sylvia Borst	Transport	TRAN-P9 Roads as infrastructure corridors Encourage the use of roads as infrastructure	Support	No specific reason given	Retain as notified
292.274	Robert and Sylvia Borst	Transport	TRAN-P10 Road classification Classify roads according to their function and anticipated	Support	No specific reason given	Retain as notified
292.275	Robert and Sylvia Borst	Transport	General	Oppose	Considers that rural zones should be exempt from policies that may pressure developers to fund cycle and footpaths where they offer no practical benefit and seeks clarification that policies apply only to new activities, noting that technical evidence from the WDC roading department is needed to support provisions for road crossings.	Seeks to have submission points considered across all TRAN provisions and for the roading department to reply to this submission at further hearings commenting on the TRAN chapter overall.
292.276	Robert and Sylvia Borst	Transport	TRAN-R1 Vehicle crossings onto roads All zones Activity status: Permitted Where: PE	Support	Support for new vehicle crossings subject to submission point*298.276*. [*list previous submission point #]	Seeks to amend as follows: TRAN-R1 New Vehicle crossings onto roads
292.277	Robert and Sylvia Borst	Transport	TRAN-R2 Site access for activities without any on-site vehicle parking space or loading spaces	Support	Support with modifications to clarify that pedestrian and cycling access requirements should not apply in zones where vehicle travel is operationally necessary, such as due to distance.	Seeks to amend as follows: TRAN-R2 Site access for new activities without any on-site vehicle parking space or loading spaces

						PER-1 All of the following standards are complied with where relevant: 1. TRAN-S1 Pedestrian and cycling access in Residential Zones. 2. TRAN-S2 Firefighting access
292.278	Robert and Sylvia Borst	Transport	TRAN-R3 On-site parking, loading, and access All zones Activity status: Permitted W	Oppose	Considers the provision overregulates internal site effects unrelated to the transport network, particularly dairy lanes and private access already covered under TRAN-S3 and finds TRAN-S5 overly restrictive by limiting vehicle standing, queuing, and manoeuvring within a site that are inherent and internal and should not be subject to standards.	Seeks to deleteTRAN-S7 and TRAN-S8 from the rule.
292.279	Robert and Sylvia Borst	Transport	TRAN-S9 Accessible parking spaces Where parking spaces are provided on site: any on-si	Support	Support subject to submissions from disability advocate organisations, particularly with reference to rural sites.	Retain as notified
292.280	Robert and Sylvia Borst	Transport	TRAN-S10 Design requirements for on-site vehicle parking spaces Where parking spaces ar	Oppose	Considers the managing of internal site effects inconsistent with TRAN-O1 and recommends it be amended to clarify that it does not apply to rural or residential zones.	Seeks to provide clarification that the standard does not apply to rural and residential zones.
292.281	Robert and Sylvia Borst	Transport	TRAN-S11 Surface of parking and loading areas The surface of all parking and loading a	Oppose	Considers that setting a low car park threshold would place undue burden on rural zones, and that regulating internal site effects is inconsistent with TRAN-O1.	Seeks to provide clarification that the standard does not apply to rural and residential zones.
292.282	Robert and Sylvia Borst	Transport	TRAN-S12 On-site cycle parking All developments, excluding residential units and prima	Amend	Considers that while TRAN-S12 excludes primary production, it should also exclude rural zones due to long travel distances and lack of separated cycleways, noting that many related standards are similarly irrelevant in rural contexts.	Seeks to provide clarification that the standard does not apply to rural zones.
292.283	Robert and Sylvia Borst	Transport	TRAN-S12 On-site cycle parking All developments, excluding residential units and prima	Oppose	Considers standard to be overly prescriptive regarding the standard of cycle parking.	Seeks to provide clarification that the standard does not apply to rural and residential zones
292.284	Robert and Sylvia Borst	Transport	TRAN-R3 On-site parking, loading, and access All zones Activity status: Permitted W	Oppose	Opposes incorporating Australian and New Zealand Standards by reference in the district plan due to their cost, copyright restrictions, external review processes, and inefficiency and considers the PDP should include locally specified standards to avoid financial barriers and regulatory outsourcing.	Seeks to use standards acceptable to the WDC roading department which are written into the plan to be freely available. Delete TRAN-R3. Alternatively, if retained sees to amend as follows All zones except Rural Lifestyle Zone, General Rural Zone, Macraes Mining Zone and Settlement Zone. PER-1 All of the following standards are complied with where relevant; 1. TRAN-S2 Firefighting access; ~~2. TRAN-S3 Service lanes, private ways, private roads, pedestrian accessways and walkways;~~ ~~3. TRAN-S4 Reverse manoeuvring;~~ ~~4. TRAN-S5 Design standards for vehicle manoeuvring areas;~~

						5. TRAN-S6 Service stations and truck stops; ~~6. TRAN-S7 On-site loading spaces for non-residential activities;~~ ~~7. TRAN-S8 Design requirements for loading and vehicle standing spaces;~~ 8. TRAN-S9 Accessible parking spaces; ~~9. TRAN-S10 Design requirements for on-site vehicle parking spaces;~~ ~~10. TRAN-S11 Surface of parking and loading areas;~~ ~~11. TRAN-~~S12 On-site cycle parking. Matters of discretion are restricted to: 1. the matters of discretion listed in any of the standards TRAN-S2,~~TRAN-S3, TRAN-S4, TRAN-S5~~, TRAN-S6,~~TRAN-S7, TRAN-S8~~,TRAN-S9, ~~TRAN-S10, TRAN-S11, and/or TRAN-S12~~that are not complied with.
292.285	Robert and Sylvia Borst	Transport	TRAN-R4 Vehicle trip generating activities All zones Activity status: Permitted Whe	Support	Supports with changes to reduce the consent threshold and controlling the activity directly by the number of traffic movements rather than using proxies like gross floor area.	Retain as notified with changes to Table 6 - High Trip Generator Thresholds.
292.286	Robert and Sylvia Borst	Transport	TRAN-R5 Walkways, cycleways and shared paths which are located on public land other than a roa	Support	Support with amendment to replace the Austroads Guide with a specific standard to ensure oversight of future changes is under WDC control.	Seeks to retain as notified with changes to TRAN-S20.
292.287	Robert and Sylvia Borst	Transport	TRAN-R6 Extensions and new vehicle access tracks ancillary to infrastructure, outside of any o	Support	Support with amendment to apply within overlays as extensive coverage of the Rural Scenic and Outstanding Natural Landscapes overlays makes it overly restrictive if excluded and considers infrastructure access should take precedence over overlay values without requiring consent or incurring additional costs.	Seeks to amend as follows: TRAN-R6 Extensions and new vehicle access tracks ancillary to infrastructure, ~~outside of any overlay~~
292.288	Robert and Sylvia Borst	Transport	TRAN-S3 Service lanes, private ways, private roads, pedestrian accessways and walkways	Support	Support if restricted to public ways only and specifies a standard rather than requiring purchase of the standard.	Seeks to amend as follows: TRAN-S3 Service lanes, ~~private ways, private roads,~~pedestrian accessways and walkways <u>on public land</u>. 1. Service lanes, private ways, private roads, pedestrian accessways and walkways on public land must be designed and constructed in accordance with[describe standards here] ~~NZS 4404:2010 Land Development and Subdivision Infrastructure; except where Table 7 Minimum legal widths and formation requirements for private ways/vehicle access lots replaces the formation requirements of private ways for residential units detailed in NZS 4404:2010.~~
292.289	Robert and Sylvia Borst	Transport	TRAN-S5 Design standards for vehicle manoeuvring areas Areas must be provided on a sit	Oppose	Considers the standard overly restrictive by requiring all vehicle standing, queuing, and manoeuvring to occur entirely within a site, including areas inherently used for such purposes, making on-	Seeks to delete the standard. Alternatively, seeks to amend as follows:

					street parking non-compliant and imposing internal site controls unrelated to TRAN-O1.	1. Areas must be provided on a site for vehicles to stand, queue and make all necessary manoeuvres on site without using the road or State Highway, ~~and without~~using the area provided for parking space, servicing, loading space or outdoor storage ~~purposes;~~ and ...Matters of discretion are restricted to: 1. the safety and movement of pedestrians, cyclists, public transport and general traffic <u>on the road corridor.</u>
292.290	Robert and Sylvia Borst	Transport	TRAN-S7 On-site loading spaces for non-residential activities The number of loading sp	Oppose	Considers the standard inappropriate for rural contexts and that it imposes unnecessary discretion over loading needs best determined by the operator. Also considers that it relies on outdated and inaccessible standards and should instead include explicit provisions within the plan.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. The number of loading spaces for any non-residential activity must not be less than that shown in Table 8 – Minimum loading space requirements for non-residential activities below and must be provided on-site, except in the Town Centre Zone <u>and rural zones</u>. ... 3. Neither Clause 1 or 2 above apply to sites of less than 50m2 that are used for infrastructure purposes, or <u>to primary production.</u> Matters of discretion are restricted to: 1. the effective, efficient and safe operation of the transport network; and ~~2. the identified loading needs of the activity.~~
292.291	Robert and Sylvia Borst	Transport	TRAN-S8 Design requirements for loading spaces and vehicle standing spaces Loading spa	Oppose	Considers the standard inappropriate for rural conditions and imposes unnecessary discretion over loading needs. Also considers the standard relies on outdated and inaccessible standards, and should instead include clear, explicit provisions within the plan.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. Loading spaces and vehicle standing spaces required under TRAN-S5 must be designed, constructed and maintained in accordance with [produce a specific standard in the text here].~~AS 2890.2.2002 Parking facilities Part 2: Off-street commercial vehicle facilities, for the specified minimum design vehicle.~~ Matters of discretion are restricted to: 1. the effective, efficient and safe operation of the transport network; and ~~2. the identified loading and vehicle space needs of the activity.~~
292.292	Robert and Sylvia Borst	Transport	TRAN-S9 Accessible parking spaces Where parking spaces are provided on site: any on-si	Support	Support subject to submission(s) from disability advocate organisations, particularly regarding application to rural zones.	Seeks to retain with any amendments requested by disability advocate organisations and disabled people.

292.293	Robert and Sylvia Borst	Transport	TRAN-S10 Design requirements for on-site vehicle parking spaces Where parking spaces ar	Oppose	Considers the standard imposes design requirements that are unclear or unsuitable for rural and residential contexts and regulates internal site effects inconsistent with TRAN-O1.	Seeks to amend as follows: Where parking spaces are provided on a site: 1. car parking must comply with the requirements of [provide standard here] ~~AS 2890.1:2004 Parking facilities Part 1: Off-street car parking~~, except for: a. a parking space in a garage or carport; or b. staff parking that is provided as stacked parking of no more than two vehicles, or c. parking for residential or primary production activity. ...
292.294	Robert and Sylvia Borst	Transport	TRAN-S11 Surface of parking and loading areas The surface of all parking and loading a	Oppose	Considers the standard imposes unnecessarily low thresholds and surface requirements on parking and loading areas in rural and residential zones, regulates internal site effects inconsistent with TRAN-O1, and conflicts with permitted pathways for multiple residential units.	Seeks to delete or include as advice note. Alternatively, seeks to amend as follows: 1. The surface of ~~all~~ parking and loading areas must either be: ... 2. Clause 1 does not apply where a site contains parking for ~~one~~residential units or primary production activity.
292.295	Robert and Sylvia Borst	Transport	TRAN-S12 On-site cycle parking All developments, excluding residential units and prima	Oppose	Considers the standard inappropriately applies cycle parking requirements in rural areas where cycling is impractical and potentially unsafe and is overly prescriptive in its design standards.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. All developments, excluding residential units and primary production, ~~must~~ should provide cycle parking at a rate of 1 cycle parking for every 10 car parking spaces provided; and 2. cycle parking ~~must~~ should meet the following minimum specifications: a. cycle parking facilities ~~must~~ should be: i. signposted or visible to cyclists entering the site; and ~~ii. located as close as possible to, and no more than 15m from at least one main pedestrian public entrance to the building/activity; and~~ iii. located so they do not impede pedestrian thoroughfares, including areas used by people whose mobility or vision is restricted; and iv. clear of vehicle parking or manoeuvring areas; ~~b. cycle parking facilities must be available during the activity's hours of operation and must not be impeded by any structure, storage of goods, landscape planting or other use; and~~ ~~c. long stay cycle parking facilities (for staff or residents) must be located:~~ ~~i. in a covered area; and~~ ~~ii. in an area where access by the general public is generally excluded.~~

						~~Note: Refer to the Austroads Bicycle Parking Facilities: Guidelines for design and installation: October 2-16 (AP-R527-16).~~ Matters of discretion are restricted to: ... 4. whether cycling is a safe method of transport to the site.
292.296	Robert and Sylvia Borst	Transport	TRAN-S13 Width and number of vehicle crossings onto roads Every lot with direct vehicl	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
292.297	Robert and Sylvia Borst	Transport	TRAN-S14 Formation and sealing of vehicle crossings All vehicle crossings onto a seale	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
292.298	Robert and Sylvia Borst	Transport	TRAN-S15 Distance between vehicle crossings and road intersections the distance betwee	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
292.299	Robert and Sylvia Borst	Transport	TRAN-S16 Sight distances from vehicle crossings Any vehicle crossing onto a road other	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
292.300	Robert and Sylvia Borst	Transport	Table 6 – High trip generator thresholds	Support	Supports the thresholds with modification to raise the lower limits, as considers there is no technical evidence supporting the current thresholds and managing effects through vehicle movements is more appropriate. Also considers that valuable services such as emergency, healthcare, education, recreation, and community facilities should be given higher permitted thresholds to reduce consent barriers and better reflect their social importance.	Seeks to incorporate management of the effects from publicly owned or funded educational facilities managed by TRAN-R8 when a road need upgraded to meet effects from an exceeded threshold. [refer to original submission for full relief sought]
292.301	Robert and Sylvia Borst	Transport	Table 7 – Minimum legal widths and formation requirements for private ways/access lots	Oppose	Considers the table unnecessarily duplicates TRAN-S2 by applying minimum legal widths and formation requirements to private ways, manages only internal site effects, and relies on inaccessible standards without supporting technical evidence.	Seeks to amend as follows: Table 7 – Minimum legal widths and formation requirements for ~~private ways/~~access lots
292.302	Robert and Sylvia Borst	Energy	General	Amend	Considers that the chapter does not adequately reflect the benefits and low environmental impact of renewable energy and places excessive consent burdens on activities that should be encouraged, especially those generating electricity at the point of consumption to reduce demand on large-scale infrastructure.	Seeks for the chapter to reflect the benefits and low environmental impact of renewable energy and to reduce consent burdens on these activities [inferred relief requested].
292.303	Robert and Sylvia Borst	Energy	ENG-O1 Recognising the benefits of renewable electricity generation The significant local,	Support	No specific reasons given	Retain as notified
292.304	Robert and Sylvia Borst	Energy	ENG-O2 Design and location of renewable electricity	Support	No specific reasons given	Retain as notified

			generation Renewable electricity ge			
292.305	Robert and Sylvia Borst	Energy	ENG-O3 Protecting the values and qualities of any overlay Waitaki District's overlays a	Oppose	Considers that not all overlays are equal and not all renewable energy methods are equal.	Seeks to amend as follows: ENG-O3 Protecting the values and qualities of ~~any~~overlay Waitaki District's overlays are protected as far as practicable from ~~the~~any significant adverse effects of renewable electricity generation activities.
292.306	Robert and Sylvia Borst	Energy	ENG-P1 Recognising the benefits of renewable electricity generation Recognise the local, r	Support	No specific reasons given	Retain as notified
292.307	Robert and Sylvia Borst	Energy	ENG-P2 Existing activities Enable the ongoing refurbishment, maintenance and repair, an	Support	No specific reasons given	Retain as notified
292.308	Robert and Sylvia Borst	Energy	ENG-P3 Effects on renewable electricity generation activities Only allow new sensitive act	Support	No specific reasons given	Retain as notified
292.309	Robert and Sylvia Borst	Energy	ENG-P4 Small scale renewable electricity generation activities and investigation activities ou	Support	Supports with amendments to also enable small scale renewable electricity generation activities within overlays, particularly extensive overlays such as ONL and RSL where entire properties are affected. Considers energy-related overlays (e.g., National Grid yard, Waitaki Power Scheme) should not restrict renewable energy generation and that natural hazard overlays aregenerally irrelevantto renewable energy effects beyond structural limitations. Considers small-scale renewable energy generation should be enabled across all overlays, with large-scale activities controlled only withinidentifiedoverlays. Also considers that the PDP should "recognise and provide for" small-scale renewable electricity generation to align with the NPS-REG.	Seeks to amend as follows: ENG-P4 Small scale renewable electricity generation activities and investigation activities ~~outside of overlays~~ ~~Enable~~ Recognise and provide for small scale renewable electricity generation activities and activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation activities, ~~where:~~ ~~1. it is of a form, location and scale that minimises adverse effects on the environment; and~~ ~~2. it is consistent with the anticipated amenity values and character of the zone; and~~ ~~3. where it is demonstrated that all adverse effects on an overlay cannot be avoided, it appropriately offsets or compensates the adverse effects.~~
292.310	Robert and Sylvia Borst	Energy	ENG-P5 Small scale renewable electricity generation activities and investigation activities in	Oppose	Considers that small-scale renewable energy generation should be provided for under the NPS-REG as its effects are minor and existing overlay chapters already manage structural impacts. Considers that discouraging such activities may lead to greater reliance on large-scale projects with more significant effects.	Seeks to delete the policy. Alternatively, seeks to amend as follows: ~~Only allow~~Recognise and provide for small scale renewable electricity generation activities and activities associated with the investigation, identification and assessment of potential sites and

						energy sources for renewable electricity generation activities within an overlay where: 1. if located on buildings, items and sites identified in SCHED2 – Historic Heritage Items, SCHED3 – Character Contributing Buildings and non-contributing buildings where the building is a character contributing building, and SCHED5 – Sites and Areas of Significance to Māori: a. its location is sympathetic to the identified values where practicable; and b. ~~any structure is not visible from any adjoining public place and~~where practicable, is aligned with the plane of the roof where located on a roof; 2. if located within the root protection area of a tree identified in SCHED4 - Notable Trees, the work will not likely compromise the long-term health, natural life or values of the Notable Tree; ... ~~5. it is demonstrated that all adverse effects on the values of the relevant overlay cannot be avoided, it appropriately offsets or compensates the adverse effects.~~
292.311	Robert and Sylvia Borst	Energy	ENG-P6 Large scale renewable electricity generation activities Provide for large scale	Support	Considers that large scale activities have more significant effects and it is appropriate to manage them.	Retain as notified
292.312	Robert and Sylvia Borst	Energy	ENG-P7 Large scale renewable electricity generation activities in other zones and within overl	Support	Considers that large scale activities have more significant effects and it is appropriate to manage them.	Retain as notified
292.313	Robert and Sylvia Borst	Energy	ENG-P8 New technology Recognise the opportunity for new technology in renewable electri	Support	No specific reasons given	Retain as notified
292.314	Robert and Sylvia Borst	Energy	ENG-P9 Decommissioning of renewable electricity generation activities Require that, during	Support	No specific reasons given	Retain as notified
292.315	Robert and Sylvia Borst	Energy	ENG-R1 The operation, maintenance, and refurbishment of existing renewable electricity generat	Support	No specific reasons given	Retain as notified
292.316	Robert and Sylvia Borst	Energy	ENG-R2 The operation, maintenance, and refurbishment of existing renewable electricity generat	Support	No specific reasons given	Retain as notified
292.317	Robert and Sylvia Borst	Energy	ENG-R3 Small scale renewable electricity generation activities outside of an overlay Al	Support	Support but considers it should also apply within overlays subject to the provisions of the relevant chapter in that overlay.	Seeks to amend as follows: ENG-R3 Small scale renewable electricity generation activities ~~outside of an overlay~~

292.318	Robert and Sylvia Borst	Energy	ENG-R4 Investigation activities outside of an overlay All zones Activity status: Perm	Support	No specific reasons given	Retain as notified
292.319	Robert and Sylvia Borst	Energy	ENG-R5 Small scale renewable electricity generation activities and investigation activities in	Oppose	Considers small-scale renewable generation should be permitted activities as they are low impact and a restricted discretionary status adds disproportionate costs that discourage such activities and conflict with the NPS-REG.	Seeks to delete the rule and manage with ENG-R3. Alternatively, seeks to amend to a controlled activity [refer to original submission for full relief sought]
292.320	Robert and Sylvia Borst	Energy	ENG-R6 Small scale renewable electricity generation activities and investigation activities wi	Support	No specific reasons given	Retain as notified
292.321	Robert and Sylvia Borst	Energy	ENG-R7 Large scale renewable electricity generation activities General Rural Zone Act	Oppose	Considers that renewable energy as a non-complying activity across overlays contradicts the NPS-REG, especially where overlays are intended for energy generation, and given that adverse effects are already managed by other chapters, the activity should be (restricted) discretionary.	Seeks to amend as follows: Activity status: Restricted Discretionary [refer to original submission for full relief sought]
292.322	Robert and Sylvia Borst	Energy	ENG-R8 Other renewable electricity generation activities not otherwise provided for All	Oppose	Considers the rule is unclear in scope and appears to pre-emptively control assumed future effects without justification and this will discourage innovation and renewable energy generation contrary to the NPS-REG. Considers any necessary controls should be addressed in relevant chapters only when actual effects are known.	Seeks to delete ENG-R8 and manage the effects within the relevant zone or overlay chapter.
292.323	Robert and Sylvia Borst	Energy	ENG-S1 Small scale solar panels All zones The panel must not exceed the permitted bu	Support	No specific reasons given	Retain as notified
292.324	Robert and Sylvia Borst	Energy	ENG-S2 Small scale roof mounted wind turbines All zones The turbine (including the f	Support	No specific reasons given	Retain as notified
292.325	Robert and Sylvia Borst	Energy	ENG-S3 Small scale freestanding wind turbines General Rural Zone Special Purpose Zo	Support	No specific reasons given	Retain as notified
292.326	Robert and Sylvia Borst	Energy	ENG-S4 Small scale hydro generators General Rural Zone Rural Lifestyle Zone Industr	Support	Supports with amendments as the 200m^2 limit is too restrictive for stored water and the dam height is better regulated under the Dam Safety Regulations 2022. Considers the matters of discretion vague, such as 'suitability of the site' and lack clarity and justification, especially when many dams relate to existing water bodies or irrigation systems.	Seeks to amend as follows: 1. The maximum surface area of any stored water solely for hydroelectricity does not exceed 200m2; and 2. the maximum height of a weir or dam solely for hydroelectricity does not exceed 2m; and 3. the maximum installed capacity does not exceed 4 megawatts (MW).

						Matters of discretion are restricted to: ... ~~3. the suitability of the site for the proposed activity; and~~ ...
292.327	Robert and Sylvia Borst	Earthworks	EW(Q)-S2 Setback from a site boundary General Rural Zone Special Purpose Zone – Macra	Support	Supports the setback standard for farm quarries but considers the required distance from neighbouring properties should be reduced as considers it is excessive and limits quarry location options. Further notes that the remaining land is less suitable due to high groundwater and being in the middle of paddocks.	Seeks to amend setback to 20m consistent with the set back from waterways. Seeks to amend as follows: 1.New Farm quarries and new restricted use quarries must not be located within ~~100m~~ 20m of a residential activity on an adjoining site under different ownership from that of the land on which the farm quarry or restricted use quarry islocated. 2. On sites adjoining a Residential or Settlement Zone boundary, the setback shall be at least 300m from the boundary for any new quarry, including restricted use quarry and farm quarry.
292.328	Robert and Sylvia Borst	NOIC – North Otago Irrigation Company Limited	North Otago Irrigation Scheme Designation Unique Identifier NOIC-1 Designation P	Support	No specific reasons given	Retain as notified
293.1	Brock and Gemma Hamilton	Strategic Direction	General	Support	In general support of Strategic Direction chapter, in particular the historical and cultural identity and values, and the rural areas. [Refer to original submission for full reasons]	Retain as notified
293.2	Brock and Gemma Hamilton	Definitions	Agricultural intensification in relation to the Ecosystems and Indigenous Biodiversity c	Oppose	[Refer to original submission for full reasons]	[Refer to original submission for full relief sought] Seeks to add a new definition as follows: ~~Agricultural intensification:~~High rate irrigation: in relation to the ~~Ecosystems and Indigenous Biodiversity chapter, Natural Features and Landscapes chapter, and the~~ Sites and Areas of Significance to Māori chapter where rock art is identified, means change from non-irrigated primary production (including plantation forestry) to ~~irrigated~~ agricultural production that is irrigated to a depth more than 10mm, or not controlled by a Freshwater Farm Plan on land that is not currently irrigated as of 1st March 2025. ~~It also includes any change from irrigated crop and seed production to dairy farming.~~
293.3	Brock and Gemma Hamilton	Definitions	Commercial activity NPS means any activity trading in goods, equipment or services. It	Oppose	Considers the definition captures not-for-profit and charity trading unlikely to be of a scale to cause significant adverse effects.	Seeks to amend as follows: Commercial activities: means any activity trading in goods, equipment or services for profit....
293.4	Brock and Gemma Hamilton	Definitions	Farm building means a building used for the exercise of farming activities and excludes:	Oppose	Considers the term 'primary production activities' should be used consistently in the PDP.	Seeks to amend as follows:

						means a building used for the exercise of ~~farming~~ primary production activities and excludes:
293.5	Brock and Gemma Hamilton	Definitions	Farm track An un-sealed private track serving permitted agricultural or forestry activit	Oppose	Considers that the definition of farm track should also include those serving consented activities and that sealed farm tracks offer environmental benefits such as reducing sediment loss and controlling dust. Considers that the term 'primary production activity should be used as there is no definition for 'agricultural' activity.	Seeks to amend as follows: An un-sealed or sealed private track serving ~~permitted agricultural or forestry~~primary production activities.
293.6	Brock and Gemma Hamilton	Definitions	Hazardous facility means a facility or activity that involves the use, storage or dispos	Oppose	No specific reason given.	Seeks to retain as notified
293.7	Brock and Gemma Hamilton	Definitions	Heritage professional means a person with a degree or recognised post-graduate qualifica	Amend	Considers the phrase 'recognised postgraduate qualification 'too vague, as it doesn't specify who recognises it or how.	Seeks to amend as follows: means a person with a degree or~~recognised~~ post-graduate qualification in a field related to heritage conservation or management ..
293.8	Brock and Gemma Hamilton	Definitions	Identified taoka has the same meaning as in the National Policy Statement on Indigenous	Oppose	Considers that there should be a schedule or list of acknowledged or identified taoka as the PDP's use of the term 'taoka' is ambiguous, making it unclear whether references are to be identified or acknowledged taoka.	Seeks to add a schedule of identified taoka and acknowledged taoka into the PDP. Remove provisions for taoka until a list is provided and provisions can be submitted on.
293.9	Brock and Gemma Hamilton	Definitions	Intensive outdoor primary production means primary production activities involving the	Oppose	Considers that the definition is vague and open to subjective interpretation and that the terms 'regular' and 'substantially provided other than from the site concerned' should be defined.	Seeks to amend as follows: Intensive outdoor primary production means primary production activities involving the keeping or rearing of livestock, or commercial aquaculture, where the ~~regular~~majority feed source for the production of goods is ~~substantially~~ provided other than from the site concerned... It excludes the following: ... e. Primary production activities when a drought is declared
293.10	Brock and Gemma Hamilton	Definitions	Pervious surface means any part of a site which is grassed or planted in trees or shrubs	Oppose	Considers that other surfaces maybe pervious such as stones or other types of garden.	Seeks to amend as follows: Pervious surface means any part of a site which ~~is grassed or planted in trees or shrubs and~~ is capable of absorbing water including soft landscaping, grass and planted trees or shrubs. It does not include impervious surfaces or any area which:
293.11	Brock and Gemma Hamilton	Definitions	Potentially high-impact industrial activities means industrial activities that because o	Oppose	Considers the definition to be broad, unintentionally including hunting, home kill, and septic tanks, which are low-impact and may duplicate regional consent requirements. Additional consent burdens may discourage the development of quality housing and affordable food production.	Seeks to amend as follows: ...

						2.commercial and non-pest species meat processing, or ~~any~~ associated processing of meat and meat by-products, or co-products; ... 10. storage and disposal of sewage, septic tank sludge, or refuse other than at the source;
293.12	Brock and Gemma Hamilton	Definitions	Recreational activity means the use of land and/or buildings for the purpose of active o	Oppose	Considers that the definition is circular as it uses 'recreation' within the definition itself.	Seeks to amend as follows: Recreational activity: means the use of land and/or buildings for the purpose of active or passive enjoyment of organised sports, ~~recreation~~or entertainment. Excludes any recreational activity within the meaning of residential activity.
293.13	Brock and Gemma Hamilton	Definitions	Regionally significant infrastructure is: strategic land transport network and arterial	Support	No specific reasons given	Retain as notified
293.14	Brock and Gemma Hamilton	Definitions	Repair workshop means the mechanical repair and servicing of motor vehicles (includes mo	Oppose	Considers that if the definition was applied outside of the Local Centre Zone, it could include farm and residential workshops.	Retain as notified - but only in the LCZ. If used in other zones, seeks to amend as follows: Repair workshop means the commercial mechanical repair and servicing of motor vehicles (includes motorcycles, caravans, boat motors, trailers) inside a building.
293.15	Brock and Gemma Hamilton	Definitions	Sensitive environment area of land contained within any of the following areas: Coa	Oppose	Considers that the district plan has no jurisdiction on airspace and that the correct term for the height of land above sea level is 'elevation'.	Seeks to delete clause (11) or amend as follows: 11. Above 900 metres in ~~altitude~~ elevation
293.16	Brock and Gemma Hamilton	Definitions	Riparian margin means: for land in the General Rural Zone, all landward property adjo	Oppose	Considers the definition is inconsistent with other measures under the RMA which manage similar sediment issues such as the regulations controlling intensive winter grazing which have a 5m buffer.	Seeks to amend as follows: 1. ~~for land in the General Rural Zone~~, all landward property adjoining and within ~~20~~5 metres of the boundary of the bed of a river or lake, or of the edge of a wetland; ~~and~~ ~~2. for land outside the General Rural Zone, all landward property adjoining and within 10 metres of the boundary of the bed of a river or lake, or of the edge of a wetland.~~
293.17	Brock and Gemma Hamilton	Definitions	Temporary activity means activities and their ancillary buildings and structures that ar	Support	Supports the definition but considers that the undefined term 'helicopter' could be interpreted too broadly and include anything from a drone, gyrocopter through to high impact military helicopters which require support services. Considers that the term 'aircraft' is appropriate to use as it encompasses helicopters, drones, gyrocopters, and fixed-wing aircraft.	Seeks to amend clause (6) as follows: 6. temporary ~~helicopter~~aircraft take-offs and landings; and

293.18	Brock and Gemma Hamilton	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Considers that the term 'chemical' [clause (6)] is too broad and could include harmless substances like water or atmospheric gases and that requiring proof of a change to the hydrological balance is impractical, as baseline data is not generally available. Considers that many of the listed effects may occur accidentally or naturally, and the wording should allow for such occurrences. Considers it ambiguous whether cushionfield[clause (8)] is the competitor or the outcompeted species referred to. Also considers the reference to mob-stocking [clause (10)] is unclear and potentially contradictory, as grazing is excluded from the definition and is often beneficial to ecosystems - suggests using the term 'pugging' as an alternative. Considers that the term 'established farming practice' lacks a clear method or explanation for how it is determined. Considers that restrictions on indigenous vegetation removal may disincentivise new plantings and will be more expensive to establish than exotic species (which also offer better returns under the Emissions Trading Scheme) and would also limit access to non-threatened indigenous species like manuka, which are valuable for low-cost home heating.	Seeks to amend as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation established as of 1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate: 1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of ~~chemicals~~ harmful substances including herbicide;7. burning;8.~~the deliberate~~ application of water, fertiliser or oversowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion, ~~including dryland cushionfield species;~~9.~~the~~ drainage of mapped wetlands or lakes;~~10. mob-stocking; and~~11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site~~; b. walking; c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood
293.19	Brock and Gemma Hamilton	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried (not mined). Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	Seeks to amend as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones~~, and a prescribed substance within the meaning of the Atomic Energy Act 1945
293.20	Brock and Gemma Hamilton	Mana whenua	General	Support	Support in part [Refer to original submission for full reasons]	Retain as notified
293.21	Brock and Gemma Hamilton	Mana whenua	Consultation with mana whenua	Support	Supports in part. Support is expressed for clearly identifying when mana whenua may be affected by a proposal. Considers that where iwi consultation is encouraged, costs should be recoverable and that for matters of national importance (including mana whenua, historic heritage, natural features, ecosystems, and natural hazard), costs should be publicly funded, not charged to individual applicants. Considers that specifying applicant fees is outside the scope of the PDP and that consultation processes	Seeks to remove reference to applicants being charged fees for consultation and for a memorandum of understanding to be consulted on prior to further submissions.

					should be guided by memorandums of understanding or similar, as recommended in the SASM Section 32 report.	
293.22	Brock and Gemma Hamilton	Natural Hazards	NH-O1 Natural hazard risk The risks from natural hazards, including the effects of climate	Support	Supports with modifications to include proportionality of the avoidance and mitigation to the level of risk.	Seeks to amend as follows: The impact on people, property and the environment from the risks of natural hazards and the effects of climate change are recognised, avoided or mitigated relative to the level of risk.
293.23	Brock and Gemma Hamilton	Natural Hazards	NH-P1 Identification of natural hazard areas As information becomes available, identify an	Support	Support in part with modification to better focus the policy.	Seeks to amend as follows: As information becomes available, identify and map land that ~~may~~ is known to be subject to natural hazards, including taking into account the effects of climate change.
293.24	Brock and Gemma Hamilton	Natural Hazards	NH-P2 Risk based approach Avoid subdivision, use and development in areas where natural	Support	No specific reasons given	Retain as notified
293.25	Brock and Gemma Hamilton	Natural Hazards	NH-P3 Critical facilities and regionally significant infrastructure Avoid locating critica	Support	No specific reasons given	Retain as notified
293.26	Brock and Gemma Hamilton	Natural Hazards	NH-P4 Natural protection features Encourage the use, protection, maintenance and enhanc	Support	Support with recommendation to expand scope to explicitly require engineering solutions where natural protection features are unsuitable, particularly in cases involving the protection of infrastructure, people, and property, where more reliable methods may be necessary.	Seeks to amend as follows: Encourage the use, protection, maintenance and enhancement of natural features, buffers and systems, such as wetlands and vegetation, which provide protection from natural hazard risk where engineering solutions are not required to mitigate risk to people, property and infrastructure.
293.27	Brock and Gemma Hamilton	Natural Hazards	NH-P13 Other natural hazard awareness overlays Encourage proposals for subdivision, use an	Support	Supports in part but considers an assessment should not be required in all cases, especially when there's no evidence that a specific use is at risk from an awareness overlay. Considers there is no clear definition of what constitutes an 'acceptable level' of risk and who determines it.	Seeks to amend as follows: Encourage proposals for subdivision, ~~use~~and development in a natural hazard awareness overlay to undertake an assessment of natural hazard risk and incorporate any methods to reduce or mitigate the risk.~~to an acceptable level.~~ Alternatively, if 'use' is to remain, seeks to amend as follows: Encourage proposals for subdivision, use and development in a natural hazard awareness overlay to ~~undertake an assessment~~consider the effects of natural hazard risk and incorporate methods to reduce or mitigate the risk ~~to an acceptable level.~~
293.28	Brock and Gemma Hamilton	Natural Hazards	NH-R1 Buildings, structures and fences in the Otago Flood Assessment Overlay All zones	Oppose	Considers the definition should acknowledge that other farm structures, like poles or irrigation infrastructure, are not more flood-prone or hazardous than those already listed, and may even	Seeks to amend as follows:

					mitigate risk. Considers the term 'suitably qualified and experienced professional' should be clarified.	PER-1 The building or structure is: ... 3. an unenclosed building without a floor or with a concrete floor; or ... 6. a pole; or 7. irrigation or stockwater infrastructure Seeks clarification on the term 'suitably qualified and experienced professional'
293.29	Brock and Gemma Hamilton	Natural Hazards	NH-R2 Buildings, structures and fences in the Canterbury Flood Assessment Overlay All z	Oppose	Considers the definition should acknowledge that other farm structures, like poles or irrigation infrastructure, are not more flood-prone or hazardous than those already listed and may even mitigate risk.	Seeks toadd provision for other floors in buildings and structures like poles and water infrastructure
293.30	Brock and Gemma Hamilton	Natural Hazards	NH-R4 Earthworks excluding land disturbance in all Flood Assessment Overlays All zones	Support	Supports with recommendation to permit the building of tracks.	Seeks to amend as follows: PER-3 The earthworks are for the construction of a farm track.
293.31	Brock and Gemma Hamilton	Natural Hazards	NH-R6 Land use activities in the Canterbury Flood Assessment Overlay, the Otago Flood Assessme	Support	Supports with recommendation to add other uses which are compatible with the objectives and policies of the Natural Hazards chapter such as airstrips and helicopter take-off and landing areas.	Seeks to amend as follows: 5. Aeroplane airstrips and helicopter take off and landing areas.
293.32	Brock and Gemma Hamilton	Natural Hazards	NH-P5 Site specific assessment/investigation A risk assessment will be required for subdiv	Support	No specific reasons given	Retain as notified
293.33	Brock and Gemma Hamilton	Natural Hazards	NH-P6 Canterbury Flood Assessment Overlay Except as provided for in NH-P3, avoid subdiv	Support	No specific reasons given	Retain as notified
293.34	Brock and Gemma Hamilton	Natural Hazards	NH-P7 Otago Flood Assessment Overlay and Waitaki River Floodplain Assessment Overlay Ex	Support	No specific reasons given	Retain as notified
293.35	Brock and Gemma Hamilton	Natural Hazards	NH-P11 Liquefaction Assessment Overlay Provide for subdivision in the Liquefaction Assessm	Support	No specific reasons given	Retain as notified
293.36	Brock and Gemma Hamilton	Natural Hazards	NH-P12 Wildfire – subdivision and land use Ensure that subdivision and land use in area	Support	No specific reasons given	Retain as notified

293.37	Brock and Gemma Hamilton	Natural Hazards	NH-R3 Buildings, structures and fences in the Waitaki River Floodplain Assessment Overlay	Oppose	Considers the definition should acknowledge that other farm structures, like poles or irrigation infrastructure, are not more flood-prone or hazardous than those already listed and may even mitigate risk.	Seeks to add provision for other floors in buildings and structures like poles and water infrastructure.
293.38	Brock and Gemma Hamilton	Natural Hazards	NH-R13 Wildfire – woodlots, shelterbelts, plantation forestry and buildings All zones	Amend	Supports with modification to encourage the planting of low flammability plants, particularly near houses.	Seeks to amend as follows: PER-4 The wood lot, shelterbelt or plantation forestry is a species listed in the FENZ Low Flammability Plant Directory.
293.39	Brock and Gemma Hamilton	Hazardous Substances	General	Support	Support for chapter and definitions	Retain as notified
293.40	Brock and Gemma Hamilton	Historic Heritage	HH-O1 Protection of historic heritage The District's historic heritage is recognised, main	Support	No specific reasons given	Retain as notified
293.41	Brock and Gemma Hamilton	Historic Heritage	HH-O2 Use and adaptive re-use of historic heritage Historic Heritage Items and their herit	Support	Supports noting that primary production is sympathetic re-use of the heritage settings where existing.	Retain as notified
293.42	Brock and Gemma Hamilton	Historic Heritage	HH-P1 Recognise historic heritage Identify Historic Heritage Items and their associated	Support	Support with recommendation to recognise landowners' interests and consent in heritage protection. Considers heritage protection to be more effective when landowners are constructively engaged and permission is required for listing.	Seeks to amend as follows: With landowner permission, identify Historic Heritage Items and their associated heritage settings throughout the Waitaki district that warrant protection in SCHED2 – Historic Heritage Items, and are significant in terms of one or more of the following values: ...
293.43	Brock and Gemma Hamilton	Historic Heritage	HH-P2 Historic heritage scheduling Classify Historic Heritage Items and their associate	Support	No specific reasons given	Retain as notified
293.44	Brock and Gemma Hamilton	Historic Heritage	HH-P3 Benefits of active use, adaptive re-use, and protection of historic heritage Recogni	Support	Support in the context of re-use being primary production.	Retain as notified
293.45	Brock and Gemma Hamilton	Historic Heritage	HH-P4 Heritage maintenance Enable the use and heritage maintenance of the Historic Heri	Support	Support in the context of re-use being primary production.	Retain as notified
293.46	Brock and Gemma Hamilton	Historic Heritage	HH-P5 Modern service attachments Enable attachments to Historic Heritage Items included	Support	No specific reasons given	Retain as notified

293.47	Brock and Gemma Hamilton	Historic Heritage	HH-P6 Heritage restoration Control the heritage restoration of Historic Heritage Items	Support	No specific reasons given	Retain as notified
293.48	Brock and Gemma Hamilton	Historic Heritage	HH-P7 Retaining historic heritage – earthquake and flooding resiliency Encourage earthquak	Support	No specific reasons given	Retain as notified
293.49	Brock and Gemma Hamilton	Historic Heritage	HH-P8 Protecting historic heritage from inappropriate heritage alterations Provide for	Support	No specific reasons given	Retain as notified
293.50	Brock and Gemma Hamilton	Historic Heritage	HH-P9 Relocation of Historic Heritage Items within or beyond their heritage setting Allow	Support	No specific reasons given	Retain as notified
293.51	Brock and Gemma Hamilton	Historic Heritage	HH-P10 Demolition or destruction of Category B Historic Heritage Items Only allow the d	Support	No specific reasons given	Retain as notified
293.52	Brock and Gemma Hamilton	Historic Heritage	HH-P11 Demolition or destruction of Category A Historic Heritage Items Avoid the demolitio	Support	No specific reasons given	Retain as notified
293.53	Brock and Gemma Hamilton	Historic Heritage	HH-P12 Buildings and structures within heritage settings Only allow new buildings and s	Support	No specific reasons given	Retain as notified
293.54	Brock and Gemma Hamilton	Historic Heritage	HH-P13 Subdivision of sites containing Historic Heritage Items Only allow subdivision o	Support	No specific reasons given	Retain as notified
293.55	Brock and Gemma Hamilton	Historic Heritage	HH-P14 Planning incentives to encourage the sustainable use of Historic Heritage Items Ass	Support	No specific reasons given	Retain as notified
293.56	Brock and Gemma Hamilton	Historic Heritage	HH-P15 Future consideration of historic heritage Council continues to investigate the iden	Oppose	Considers this to be a council matter, not a planning matter as future councils may have different priorities and should not be bound by past policies or required to undertake a plan change between cycles.	Seeks to delete the policy.
293.57	Brock and Gemma Hamilton	Historic Heritage	HH-R1 Heritage maintenance on Historic Heritage Items listed in SCHED2 – Historic Heritage Ite	Support	No specific reasons given	Retain as notified

293.58	Brock and Gemma Hamilton	Historic Heritage	HH-R2 Animal grazing on sites and their heritage setting identified in SCHED2 – Historic Herit	Support	Supports in the context of a working farm.	Retain as notified
293.59	Brock and Gemma Hamilton	Historic Heritage	HH-R3 Earthworks within the heritage setting of a Historic Heritage Item listed in SCHED2 – Hi	Support	Supports in the context of a working farm.	Retain as notified
293.60	Brock and Gemma Hamilton	Historic Heritage	HH-R5 New buildings, structures and signs, or alterations to an existing building or structure	Support	Support with suggested modifications to reflect the practical needs of heritage items located in a rural context where structures like fences and pipes are necessary for primary production.	Seeks to amend as follows: PER 1 Any new building, structure or sign is: ... 5. is a post and wire or post and rail fence; or 6. is irrigation or stock water infrastructure; or
293.61	Brock and Gemma Hamilton	Historic Heritage	HH-R12 Relocation of a Category B Historic Heritage Item listed in SCHED2 – Historic Heritage	Support	No specific reason given	Retain as notified
293.62	Brock and Gemma Hamilton	Historic Heritage	HH-R13 Relocation of a Category A Historic Heritage Item listed in SCHED2 – Historic Heritage	Oppose	Considers that the relocation of heritage items can sometimes improve their condition or address health and safety risks (for example the Herbert War Memorial) and that making consent too difficult may increase the risk of demolition by neglect.	Seeks toamendHH-R13 to a discretionary activity.
293.63	Brock and Gemma Hamilton	Historic Heritage	HH-R14 Any demolition of a Historic Heritage Item listed in SCHED2 – Historic Heritage Items	Oppose	Considers this to be a council matter, not a planning matter as future councils may have different priorities and should not be bound by past policies or required to undertake a plan change between cycles.	Seeks to delete HH-M1
293.64	Brock and Gemma Hamilton	Historic Heritage	HH-R14 Any demolition of a Historic Heritage Item listed in SCHED2 – Historic Heritage Items	Support	Supports the intent but considers this to be a council matter rather than a planning matter.	Seeks todeleteHH-M4
293.65	Brock and Gemma Hamilton	Notable Trees	General	Support	Support for the chapter	Retain as notified
293.66	Brock and Gemma Hamilton	Notable Trees	TREE-P5 Other trimming and pruning of Notable Trees Provide for any other trimming of N	Support	Support with modifications as not possible to confirm long-term impacts of trimming on tree health or lifespan in advance. Considers 'likelihood' is a more practical measure than certainty. Also considers that trimming may alter a tree's natural form, especially when removing diseased or hazardous limbs and that TREE-S1 should also be considered regarding the retention of natural form.	Seeks to amend as follows: Provide for any other trimming of Notable Trees where it can be demonstrated that the works do not: 1.likely compromise the long-term health of the Notable Tree; 2. compromise the identified values of the Notable Tree, listed in SCHED4 - Notable Trees; 3.likelyreduce the natural life of the Notable Tree;

						4. increase the risk of the Notable Tree being subject to wind damage; and 5. impact the natural shape and form of the Notable Tree more than necessary.
293.67	Brock and Gemma Hamilton	Notable Trees	TREE-S1 Trimming of Notable Trees All zones The maximum branch diameter being trimm	Support	No specific reason given	Retain as notified
293.68	Brock and Gemma Hamilton	Notable Trees	TREE-S2 Trimming or removal of Notable Trees posing a threat to people or property All	Support	No specific reason given	Retain as notified
293.69	Brock and Gemma Hamilton	Notable Trees	TREE-S3 Trimming or removal of Notable Trees All zones The works are undertaken or	Support	No specific reason given	Retain as notified
293.70	Brock and Gemma Hamilton	Notable Trees	TREE-R1 Maintenance of the ground within the root protection area of a Notable Tree All	Support	No specific reason given	Retain as notified
293.71	Brock and Gemma Hamilton	Notable Trees	TREE-R2 Trimming or pruning of a Notable Tree All zones Activity status: Permitted	Support	No specific reason given	Retain as notified
293.72	Brock and Gemma Hamilton	Notable Trees	TREE-R3 Removal of a Notable Tree All zones Activity status: Permitted Where: PER-1	Support	No specific reason given	Retain as notified
293.73	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	General	Oppose	[refer to original submission for full reasons]	[Refer to original submission for relief sought]
293.74	Brock and Gemma Hamilton	SCHED5 – Schedule of Sites and Areas of Significance to Maori	ID ref Name Description and Values SASM015 Ōtewhakauki Ōtewhakau	Oppose	Oppose in part Schedule 5. The property is encumbered with the following SASM overlays: SASM013 [refer to original submission for full reasons]	[Refer to original submission for relief sought]
293.75	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	General	Oppose	Considers that Freshwater Farm Plans are set to become the primary planning tool for farmland and aim to streamline consent processes by managing farming effects within a single plan under the RMA, and these may also incorporate SASM values. Considers that Freshwater Farm Plans retain a level playing field because the landowner is obligated to have it certified to carry out activities, while the iwi are obligated to consult with the landowner to advise on protection of their significant sites. Both obligations require good faith and genuine relationships rather than expensive consent burdens involving the district council.	Seeks to reduce consent burdens on farmers and allow them to plan directly with iwi in good faith through Freshwater Farm Plans.
293.76	Brock and Gemma Hamilton	Mana whenua	General	Oppose	Considers there to be a conflict of interest as the plan states that Aukaha helped draft the provisions and will also charge for	Seeks that farms with a certified Freshwater Farm Plan (FWFP) include a chapter on SASM management, allowing for permitted activity status. Alternatively, consultation could be provided by a

					consultation on them. Considers there needs to be a clear separation between plan-making and implementation.	Suitably Qualified Person (SQP) with relevant qualifications and experience, promoting a competitive market and reducing workload for iwi.
293.77	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	General	Oppose	Considers the uncertainty of time and cost associated with consenting, particularly under the SASM provisions should be supported by a service level agreement. Considers that some issues are better addressed through RMA reform and that many Significant Natural Areas and Natural Features and Landscapes appear to have been mapped without proper landowner engagement.	Seeks for the withdrawal of the Sites and Areas of Significance to Māori, Natural Features and Landscapes, Natural Character and Ecosystems and Biodiversity Chaptersuntil the RMA reform is complete and an MOU is in place with Aukaha detailing time and cost of consultation.
293.78	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-O1 Rakatirataka and kaitiakitaka The rakatirataka of mana whenua over their signif	Amend	Supports the intent with modification to clarify that the objective is not intended to be in isolation from the landowner. Considers that that the exercise of kaitiakitaka can't be implemented without agreement from the land owners who have their own rights and responsibilities within their own relationship with the land.	Seeks to amend as follows: The rakatirataka of mana whenua over their significant sites and areas is recognised and they are able to exercise kaitiakitaka within these areas with agreement from the landowners.
293.79	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-O2 Protection of wāhi tūpuna values The relationship of mana whenua with wāhi tūpuna	Support	Support for the objective particularly the goal of increasing community awareness of wāhitūpuna values. Considers that landowners have historically maintained relationships with these sites without needing district plan provisions and that regulation is not necessary to sustain mana whenua connections.	Seeks that the values for protection need to be identified in the PDP.
293.80	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-O3 Preservation of tuhituhi neherā The integrity of tuhituhi neherā sites is prese	Support	No specific reasons given	Retain as notified
293.81	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-O4 Enhancement of mahika kai Mahika kai values are enhanced to support customary use.	Support	Support with modification to recognise that mahikakai values are maintained and where appropriate these values enhanced, as it may not always be possible to enhance.	Seeks to amend as follows: Mahika kai values are maintained or, enhanced where appropriate to support customary use.
293.82	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-O5 Access and use for customary purposes Mana whenua are able to access wāhi tūpuna f	Oppose	Considers the objective requires clarification that it does not imply a general right of access to wāhitūpuna and that access should be with landowner permission. Considers the Trespass Act is impractical for managing access and may strain iwi–landowner relationships.	Seeks to amend as follows: Manawhenua are able to access, where appropriate, wāhitūpuna for customary purposes and are able to use Mahika kai resources in accordance with tikaka and with landowner agreement.
293.83	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-P1 Identification of wāhi tūpuna Working with mana whenua, identify, on Planning m	Support	No specific reason given	Retain as notified
293.84	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-P2 Mana whenua involvement in resource management processes Provide for the invol	Oppose	Considers the policy should clarify whether rules apply only where wāhi tūpuna values remain, or even where they've been physically altered but still hold cultural significance. Considers that consultation for all activities within or near wāhi tūpuna areas places a significant burden on landowners and mana whenua and the policy should be more targeted, directing consultation and notification to situations where it would meaningfully support the protection or enhancement of wāhi tūpuna values.	Seeks to amend the SASM overlay to map only where the values are known to still exist. If the maps cannot be changed, seeks to amend as follows: Provide for the involvement of mana whenua in resource management processes affecting identified wāhitūpuna by encouraging consultation and engagement with mana whenua prior to undertaking activities which will have an adverse effect on

						the maintenance or enhancement of~~or applying for resource consent within or adjoining~~identified wāhitūpuna.
293.85	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-P3 Management of wāhi tūpuna Only allow or provide for land use and development in id	Support	Support with amendment to provide for the protection of existing uses.	Seeks to amend as follows: ~~Only allow or provide for~~ Ensure new land use and development in identified wāhitūpuna ~~where it~~ avoids significant adverse effects, and avoids, remedies or mitigates other adverse effects, on the remaining values associated with these areas, having particular regard to: ...
293.86	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-P4 Obstruction of mauka, tuhituhi neherā and wai māori by structures Avoid the loc	Support	Support is given in part to SASM-P4, with a preference for clearly identifying the locations of mauka,tuhituhi neherā, and wai māori on District Plan maps to guide where structures should be avoided. Considers provision should also be made for compatible structures that support land uses enhancing wāhi tūpuna values, and the policy should explicitly protect existing uses while avoiding vague terms like “or near.”	Seeks to amend as follows: Avoid the location of newstructures in riparian margins, on ~~or near~~limestone outcrops, on upper slopes and on ~~or near~~ ridgelines unless: 1. they do not obstruct views to and across culturally significant waterbodies,tuhituhi neherā or mauka; and ~~2.they avoid adverse effects on the~~the structure can maintain or enhance the wāhi tūpuna values of these areas.
293.87	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-P5 Protection of integrity of tuhituhi neherā Avoid the following activities on, o	Oppose	Concerns with the assumptions in irrigation modelling used to assess impactsandconsiders evidence suggests water loss may be overestimated andlow-rateirrigation can avoid adverse effects. Considers that while the intent to protecttuhituhineherāis supported, the policy should acknowledge that some existing agricultural and forestry activities have been compatible with these values and may continue to be so.	Seeks to permit and encourage low-rate irrigation and discourage high-rate irrigation [refer to original submission]. Also seeks for the protection of existing uses to be explicitly provided for in SASM-P4. Seeks to amend as follows: Avoid the following new activities on areas mapped as, ~~or inclose proximity to~~, limestone outcrops; 1.~~agricultural intensification~~ high-rate irrigation; and 2. plantation forestry, unless any adverse effects on the integrity of tuhituhi neherā from disturbance of land and vegetation and changes in the water table, soil water environment and air moisture are avoided.
293.88	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-P6 Culturally incompatible activities Avoid degradation of the values of wāhi tūpu	Support	No specific reason given.	Seeks to retain as notified.
293.89	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-P7 Habitat restoration and enhancement Encourage restoration and enhancement of indig	Support	No specific reason given.	Seeks to retain as notified.
293.90	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-P8 Mahika kai activities Enable mana whenua to	Support	Support in part with a request for modification, as the PDP does not grant general access rights or transfer ownership of mahikakai resources, and the current user notes lack legal standing and	Seeks that the PDP should clarify that landowner permission is required to undertake mahikakai.

			undertake mahika kai activities in ide		clarity on ownership. Considers the policy should be reworded to more accurately reflect how the objective will be achieved while fostering respectful relationships between landowners and iwi.	Also seeks to amend as follows: Enable mana whenua to undertake mahikakai activities in identified wāhi tūpuna, in accordance with tikaka and with landowner agreement.
293.91	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-P9 Access for customary purposes Maintain existing access opportunities and encourage	Support	Support in part with a request to clarify that it does not create a general right of access to wāhi tūpuna on private land and that access should remain subject to landowner permission. Considers the policy should be reworded to reflect existing legal frameworks and practical considerations, ensuring respectful relationships and sustainable resource management.	Seeks to amend as follows: Maintain existing access opportunities and encourage enhancement of access, where appropriate, for mana whenua to identified wāhi tūpuna for customary purposes with landowner agreement.
293.92	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-P10 Wilding conifer species Protect wāhi tūpuna from modification by wilding conifer	Support	No specific reason given.	Seeks to retain as notified.
293.93	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-R1 Mahika kai activities within a wāhi tūpuna identified in SCHED5 – Sites and Areas of S	Support	Support in part with modifications.	Seeks to amend as follows: Activity status: Permitted Where: PER-1: An agreement is reached with the landowner permitting access and use of resources. Activity status when compliance is not achieved: ~~Not Applicable~~Prohibited Note: The provisions in this rule do not override the provisions of the Trespass Act 1980. There is no general right of public access across private land or right to use private resources.
293.94	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-R2 Buildings and structures within a wāhi tūpuna identified in SCHED5 - Sites and Areas o	Oppose	Opposes inpart, as the 200m^2 threshold lacks justification and may unnecessarily increase consent requirements, while compatible structures that support wāhi tūpuna values should be distinguished. A 6m height limit for buildings and 25m for structures such as silos is supported, and low-rate irrigation infrastructure should be permitted within 100m of limestone cliffs to avoid unintended environmental impacts. The rule should clarify restricted discretionary matters, avoid unnecessary expert assessments, and ensure access, alternatives, and enhancement requirements are practical and proportionate [refer to original submission].	Seeks to amend as follows: Activity status: Permitted Where: PER-1 The building or structure has a maximum building footprint of ~~200~~350m2; and PER-2 The building ~~or structure~~ has a maximum height of 6m as measured from the existing natural ground level; and PER-3 The structure has a maximum height of 25m; and ~~PER-3~~PER-4 The building or structure is not located within 20m of a waterbody

						or 50m of a wetland (excluding farm buildings or farm structures less than 10m2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating);and PER-4PER-5 The building or structure is not located on, or within, 100m of a limestone escarpment (excluding farm buildings or farm structures less than 10m2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating); and ~~PER-5~~PER-6 The building or structure is not located on or within 20m vertical distance of a ridgeline (excluding farm buildings or farm structures less than 10m2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating); and ~~PER-6~~PER-7 The building or structure is located at an elevation less than 900m above sea level (excluding farm buildings or farm structures less than 10m2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating). Matters of discretion are restricted to: 1. whether the relevant rūnaka has been consulted, the outcome of that consultation, and the extent to which the proposal responds to, or incorporates the outcomes of that consultation; and 2. the ~~potential~~ adverse effects on the values of thewāhitūpuna, and the relationship of mana whenuawith thearea, including: a. loss of wāhitūpunaassociations throughmodificationof the landscape and natural processes; and ~~b. damage to the integrity of wāhi tūpuna through disturbance of land and/or indigenous vegetation; and~~ c. disturbance of wāhi tapu and archaeological sites; and d. adverse effects on the ~~integrity~~preservation of tuhituhi neherā sites~~including through disruption of the landform or water balance in the area;~~ and e. adverse effects on the mauri of waterbodies; and f. reduction in the extent and quality of mahikakai; and ~~g. loss of access to mahika kai for customary activities; and~~ 3. effects on sites where there is the potential forkōiwior artefacts to be found, including consideration of the need to impose an accidental discovery protocol or have a cultural monitor present; and ~~4. whether there are alternative methods, locations or designs that would avoid or reduce the impact on the values associated with wāhi tūpuna; and~~

						~~5. the appropriateness of any mitigation measures, including monitoring, planting or improved access for customary use; and 6. whether the proposal provides an opportunity to recognise mana whenua culture, history and identity associated with the wāhi tūpuna, and any potential to:~~ ~~a. affirm the connection between mana whenua and the wāhi tūpuna; or~~ ~~b. enhance the cultural values of the wāhi tūpuna~~ Activity status when compliance is not achieved: ~~Non-Complying~~Discretionary Where: ~~NC-1~~DIS-1 Compliance is not achieved with PER-3, PER-5 and/or PER-6 Notification: Any application made under RDIS-1 and/or NC-1 may be notified to Te Rūnanga o Moeraki
293.95	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-R3 Indigenous vegetation clearance within a wāhi tūpuna, identified in SCHED5 - Sites and	Support	Support with request to modify the rule so it does not discourage landowners from planting new indigenous vegetation, and to allow a permitted pathway for indigenous vegetation removal where landowners have certified Freshwater Farm Plans.	Seeks to amend as follows: PER-1 ... k. improved pasture ... PER-4 The indigenous vegetation was planted after 1st March 2025 and complies with a certified Freshwater Farm Plan.
293.96	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-R4 Earthworks within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significanc	Oppose	Oppose in part as it excludes earthworks for permitted building platforms and would create unnecessary consent requirements for routine activities, especially where SASM overlays cover farm bases and improved pasture with no archaeological value. The submitter suggests either removing SASM overlays from such areas or modifying the rule to increase earthworks thresholds (e.g., to 3m cut and 1,000m^2 area), manage effects through permitted activity criteria, and use boundary setbacks in residential settings, thereby reducing the consent burden while still protecting genuinely sensitive sites.	[refer to original submission for full relief sought] Seeks to amend as follows: [GRUZ/RLZ/OSZ]: PER-3 The permitted activity standards of EW-R1 are complied with; and PER-4 Earthworks are set back 100m from tuhituhi nehera and complies with a certified Freshwater Farm Plan; and PER-5 Earthworks are set back 20m from mahika kai resources; and

						PER-6 Access to mahika kai resources is not obstructed; and ... PER-9 The earthworks are associated with any permitted activity under SASM-R2. [GRZ/SETZ] Where: ~~PER-5~~PER-10 All earthworks where they comply with the following earthworks standards where relevant: 1. EW-S1 Threshold are as [submitting change to 1,000m]. 2. EW-S2 Maximum cut depth and fill height [submitting change to 3m cut and fill depth]; and 3. EW-S4 Earthworks within 20 metres of a waterbody
293.97	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-R5 Urupā within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significance to	Support	Support for existing urupā, but request that new urupā be treated the same as cemeteries due to similar environmental effects, while acknowledging their different cultural and spiritual significance.	Seeks to retain as notified.
293.98	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-R6 Amenity planting and shelterbelts within a wāhi tūpuna, identified in SCHED5 – Sites a	Support	Support but considers specific provision to permit existing shelterbelts within 100m of limestone escarpments is required.	Seeks to amend as follows: Where: PER-1 The new amenity planting or shelterbelt is not located on or within 100m of a limestone escarpment.
293.99	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-R7 Natural hazard mitigation structures within a wāhi tūpuna, identified in SCHED5 - Site	Support	Support with modification to allow a permitted pathway for councils or private applicants to create natural hazard structures, provided iwi are consulted to ensure any permitted activity pathway addresses potential effects on cultural values.	Seeks to consult with iwi regarding effects they wish to manage with SASM-R7 and what a permitted activity pathway could be. Amend as follows: Activity status: ~~Restricted Discretionary~~Permitted PER-1 Fish passage is not impeded. ~~Where:~~ ~~RDIS-1~~ ~~The structures are erected by, or on behalf of, Waitaki District Council, Otago Regional Council, or Canterbury Regional Council.~~ ~~Matters of discretion are restricted to:~~ ~~1. The matters of discretion listed in SASM-R2 RDIS-1.~~

						Notification: Any application made under ~~this rule~~ DIS-1 may be notified to Te Rūnanga o Moeraki.
293.100	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-R8 Agricultural intensification within a wāhi tūpuna, identified in SCHED5 - Sites and Ar	Oppose	No specific reason given.	[refer to original submission]
293.101	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-R9 Commercial outdoor recreation within a wāhi tūpuna, identified in SCHED5 - Sites and A	Support	Support if SASM overlays are adjusted to exclude improved pasture, otherwise, opposes the rule as considers it unnecessarily restricts landowner diversification in less sensitive areas without clear evidence of adverse effects. Considers iwi oversight is justified for archaeological sites, but requiring consent for recreation in non-sensitive areas needs strong justification.	Seeks to delete the rule if the SASM mapping remains.
293.102	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-R10 Plantation forestry activities within a wāhi tūpuna, identified in SCHED5 - Sites and	Support	No specific reason given.	Seeks to retain as notified
293.103	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-R11 Mining activities, farm quarries or quarrying activities within a wāhi tūpuna, identi	Oppose	Oppose in part requesting that farm quarries be excluded from the rule and permitted with appropriate setbacks from sensitive sites, so properties mostly covered by a SASM overlay can still meet operational needs. Considers existing quarries should remain permitted, and the rule could be supported if the overlay mapping is rationalised as submitted.	Seeks to amend as follows: New mining activities, farm quarries or quarrying activities within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significance to Māori Activity status: ~~Discretionary~~Permitted Where: PER-1 The farm quarry is set back 100m from tuhituhi nehera, waterways, limestone escarpments, archaeological sites and cemeteries or urupa. ~~DIS-1~~PER-2 Gravel extraction is required for flood mitigation works. undertaken by a regional council. Notification: Any application made under NC-1~~this rule~~ may be notified to Te Rūnanga o Moeraki.
293.104	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-R12 Cemeteries or crematoria within a wāhi tūpuna, identified in SCHED5 - Sites and Areas	Support	No specific reason given.	Seeks to retain as notified.
293.105	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-R13 Landfills within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significanc	Support	No specific reason given.	Seeks to retain as notified.

293.106	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-R14 Wastewater treatment plants within a wāhi tūpuna, identified in SCHED5 - Sites and Ar	Support	No specific reason given.	Seeks to retain as notified.
293.107	Brock and Gemma Hamilton	Sites and Areas of Significance to Maori	SASM-R15 Planting wilding conifer species within a wāhi tūpuna, identified in SCHED5 - Sites a	Support	No specific reason given.	Seeks to retain as notified.
293.108	Brock and Gemma Hamilton	Earthworks	General	Oppose	Oppose in part noting that small-scale, occasional earthworks are essential for primary production, land management, and health and safety, and are critical to the economic and sustainable management of land and water resources.	No specific relief sought.
293.109	Brock and Gemma Hamilton	Earthworks	EW-O1 Earthworks activities Earthworks activities enable people and communities, social	Support	No specific reason given.	Seeks to retain as notified.
293.110	Brock and Gemma Hamilton	Earthworks	EW-O3 Protecting communities Earthwork activities are undertaken in a manner that maint	Support	No specific reason given.	Seeks to retain as notified.
293.111	Brock and Gemma Hamilton	Earthworks	EW-O2 Protecting sensitive environments Indigenous biodiversity, natural landscapes, natur	Support	Support with modification to clarify and narrow scope by defining “natural landforms,” referencing “Significant Natural Areas” for indigenous biodiversity and aligning references to “natural landscapes” and “natural features” with Outstanding Natural Landscapes and Features, while ensuring existing earthworks in sensitive environments can continue. Considers the objective should also reference ‘Historic and Cultural Values’ for clarity and efficiency and protect long-standing activities like the Oamaru Stone Quarry within sensitive environments.	Seeks to amend as follows: ~~Indigenous biodiversity~~Significant Natural Areas, Outstanding natural landscapes, ~~natural landforms,~~Outstanding natural features, ~~mana whenua~~ and historic and cultural ~~heritage~~ values are protected from the adverse effects of new earthworks.
293.112	Brock and Gemma Hamilton	Earthworks	EW-P1 Enabling earthworks Enable earthworks where the scale, extent and effects are approp	Support	No specific reason given.	Seeks to retain as notified.
293.113	Brock and Gemma Hamilton	Earthworks	EW-P2 Protecting sensitive environments Provide for earthworks where adverse effects on th	Support	No specific reason given.	Seeks to retain as notified.
293.114	Brock and Gemma Hamilton	Earthworks	EW-P3 Conservation activities within sensitive environments Enable earthworks that facilit	Support	No specific reason given.	Seeks to retain as notified.
293.115	Brock and Gemma Hamilton	Earthworks	EW-P4 Primary production activities Enable earthworks that support the operational effi	Support	Support with modification to allow earthworks for installing identified infrastructure and farm buildings, as considers these are managed by existing standards and provide positive environmental effects. Considers enabling primary production activities should be maximised outside sensitive environments, which are already protected by other plan provisions.	Seeks to amend as follows: Enable earthworks that support the operational efficiency of primary production activities, including the construction, maintenance and repair of existing farm tracks, farm buildings, yards, irrigation systems, fences, dams, stormwater

						infrastructure, sedimentation ponds, culverts and stormwater drains.
293.116	Brock and Gemma Hamilton	Earthworks	EW-P5 Construction and maintenance of farm tracks and recreational tracks Enable earthwork	Support	No specific reason given.	Seeks to retain as notified.
293.117	Brock and Gemma Hamilton	Earthworks	EW-P6 Earthworks within the National Grid Yard Enable earthworks within the National Grid	Support	No specific reason given.	Seeks to retain as notified.
293.118	Brock and Gemma Hamilton	Earthworks	EW-P7 The effects of earthworks Manage any earthworks to avoid, remedy or mitigate adve	Support	Support with modification to clarify that effects should be controlled beyond the site boundary and that visual amenity and local amenity values should only apply off-site and in sensitive environments, while removing soil quality as it is a regional council matter.	Seeks to amend as follows: Manage any earthworks to avoid, remedy or mitigate adverse effects on the following: 1. the stability of land, buildings and structures at or beyond the boundary of the site; and 2. the visual amenity values of the site in a sensitive environment, and after rehabilitation; and ~~3. natural landforms; and~~ 4. local amenity values beyond the boundary of the site; and 5. erosion and sediment loss from the site; and ~~6. natural hazard risk; and~~ 7. the stormwater management systems; and 8. dust, lighting, odour, vibration, noise and traffic beyond the boundaries of the site; and ~~9. soil quality.~~
293.119	Brock and Gemma Hamilton	Earthworks	EW-P8 Rehabilitation of disturbed ground Enable earthworks that enhance, restore or rehabi	Support	Support with modification that restoration should not always reflect the surrounding landform and vegetation, but enhancement or rehabilitation may require different approaches such as replacing undesirable species with more suitable ones. Considers the policy should enable positive changes rather than require strict replication of existing conditions.	Seeks to amend as follows: Enable earthworks that enhance, restore or rehabilitate areas of disturbed ground~~to reflect the surrounding landform and vegetation~~.
293.120	Brock and Gemma Hamilton	Earthworks	EW-R1 General earthworks located outside of a sensitive environment All zones Activit	Support	Support with modified standards as detailed below [refer to original submission].	Seeks to retain as notified but with amended standards [refer to original submission]
293.121	Brock and Gemma Hamilton	Earthworks	EW-R2 Earthworks for repair and maintenance activities within or outside of a sensitive enviro	Support	Support with the addition of construction of infrastructure and farm buildings, so that earthworks for house builds or small sheds are permitted without unnecessary extra consent, while large-scale construction remains controlled by existing thresholds.	Seeks to amend as follows: Earthworks for construction, repair and maintenance activities within or outside of a sensitive environment PER-1 ...

						10. farm buildings; and PER-3 Earthworks undertaken for the lawful establishment of: 1. farm tracks; 2. yards; 3. water supply and irrigation systems; 4. fences; 5. dams/ponds; 6. walking and cycling tracks; 7. driveways and accessways; 8. stormwater infrastructure, sediment detention ponds, culverts and stormwater drains; 9. coastal hard protection structures;
293.122	Brock and Gemma Hamilton	Earthworks	EW-R3 Earthworks for the construction of farm tracks, public footpaths, public bridle paths an	Support	Support with amendment to allow wider dairy tracks (at least 6.5–8m) and accommodate larger machinery, as recommended by Dairy NZ and typical for the Waitaki District.	Seeks to amend as follows: Where: PER-1 The track is associated with a permitted or lawfully established activity within the zone and does not exceed ~~4~~8metres in width with an additional allowance of 1 metre either side of the track for battering; and
293.123	Brock and Gemma Hamilton	Earthworks	EW-R4 Earthworks for conservation activities within a sensitive environment All zones	Support	Support with a higher threshold, as considers requiring consent for conservation earthworks in sensitive environments could discourage important activities like fencing SNAs or planting indigenous species.	Seeks to either permit the relevant earthworks thresholds for the underlying zone or increase the threshold within all conservation activities rules. Seeksto amend as follows: Earthworks for conservation activities within a riparian margin or sensitive environment Activity status: Permitted Where: PER-1 ~~On any site earthworks do not exceed 25m2 in area over any 3 year period.~~

						~~PER-2~~ All of the following standards are complied with: 1. EW-S2 Maximum cut depth and fill height; 2. EW-S3 Earthworks on sloping sites; and ~~3. EW-S4 Earthworks within 20m of a waterbody.~~ Activity status when compliance is not achieved: Restricted Discretionary Where: RDIS-1 Compliance is not achieved with ~~PER-2~~ PER-1 Matters of discretion are restricted to: 1. the matters of discretion listed in any of thestandardsEW-S2, EW-S3 and/or EW-S4 that are not complied with. ~~Activity status when compliance is not achieved: Discretionary~~ ~~Where:~~ ~~DIS-1Compliance is not achieved with PER-1~~
293.124	Brock and Gemma Hamilton	Earthworks	EW-R5 Earthworks within a riparian margin All zones Activity status: Permitted Wher	Support	removeduplicationin matters of discretion, permit maintenance of water supply systems, and limit consideration of cumulative effects to those specifically identified.	Seeks to amend as follows: PER-3 ... c. water supply or irrigation systems; Matters of discretion are restricted to: ... 2. the extent and management of adverse effects or cumulative effects on natural character of the riparian margin, including: a. the extent to which the proposed earthworks will: i. allow natural elements to dominate; and ~~ii. introduce man-made elements to the riparian margin; and~~ iii. affect the amenity values of the riparian margin; and iv. create disturbances that will be ...

						~~ix. restrict access for mahika kai purposes; and~~ ~~3. any cumulative effects.~~
293.125	Brock and Gemma Hamilton	Earthworks	EW-R6 Earthworks and land disturbance within the National Grid Yard All zones Activit	Support	No specific reason given.	Seeks to retain as notified.
293.126	Brock and Gemma Hamilton	Earthworks	EW-R7 Earthworks within a sensitive environment All zones Activity status: Discretion	Support	No specific reason given.	Seeks to retain as notified.
293.127	Brock and Gemma Hamilton	Earthworks	EW-S1 Threshold areas (m2) All Residential Zones Rural Lifestyle Zone Settlement Zo	Oppose	Considers that area thresholds are an inadequate tool for managing earthworks as they focus on the size of the activity rather than its environmental impact and effect management should take precedence over area measurement. Considers that thresholds should be used as mattersof discretion or permitted activity criteria, not rigid limits and that the current thresholds are too low, capturing routine activities like house scrapes, silage pits, and shed construction. Also considers that the standards duplicate those in the NFL chapter, regarding landscape effects, which are subjective and undefined outside NFL overlays.	Seeks to remove area thresholds so they default to regional council thresholds and introduce standards or permitted activity criteria to manage the effects of earthworks directly. If threshold areas are to remain seeks to increase threshold to 1,000m2 for all zones. Seeks to amend as follows: Matters of discretion are restricted to: 1. whether ~~the~~ earthworks <u>changing the landform of a ridgeline</u> are of a type, scale and form that is appropriate for the location and anticipated character of the zone; and 2. the management of silt, sediment and erosion on-site; and 3. impacts on ~~character and~~ amenity values <u>beyond the site boundary</u>~~, natural landforms and features~~, including whether the cut face and/or any retaining structures can be concealed behind development or effectively landscaped; and 4.~~visual amenity, including~~ landscape treatment, site reinstatement and screening; and ~~5. the potential for cumulative effects on the natural form of the landscape; and~~ ... ~~Note: A landscape assessment may be required for the assessment of this standard.~~ ...
293.128	Brock and Gemma Hamilton	Earthworks	EW-S2 Maximum cut depth and fill height The cut depth or fill height must not exceed 1	Support	Support for EW-S2 with modification to reduce the number of consents that will be required across the district.	Seeks to amend as follows: 1. The cut depth or fill height must not exceed ~~1.5~~3metres as measured vertically; and

						2. Cut or fill supported by a retaining wall must be setback a distance at least equal to the height of the retaining wall. 3. Cut and fill equal to or less than 0.5m in height is exempt from this standard. 4. Cut and fill for building platforms is exempt from this standard. 5. Earthworks over 1.5m in height or depth that take place within 1.5m of a site boundary require a written approval from the adjoining landowner. ~~Note: Earthworks over 1.5m in height or depth that take place within 1.5m of a site boundary may require a written approval from the adjoining landowner.~~
293.129	Brock and Gemma Hamilton	Earthworks	EW-S3 Earthworks on sloping sites Earthworks must not take place on slopes with an ang	Support	No specific reason given	Retain as notified
293.130	Brock and Gemma Hamilton	Earthworks	EW-S4 Earthworks within 20 metres of a waterbody Earthworks shall not take place withi	Support	Support with modification to reduce consent costs and improve clarity around when ecological or landscape reports are required.	Seeks to amend as follows: Matters of discretion are restricted to: 1. the provision of sediment control techniques to ensure sediment run-off does not enter a waterbody; and 2. effects of earthworks within 5m of the waterbody on the natural character and ecological values of the waterbody; and ~~3. impacts on the character and amenity values, natural landforms and features; and~~ ~~4. management of visual amenity effects through~~ landscape treatment, site reinstatement and screening; and ~~5. the potential for cumulative effects on the natural form of the landscape.~~ Note: A site management plan may be required for consideration of the assessment matter 1. Note: An ecological report ~~and/or landscape assessment~~ maybe required for consideration of matters of discretion (2),~~(3), (4) and (5)~~ in EW-S4.
293.131	Brock and Gemma Hamilton	Earthworks	General	Support	Support the rules, objectives and policies overall especially EW(Q)-P1 for farm quarries, as enabling on-farm aggregate use benefits the environment by reducing road wear and transport emissions.	Seeks to retain as notified.

293.132	Brock and Gemma Hamilton	Earthworks	EW(Q)-P4 Existing quarries Enable the continued operation of existing lawfully established	Support	Support the protection of existing quarries beyond existing use rights, as considers it is critical to avoid excessive consent barriers that could threaten their continued operation, similar tothe challenges faced by landfills.	Seeks to retain as notified.
293.133	Brock and Gemma Hamilton	Earthworks	EW(Q)-R1 Farm quarry General Rural Zone Special Purpose Zone - Macraes Mining Activ	Support	Support with modification, as considers the current restriction on quarrying in sensitive environments is too broad and prevents the benefits of farm quarrying across much of the district. Considers the rule should be proportionate to the scale limits already in place and earthworks in sensitive environments are managed by other chapters.	Seeks to amend as follows: PER-6 The farm quarry is not located within ~~a sensitive environment or within~~ the Coastal Environment or Coastal Natural Hazard overlays.
293.134	Brock and Gemma Hamilton	Earthworks	EW(Q)-R4 Quarrying activities (excluding farm quarry and restricted use quarry) Special	Support	Support with modification for consistency, as the current daily extraction limit of 100m3 is inconsistent with the allowed number of heavy vehicle trips in (CON-4).	Seeks to amend as follows: CON-3 The quantity of aggregate extracted is limited to ~~100m3~~ 200m3 day; and
293.135	Brock and Gemma Hamilton	Earthworks	General	Support	General supportbut considers that quarrying activities currently captured by the mining definition should instead be managed under quarrying provisions to ensure protection for existing quarries.	Seeks to retain as notified but with changes to mineral definition as submitted [refer to submission #298.19].
293.136	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	General	Oppose	Oppose the chapter in part - considers proceeding with identifying new SNAs before the government's review and changes to the NPS-IB will create unnecessary and repeated requirements for landowners and the community, especially given the current suspension of council obligations to identify new SNAs until October 2027.	Seekstoretainthe existing policy and rule framework for managing indigenous biodiversity in the ODP and implement only the requirements of the NPS-IB where SNAs have already beenidentifiedby the current/operative district plan. Seeks to defer the wider chapter review until there is more certainty from government and until such time that the review of the NPS-IB has occurred.
293.137	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-O1 Halt the decline of indigenous biodiversity Halt the decline of the Waitaki Dist	Oppose	Oppose in part, supporting the management of indigenous biodiversity in line with national direction, but seek amendment to focus maintenance and enhancement efforts on significant habitats and fauna, rather than requiring resource-intensive calculations across all zones. Considers theobjectiveshould prioritize consistency with national policy and target significant areas for enhancement where appropriate.	Seeks to amend as follows: ~~Halt the decline~~Manage of the Waitaki District's indigenous biodiversity ~~so there is at least no overall loss, including between species and ecosystems,~~ by maintaining and, where appropriate, enhancing indigenous biodiversity, in areas of mapped significant indigenous habitats and significant fauna (Significant Natural Areas)~~and to achieve this~~ by: 1. protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity while providing for the social, cultural and economic wellbeing of people and communities now and in the future; and 2. recognising the mana of takata whenua ~~as~~to exercise kaitiaki ~~of~~ in relation to maintaining, enhancing and restoring indigenous biodiversity; and 3. recognising people and communities, including landowners, as guardians of indigenous biodiversity.

293.138	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-O2 Identify and protect Significant Natural Areas Areas identified as Significant Natu	Oppose	Oppose in part, seeking modification for clarity and consistency with ECO-O1, and to ensure the objective focuses on the purpose of identifying SNAs, involves transparent partnership with landowners, and does not discourage new indigenous plantings. Considers SNAs should only be identified where indigenous biodiversity already exists as of March 1,2025and the process should recognise the role of sustainable land uses in maintaining significant values and avoid duplicating efforts or undermining trust with landowners.	Seeks to amend as follows: ECO-O2 Identify ~~and protect~~ Significant Natural Areas ~~Areas identified as Significant Natural Areas are protected to ensure no net loss of indigenous biodiversity or indigenous biodiversity values as a result of land use activities.~~ Work with people and communities, including mana whenua and landowners, to identify Significant Natural Areas of indigenous biodiversity established in accordance with the NPS-IB.
293.139	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-O3 Restore or enhance Significant Natural Areas Significant Natural Areas are resto	Support	Support in part, agreeing that restoration and enhancement should be encouraged where appropriate, but also emphasising the need to allow appropriate development where area values can be maintained, as many existing land management practices have already supported significant indigenous habitats and fauna.	Seeks to amend as follows: Existing mapped Significant Natural Areas are restored or enhanced, where appropriate and provision is made for the appropriate subdivision, use and development where the values of the area can be maintained.
293.140	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-P1 Evaluation of Significant Natural Areas Identify the ecological significance of	Oppose	Considers ECO-P1 should be deferred until the government review of the NPS-IB is complete.	Seeks for the deletion of ECO-P1 [refer to original submission for full relief sought] If ECO-P1 is not deleted, seeks to amend as follows: Work with mana whenua and landowners to identify the ecological significance of indigenous vegetation and habitats of indigenous fauna established before 1st March 2025 using; ~~1. the criteria contained in APP5 – Criteria for identifying areas that qualify as Significant Natural Areas (SNA); or~~ 1. The criteria in the NPS IB; or 2. in the case of Crown owned land, Clause 3.8(8) of the National Policy Statement on Indigenous Biodiversity and: ~~3. where they are known and meet the criteria to be SNA's, list them in SCHED6 Significant Natural Areas and on the Planning Maps;~~ ~~3~~. where they are not known,applying the criteria through the resource consent process, notice of requirement, outline plan, or other planning processes, to determine an area's significance; and 4. if a new Significant Natural Area is identified as a result of a resource consent application, include the SNA in SCHED6 – Significant Natural Areas in the next appropriate plan review or plan change notified by Waitaki District Council.
293.141	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-P2 Protection of Significant Natural Areas Except as provided for in clause 2 belo	Support	Support in part, with modification to split into simpler policies for clarity and ensuring sustainable land uses can continue alongside SNAs where effects are managed so landowners can maintain pest control and reinvestment in significant natural areas.	Seeks to amend as follows: 1. Except as provided for in clause 2 below, protect Significant Natural Areas listed in SCHED6 – Significant Natural Areas by: a. ensuring the following adverse effects are avoided, remedied or

						mitigated on the: i. loss of ecosystem representation and extent; .... 2.~~The~~ Manage any adverse effects of subdivision, use and development on identified SNA's ~~shall be managed~~ in accordance with 1.b. above only, in relation to the following activities: a. the new subdivision, use or development is required for the purposes of any of the following: i. construction or upgrade ~~(if the upgrade does not meet the requirements of clause 3.15(2) of the National Policy Statement on Indigenous Biodiversity)~~ of specified infrastructure that provides significant national or regional public benefit: or ... v. there is a functional need or operational need for the new subdivision, use or development to be in that particular location~~;~~ and ~~vi.~~ there are no practicable alternative locations for the new subdivision, use or development;
293.142	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-P3 Appropriate activities within Significant Natural Areas Enable limited - earthw	Support	Support in part - [No specific reason given]	Seeks to amend as follows: Enable limited - ... 3. Is for a lawfully established activity; or 4. The activity as a functional need to be located in the area; or 5. The activity has no more than minor adverse effects on the significant indigenous vegetation of fauna or habitat.
293.143	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-P4 Supporting the maintenance, restoration and enhancement of indigenous biodiversity	Support	Support in part, seeking amendments to recognise that different areas may require different management approaches, that primary production can benefit indigenous biodiversity, and that eco-sourced planting should only be required where justified. Also notes that integrated management across administrative boundaries can only be encouraged, not enforced.	Seeks to amend as follows: ... 3. encouraging, ~~or where appropriate requiring~~, the use of eco-sourced indigenous plantings where it is available; 4.~~ensuring it is managed~~ encourage management in an integrated way, within, and across administrative boundaries; 5. giving effect to the decision-making principles set out in Clause 1.5 of the National Policy Statement on Indigenous Biodiversity; 6. recognising that maintaining indigenous biodiversity ~~requires~~ can be achieved by: a. the maintenance and ~~at least~~no overall reduction of ~~all~~ the following: ...

						7. promoting increased indigenous vegetation cover in both urban environments and non-urban environments where appropriate; 8. requiring that significant adverse effects of activities on indigenous biodiversity (outside of SNA's or on specified Māori land) are managed by applying appropriate thresholds for indigenous vegetation clearance which was established after 1st March 2025, and where these are not met, by applying the biodiversity effects management hierarchy. 9. Recognising the benefits of farm management practices and active management of indigenous biodiversity including voluntary animal and plant pest and stock control and/or formal legal protection.
293.144	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-P5 National priorities for protection Recognise the following national priorities f	Support	No specific reason given.	Seeks to retain as notified.
293.145	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-P6 Impacts of climate change on resilience of ecosystems Take into account the potenti	Support	Support in principle but suggests modifications to align with the NPS-IB by focusing on considering specific, known effects of climate change rather than speculative future impacts.	Seeks to amend as follows: ~~Take into account the potential future impacts~~ Consider the effects of climate change to promote resilience of indigenous biodiversity to climate change: ...
293.146	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-P7 Providing for the relationship of takata whenua with indigenous biodiversity Pro	Support	No specific reason given.	Seeks to retain as notified.
293.147	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-P8 Indigenous vegetation on urban environment allotments Recognise that indigenous	Support	Support with a modification to include 'domestic curtilage' as defined in the plan, to ensure properties with septic tanks that don't meet the 'urban environment allotment' definition aren't unnecessarily subject to the ECO chapter's stricter requirements.	Seeks to amend as follows: Indigenous vegetation on domestic curtilage~~urban environment allotments~~ Recognise that indigenous vegetation on domestic curtilage~~urban environment allotments~~is not protected, unless specifically scheduled in the plan as a Significant Natural Area or Notable Tree.
293.148	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-P9 Precautionary approach Adopt a precautionary approach to considering the adverse	Support	No specific reason given	Seeks to retain as notified.
293.149	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-P10 Provision for maintenance of improved pasture for primary production where it may affe	Support	Support with modifications to improve clarity by removing the subjective requirement for 'adequate evidence' of regular pasture maintenance, as the definition of pasture already implies this. Also consider that the clause excluding improved pasture that has	Seeks to amend as follows: Allow for the maintenance of improved pasture to continue where: 1.~~there is adequate evidence to demonstrate that~~ the maintenance of improved pasture is part of a regular cycle of

					become an SNA is unnecessary and circular, since such areas are already protected under SNA provisions.	periodic maintenance of that pasture; 2. any adverse effects of the maintenance of improved pasture on an identified SNA are no greater in intensity, scale, or character than the effects of activities previously undertaken as part of the regular cycle of periodic maintenance of that pasture; ~~3. the improved pasture has not, itself, become an SNA;~~ ~~4. the land is not an uncultivated depositional landform; and~~ 5. the maintenance of improved pasture will not adversely affect a threatened or at risk (declining) species.
293.150	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-P11 Highly mobile fauna In relation to habitats of highly mobile fauna: identify a	Oppose	Considers the policy should be deferred until the NPS-IB review is complete.	SeekstodeleteECO-P11. If retained, seeks modification to make it consistent with the NPS IB and prevent duplication between territorial authority and regional council [refer to original submission for full relief sought] Seeks to amend as follows: In relation to habitats of highly mobile fauna: 1.Assist the regional council to identify and manage areas outside of SNA's that support specified highly mobile fauna to maintain their populations across their natural range, and improve information and awareness around them; and 2. manage the adverse effects of activities on them, in order to maintain viable populations of specified highly mobile fauna across their natural range.
293.151	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-P12 Restoration of indigenous biodiversity In relation to restoration of indigenous	Support	No specific reason given	Seeks to retain as notified.
293.152	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-P13 Commercial forestry In relation to commercial forestry: the adverse effects of	Support	Support in part with appropriate management of commercial forestry within existing mapped SNA areas.	Seeks to amend as follows: In relation to commercial forestry: 1. the adverse effects of commercial forestry activities in any existing commercial forest on any identified SNA must be managed in a manner that: a. maintains indigenous biodiversity in the identified SNA as far as practicable; while b. providing for commercial forestry activities to continue; and 2. despite ECO-P2, any part of an identified SNA that is within an area of an existing commercial forest that is planted, or is intended to be, replanted in trees for harvest must be managed over the course of consecutive rotations of production in the manner necessary to maintain the long-term populations of any threatened or at risk (declining) species present in the area.
293.153	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-P14 Managing indigenous vegetation outside Significant Natural Areas Avoid signific	Oppose	Considers the policy is overly broad and imposes disproportionate cost and complexity across the district, despite the NPS-IB not requiring territorial authorities to avoid significant adverse effects on indigenous vegetation outside SNAs.	Seeks to delete the provision.

293.154	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-P15 Inappropriate activities within or near to Significant Natural Areas Prohibit t	Support	Support with modification to specify that only deliberate planting is included.	Seeks to amend as follows: Prohibit the deliberate planting of:
293.155	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-R1 Indigenous vegetation clearance outside of a Significant Natural Area listed in SCHED6	Support	Support, in particular the provision permitting indigenous vegetation clearance for existing established activities, provided appropriate thresholds or circumstances are met.	Seeks to retain as notified.
293.156	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-R2 Indigenous vegetation clearance within a Significant Natural Area listed in SCHED6 – Si	Support	Support in part, endorsing clearance of indigenous vegetation where there is a functional need within listed SNAs, but suggesting that minor breaches of permitted activity standards may not always warrant an ecological assessment and this should be reflected in the note.	Seeks to amend note as follows: Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any application made under this provision ~~must provide~~will likely require, in addition to the standard information requirements, an Ecological Assessment, provided by a suitably qualified ecologist, that is commensurate with the scale and significance of the proposal, and meets the requirements of APP8 - ECO Chapter Information Requirements for Resource Consents.'
293.157	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-R3 Earthworks within a Significant Natural Area listed in SCHED6 – Significant Natural Are	Support	Support with modifications to improve practicality by allowing earthworks within mapped SNAs where there is a functional need, and reconsidering the 10 working days' notice requirement, which may not be feasible in cases like emergencies or weather delays. Additionally, minor earthworks exceeding permitted standards may not always justify an ecological assessment, and the note should reflect this flexibility.	Seeksto amend as follows: PER-3 Silt and sediment control measures are in place to prevent discharge of silt and/or sediment into the Significant Natural Area ~~and notice is provided to Council 10 working days prior to the commencement of works.~~ Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any application made under this provision ~~must provide~~ will likely require, in addition to the standard information requirements, an Ecological Assessment, provided by a suitably qualified ecologist, that is commensurate with the scale and significance of the proposal, and meets the requirements of APP8 - ECO Chapter Information Requirements for Resource Consents.
293.158	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-R4 Exotic commercial forestry, agricultural intensification, quarrying activity or mining	Support	No specific reason given	Seeks to retain as notified with Matters of Discretion in the correct column.
293.159	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-R5 Commercial forestry, agricultural intensification, quarrying activity or mining activit	Support	No specific reason given	Seeks to retain as notified
293.160	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-R6 Planting non-indigenous vegetation within a Significant Natural Area listed in SCHED6 –	Support	Support in part, noting that a blanket prohibition on planting non-indigenous vegetation within SNAs could significantly impact existing primary production, and suggesting that such activities should be considered through a resource consent process where adverse effects can be appropriately managed.	Seeks to amend as follows:

						~~Planting~~ Deliberate planting of new non-indigenous vegetation within a Significant Natural Area listed in SCHED6 – Significant Natural Areas Activity status: ~~Prohibited~~ Discretionary
293.161	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-R7 Planting species that result in wilding conifers within a Significant Natural Area, or	Oppose	Oppose in part - should be clarified that only deliberate planting is controlled by ECO-R6 and ECO-R7.	Seeks to amend as follows: ~~Planting~~ Deliberate planting of species that result in wilding conifers within a Significant Natural Area, or within 100m of a Significant Natural Area listed in SCHED6 – Significant Natural Areas
293.162	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-S1 Indigenous vegetation clearance in highly sensitive ecological environments that are no	Oppose	Oppose ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification, and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators.	[Refer to original submission for full relief sought] Seeks to amend as follows: Indigenous vegetation clearance in highly sensitive ecological environments that meet SNA criteria but are not currently identified as Significant Natural Areas Apart from maintenance of improved pasture, there ~~There~~ shall be no indigenous vegetation clearance in the following locations:
293.163	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-S2 Indigenous vegetation clearance in sensitive ecological environments that are not curre	Oppose	Oppose ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators.	[Refer to original submission for full relief sought] Seeks to amend as follows: Indigenous vegetation clearance in sensitive ecological environments that meet SNA criteria but are not currently identified as Significant Natural Areas
293.164	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-S3 Indigenous vegetation clearance in threatened land environments Indigenous veget	Oppose	Oppose ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators.	Refer to original submission for full relief sought] Seeks to amend as follows: Indigenous vegetation clearance in threatened land environments that meet SNA criteria but are not currently identified as Significant Natural Areas.
293.165	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-S4 Indigenous vegetation clearance areas dominated by snow tussock Indigenous vegetati	Oppose	Oppose ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators.	[Refer to original submission for full relief sought] Seeks to amend as follows: Indigenous vegetation clearance areas identified as dominated by snow tussock

293.166	Brock and Gemma Hamilton	Ecosystems and Indigenous Biodiversity	ECO-S5 General indigenous vegetation clearance If not addressed by ECO-S1 to ECO-S4, th	Support	Support ECO-S5 with amendments to ECO-S1 to ECO-S4.	Seeks to retain as notified
293.167	Brock and Gemma Hamilton	Natural Character	General	Support	General support for the chapter with modification to riparian margin definition.	Seeks to retain as notified with amendment to riparian margin definition
293.168	Brock and Gemma Hamilton	Natural Features and Landscapes	General	Support	Support in part but considers the stringent provisions applied to NFL overlays are disproportionate to the land types and the scale of coverage.	Seeks to adjust the overlays so that stringent rules apply only to landscapes that are agreed with landowners as significant or outstanding.
293.169	Brock and Gemma Hamilton	SCHED7 – Schedule of Outstanding Natural Features	ONF29 Outstanding Natural Feature Awamoko Stream Valley/Valley of the Whales Fe	Support	Considers the mapped overlay areas for ONF25 are too broad, and the stringent rules applied to them are disproportionate to the actual landscape characteristics. Considers that reliance on existing use rights is problematic, especially for activities like agricultural intensification, which can lose protection if paused for a year and the plan creates a risk of locking in current land uses, as stopping an activity could trigger a new consent requirement to restart it. Also considers that remote desktop mapping is inadequate and that ground-truthing with landowners has proven more effective and led to better agreement on overlay extents. [refer to original submission for full reasons]	Seeks to amend the boundaries for ONF25 asper map provided in original submission [refer to original submission for relief sought].
293.170	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-O1 Outstanding Natural Features and Landscapes Outstanding Natural Features and Landsc	Support	No specific reason given	Seeks to retain as notified
293.171	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-O2 Significant Natural Features and Rural Scenic Landscapes The values of Significant	Support	Supports in part the objective to protect Significant Natural Features and Rural Scenic Landscapes, but suggests values should be maintained only where appropriate	Seeks to amend as follows: The values of Significant Natural Features and Rural Scenic Landscapes are maintained where appropriate.
293.172	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-O3 Wilding conifers The impact of wilding conifers on Outstanding Natural Features and	Support	Supports in part the objective to reduce the impact of wilding conifers on landscape areas and suggests the policy should encourage reduction of these effects.	Seeks to amend as follows: Encourage the impact of wilding conifers on Outstanding Natural Features and Landscapes, Significant Natural Features, and Rural Scenic Landscapes is be reduced.
293.173	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-O4 Restoration and enhancement of landscapes Outstanding Natural Features and Landscap	Oppose	Opposes the objective as currently worded, arguing that it could result in subjective assessments and requiring restoration and enhancement of landscape values may not always be practicable and suggests limiting the requirement to where practicable.	SeekstodeleteNFL-O4 but seeks to amend as follows if retained: Where practicable, Outstanding Natural Features and Landscapes, Significant Natural Features, and Rural Scenic Landscapes are restored and enhanced, where their values listed in this plan have been lost or degraded.
293.174	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-P1 Identification of Outstanding Natural Features and Landscapes In relation to the	Support	Supports in part the policy for identifying Outstanding Natural Features but recommends using the full Pigeon Bay criteria as current wording omits some of the criteria and could be misleading. Also considers the policy implies changes could occur outside of the plan change or review process.	SeekstodeleteNFL-P1. If retained, seeks to include all Pigeon Bay criteria and an additional requirement to work onsite in consultation with the landowner.

						Seeks also to include a note that changes will only occur through normal plan change or plan review.
293.175	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-P2 Identification of Significant Natural Features and Rural Scenic Landscapes In re	Support	Supports in part the policy for identifying SNF/RSL but recommends using the full Pigeon Bay criteria as current wording omits some of the criteria and could be misleading. Also considers the policy implies changes could occur outside of the plan change or review process.	Seeks todeleteNFL-P2 If retained, seeks to include all Pigeon Bay criteria and an additional requirement to work on site in consultation with the landowner. Seeks also to include a note that changes will only occur through normal plan change or plan review.
293.176	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-P3 Recognise the importance of protecting natural features and landscapes Recognise:	Support	No specific reason given.	Seeks to retain as notified.
293.177	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-P4 Avoiding inappropriate activities on or within Outstanding Natural Features or Landscap	Support	Supports in part the policy to avoid inappropriate activities on Outstanding Natural Features and Landscapes but considers there is ambiguity in the wording and seeks clearer discouragement of critical infrastructure in these areas and more precise identification of values.	Seeks to amend as follows: ~~2. avoids, remedies or mitigates adverse effects on other Outstanding Natural Features and Landscapes values, including avoiding any significant loss of indigenous vegetation.~~ 2. avoids the placement of critical infrastructure within the Outstanding Natural Features and Landscapes unless there is no reasonable alternative due to the functional need for the location and the adverse effects on landscape values can be avoided or appropriately managed.
293.178	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-P5 Avoiding inappropriate activities on or within Significant Natural Features and Rural S	Support	Supports the policy for Rural Scenic Landscapes and Significant Natural Features, but requests clarification that only identified values are protected, to avoid ambiguity.	Seeks to amend as follows: Only provide for subdivision, use and development in Rural Scenic Landscapes and on Significant Natural Features where it: 1.maintains ~~amenity values; and~~ the values identified in SCHED9 - Significant Natural Features and SCHED10 - Schedule of Rural Scenic Landscapes. ~~2. avoids, remedies or mitigates adverse effects on other values of Significant Natural Features or Rural Scenic Landscapes, including avoiding any significant loss of indigenous vegetation.~~
293.179	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-P6 Landscape's ability to absorb change When determining a landscape's ability to abso	Support	Supports the policy but only if other landscape overlays are corrected as requested for ONF029.	Seeks to conditionally retain as notified.
293.180	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-P7 Earthworks within identified natural features and landscapes When determining if ea	Support	Supports the policy but only if other landscape overlays are corrected as requested for ONF029 [ONF025 - refer to submission point 298.169].	Seeks to conditionally retain as notified.
293.181	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-P8 Buildings and structures on or within identified natural features and landscapes Wh	Support	Supports the policy but only if other landscape overlays are corrected as requested for ONF029 [ONF025 - refer to submission point 298.169].	Seeks to conditionally retain as notified.

293.182	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-P9 Subdivision on or within identified natural features and landscapes Avoid subdivisi	Support	Supports the policy but only if other landscape overlays are corrected as requested for ONF029 [ONF025 - refer to submission point 298.169]	Seeks to conditionally retain as notified.
293.183	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-P10 Wilding conifers Avoid the spread of wilding conifers by: prohibiting planting of	Support	Supports the policy but notes there is no incentive for landowners to remove wilding conifers and questions the effectiveness without council support.	Seeks to retain as notified but consider deleting clause (2) if there is no intention of following through.
293.184	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-P11 Enhancement and restoration of Outstanding Natural Features and Landscapes, Significan	Support	Supports in part the policy to enhance and restore landscape areas, but suggests restoration should only occur where appropriate	Seeks to amend as follows: Support the enhancement and <u>where appropriate</u> the restoration of Waitaki's Outstanding Natural Features and Landscapes, Significant Natural Features and Rural Scenic Landscapes where their values have been lost or degraded by:
293.185	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-R1 Buildings and structures (excluding fences) on or within Outstanding Natural Features o	Oppose	Opposes the rule as considers that small-scale farm buildings should be permitted as they are compatible with landscape management. Considers that if the ONF boundaries can be rationalised to only areas that are genuinely natural (not improved pasture) then NFL-R1 could be supported.	Seeks to amend as follows: Activity status: Permitted Where: PER-1 The structure is underground; or <u>PER-2The building or structure is for primary production purposes, excluding residential units; and</u> <u>PER-3</u> <u>The building or structure does not exceed 30m2; and</u> <u>PER-4</u> <u>The building or structure does not exceed 3m in height; and</u> <u>PER-5</u> <u>The building or structure complies with the following standard:</u> <u>1. NFL-S1</u>
293.186	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-R2 Buildings and structures (excluding fences) on or within Significant Natural Features o	Support	Supports in part but considers the rule should allow for minor buildings on Significant Natural Features as per the relief sought in submission point 298.185 or the same thresholds as in RSL.	Seeks to amend as follows: Activity status: Permitted Where: PER-1 The structure is underground; or PER-2

						The building or structure is in a Rural Scenic Landscape ~~(except where it is also located on a Significant Natural Feature)~~; and ...
293.187	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-R3 Permanent fencing on or within Outstanding Natural Features or Landscapes, Significant	Support	Supports in part but considers deer fencing up to 2.5m high be permitted for pest management.	Seeks to amend as follows: PER-2 Any fence or gates are no more than 1.5m high (except any deer fence which can be up to ~~2m~~ 2.5m high).
293.188	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-R4 Earthworks on or within Outstanding Natural Features or Landscapes or Significant Natur	Support	Supports in part but only if improved pasture is removed from ONFL overlays, otherwise, GRUZ earthworks rules should apply. Considers that earthworks are often needed to install tracks to give access for conservation efforts.	Seeks to conditionally retain as notified.
293.189	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-R5 Primary production activities (excluding buildings, mining activities, quarrying activi	Support	Supports the policy with modifications to the definition of agricultural intensification and requests removal of improved pasture from overlays.	Seeks to amend the definition of agricultural intensification and remove improved pasture from ONFL's and SNF's. [refer to original submission for full relief sought]
293.190	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-R6 Amenity planting and shelterbelts on or within Outstanding Natural Features or Landscap	Support	Supports permitting amenity planting and shelterbelts in landscape areas, provided the mapping is accurate.	Seeks to retain as notified.
293.191	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-R7 Outdoor recreational activities (excluding buildings) on or within Outstanding Natural	Support	Supports the rule with modification to exclude not-for-profit and charities from the definition of commercial activities.	Seeks to amend the definition of commercial activities and seeks to add a permitted activity criteria specifically for temporary events, or an advice note advising that the Temporary Events chapter overrides NFL-R7.
293.192	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-R8 Landscape restoration activities on or within Outstanding Natural Features or Landscape	Support	No specific reason given.	Seeks to retain as notified.
293.193	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-R9 Flood protection structures and flood protection works on or within Outstanding Natural	Support	Supports with modification to allow all people, not just councils, to undertake flood protection works.	Seek deletions of PER-1 If retained, seeks to add a note to advise that emergency works are permitted under the RMA.
293.194	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-R10 Plantation Forestry within or on Significant Natural Features or Rural Scenic Landscap	Support	No specific reason given.	Seeks to retain as notified.
293.195	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-R11 Mining activities and/or quarrying activities (excluding existing farm quarries) withi	Support	Supports with modifications to protect existing quarrying and mining activities. [refer to original submission]	Seeks to amend as follows: Mining activities and/or quarrying activities (excluding existing ~~farm quarries~~ quarrying activity) within or on Significant Natural Features or Rural Scenic Landscapes [refer to original submission for full relief sought]

293.196	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-R12 Mining activities and/or quarrying activities (excluding existing farm quarries) on or	Support	Supports with modifications to protect existing quarrying and mining activities. [refer to original submission]	Seeks to amend as follows: Mining activities and/or quarrying activities (excluding existing ~~farm quarries~~ quarrying activity) within or on Significant Natural Features or Rural Scenic Landscapes [refer to original submission for full relief sought]
293.197	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-R13 Intensive indoor primary production and intensive outdoor primary production within or	Oppose	Opposes in part and considers restricted discretionary status is more appropriate instead of non-complying as parts of the RSL may be appropriate, particularly where land is already irrigated and developed.	SeekstoamendNFL-R13 from non-complying activity status to restricted discretionary with the matters of discretion being the same as NFL-R10.
293.198	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-R14 Plantation Forestry on or within Outstanding Natural Features or Landscapes All	Support	No specific reason given.	Seeks to retain as notified.
293.199	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-R15 Planting species that can result in wilding conifers on or within Outstanding Natural	Support	No specific reason given.	Seeks to retain as notified
293.200	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-R16 Intensive indoor primary production and intensive outdoor primary production on or wit	Support	No specific reason given.	Seeks to retain as notified.
293.201	Brock and Gemma Hamilton	Natural Features and Landscapes	NFL-S1 Standards for colours of buildings and structures in landscapes Buildings and st	Support	No specific reason given.	Seeks to retain as notified.
293.202	Brock and Gemma Hamilton	Public Access	PA-O1 Public and customary access Public and customary access is protected, maintained,	Support	No specific reason given.	Seeks to retain as notified.
293.203	Brock and Gemma Hamilton	Public Access	PA-O2 Provision of public access minimises adverse effects Public access to and along t	Support	No specific reason given.	Seeks to retain as notified.
293.204	Brock and Gemma Hamilton	Public Access	PA-P1 Activities that protect and maintain public and customary access Enable activitie	Support	No specific reason given.	Seeks to retain as notified.
293.205	Brock and Gemma Hamilton	Public Access	PA-P2 Mechanisms for improving public access Protect, maintain and enhance public acces	Oppose	Opposes in part the policy encouraging public access opportunities in land use applications but considers it is too ambiguous without rules and could pressure applicants and suggests limiting to esplanade reserves/strips where appropriate through a subdivision process.	Seeks to amend as follows: ~~1. encouraging opportunities and mechanisms to maintain and enhance public access when a land use application provides an opportunity for access; and~~ ~~2.~~1. requiring the creation of esplanade reserves and esplanade strips <u>where appropriate</u> in accordance with the Subdivision

						Chapter, ~~with priority given~~ along the waterways listed in SCHED11 – Priority Areas for Public Access and Esplanade Strips, and lakes larger than 8 hectares.
293.206	Brock and Gemma Hamilton	Public Access	PA-P3 Consideration of adverse effects on public access When considering any applicatio	Support	Supports the policy but considers it should apply only to public land, not private land.	Seeks to amend as follows: When considering any application for resource consents, have regard to any adverse effects of the proposed activity on public access routes and access points <u>on public land.</u>
293.207	Brock and Gemma Hamilton	Activities on the Surface of Water	General	Support	General support for the chapter.	Seeks to retain as notified -except for submission points that follow.
293.208	Brock and Gemma Hamilton	Activities on the Surface of Water	ASW-P2 Commercial activities Provide for commercial surface water activities where it can	Support	Supports the policy for commercial activities on water, with a request to redefine 'commercial activities' as submitted in the definitions chapter.	Seekstoredefine 'commercial activities' as submitted.
293.209	Brock and Gemma Hamilton	Activities on the Surface of Water	ASW-R1 Use of vessels for a recreational activity All zones Activity status: Permitted	Amend	Considers that prescribed noise limits for vessels may create reverse sensitivity for recreational lake use as houses are built nearby and suggests protecting existing uses.	Seeks to amend as follows: PER-2 The following noise limits are not exceeded at a notional boundary established prior to 1st March 2025:
293.210	Brock and Gemma Hamilton	Light	General	Support	Support for the chapter.	Seeks to retain as notified.
293.211	Brock and Gemma Hamilton	Noise	General	Support	No specific reasons given	Retain as notified
293.212	Brock and Gemma Hamilton	Signs	General	Support	General support for the chapter.	Seeks to retain as notified except for the submission points that follow.
293.213	Brock and Gemma Hamilton	Signs	SIGN-R7 Signs attached to a trailer, vehicle or vessel All zones Activity status: Non	Amend	Considers that the rule controlling signs on vehicles/trailers is ambiguous and may cause arbitrary decision-making and suggests clarifying exemptions for company vehicles and business operations.	Seeks to amend as follows: This rule does not apply to: 1~~.an advertising~~ sign painted or adhered directly onto <u>company/fleet</u> vehicles or trailers ~~which is incidental to the primary use of that vehicle or trailer;~~ or 2. an advertising sign painted or adhered directly onto company/fleet vehicles or trailers ~~which are used in the day-to-day operation of that business;~~ or 3. businesses operating from a <u>vehicle.</u>~~Truck or caravan such as food vendors.~~
293.214	Brock and Gemma Hamilton	Temporary Activities	General	Support	Support for chapter with modification to remove the word 'light' from 'light aircraft' as this is not defined. Also refer to submission point on definitions chapter related to 'temporary activities'.	Seeks to replace 'helicopter' and 'light aircraft' with 'aircraft' throughout the chapter.

293.215	Brock and Gemma Hamilton	Temporary Activities	TEMP-R6 Temporary helicopter and light aircraft take-offs and landings, excluding Ōamaru Airpo	Support	Considers that 'helicopter' is not a defined term and should be replaced with 'aircraft' [refer to submission point on definitions chapter related to 'temporary activities']	Seeks to replace ‘helicopter’ and ‘light aircraft’ with ‘aircraft' throughout the chapter.
293.216	Brock and Gemma Hamilton	General Rural Zone	GRUZ-O1 Purpose of the General Rural Zone The General Rural Zone provides for primary p	Support	Support the purpose of the general rural zone for primary production and that the rural zone provides vital socio-economic benefits to the District.	Retain as notified
293.217	Brock and Gemma Hamilton	General Rural Zone	GRUZ-O2 Character of the General Rural Zone The character of the General Rural Zone rem	Support	Support while recognising that odours are managed by the regional council. Support that primary production contributes to open character and maintenance of rural landscapes, and that a degree of built form is necessary to support the ongoing productivity of the rural zone.	Retain as notified
293.218	Brock and Gemma Hamilton	General Rural Zone	GRUZ-O3 Highly productive land The value and long-term benefits of using highly product	Support	Support - managing highly productive land is important to retain and support primary production in the rural environment, particularly where land is identified as being highly productive.	Retain as notified
293.219	Brock and Gemma Hamilton	General Rural Zone	GRUZ-O4 Rural amenity values A range of activities anticipated in the General Rural Zon	Support	Support for objective but considers there should be clearer guidance or a definition of rural amenity values.	Seeks to define 'rural amenity values' as follows: include; open space, primary production, low population and building density, pastoral and arable character interspersed with indigenous biodiversity, relative quietness compared to urban areas, and connection to land for cultural, recreational and historic reasons.
293.220	Brock and Gemma Hamilton	General Rural Zone	GRUZ-O5 Business development in rural areas Rural areas are retained for primary produc	Support	Support - recognition is important for enabling appropriate rural-based business activities that complement the zone’s purpose.	Retain as notified
293.221	Brock and Gemma Hamilton	General Rural Zone	GRUZ-P1 Protection of highly productive land Protect highly productive land for use by	Support	Support - important that identified highly productive land is protected for primary production.	Retain as notified
293.222	Brock and Gemma Hamilton	General Rural Zone	GRUZ-P2 Development in the General Rural Zone Maintain the rural character in the Gener	Support	Support for intent to maintain rural character while allowing flexibility for ancillary activities and existing uses, encouraging appropriate indigenous planting, and enabling quality staff housing and additional dwellings and recognising the diverse residential needs of rural operations without compromising housing standards.	Seeks to amend as follows: ... 4. encouraging the maintenance and enhancement of existing, and the planting of new, indigenous vegetation where appropriate; and 5. providing for conservation activities; and 6. recognising and providing for lawfully established rural activities and minimising reverse sensitivity effects on primary production and ancillary activities of new development in the General Rural Zone; and 7. providing for a ~~single~~ minor residential unit on sites to facilitate residential choice and flexibility ~~while ensuring that the minor residential unit is subservient to the principal residential unit on~~

						~~the site.~~ 8. providing for multiple residential units on large sites to facilitate staff accommodation while ensuring building density is appropriate for the General Rural Zone.
293.223	Brock and Gemma Hamilton	General Rural Zone	GRUZ-P3 Design of development in rural areas Ensure that new development is well design	Support	Support for intent to ensure new development is appropriate for the environment and buildings and structures are necessary to support primary production.	Retain as notified
293.224	Brock and Gemma Hamilton	General Rural Zone	GRUZ-P4 Maintenance of clear urban, rural lifestyle and rural areas Maintain a clear di	Support	Support intent where there is a distinguishment of urban and rural environments but encourage flexibility for primary production activities on the rural fringe where adverse effects can be appropriately managed.	Seeks to amend as follows: Maintain a clear distinction between urban, rural lifestyle and rural areas through the use of clear land use zones and avoidance of ad-hoc subdivision where growth to Settlement or Rural Lifestyle zones has not been planned for unless the adverse effects can be avoided, remedied or mitigated.
293.225	Brock and Gemma Hamilton	General Rural Zone	GRUZ-P5 Intensive primary production Provide for intensive indoor primary production an	Support	Support as important that provision is made for intensive primary production in the rural zone where effects can be appropriately managed.	Retain as notified
293.226	Brock and Gemma Hamilton	General Rural Zone	GRUZ-P6 Integration of primary production with natural and cultural values Recognise th	Support	Support but seeks clarification that sensitive values do not apply across the entire GRUZ zone and recommend limiting specialist reports to identified overlays, and advocate for enabling new primary production activities.	Seeks to amend as follows: Recognise the importance of the identified landscape, heritage, biodiversity and mana whenua values and provide for continued and new primary production in these areas while avoiding, remedying or mitigating any adverse effects on the values.
293.227	Brock and Gemma Hamilton	General Rural Zone	GRUZ-P7 Intensive primary production and extractive industries in close proximity to settlemen	Support	Support intent that any new primary production and extractive industries avoid adverse effects on existing settlements.	Retain as notified
293.228	Brock and Gemma Hamilton	General Rural Zone	GRUZ-P8 Energy and resource efficiency Encourage minimisation of energy and water use a	Support	Support intent to promote energy and resource efficiency where appropriate but notes that the Energy chapter lacks sufficient permissiveness to effectively implement the policy.	Seeks to amend as follows: Encourage minimisation of energy and water use and the use of low impact design such as optimal site layout, passive solar design, solar power and water heating, and greywater recycling for any new development, where appropriate.
293.229	Brock and Gemma Hamilton	General Rural Zone	GRUZ-P9 Outline Development Plans Provide for any substantial development extension of	Support	Support with clarification that recreational, heritage, and ecological values should be limited to those identified in the plan to avoid unnecessary reporting, and suggest using covenants or separation distances to manage adverse effects on new dwellings near the General Rural Zone.	Seeks to amend as follows: ... c. retains and supports the relationship to, and where possible enhances, identified recreational, heritage and ecological features and values; and d. is co-ordinated with the delivery of appropriate infrastructure; and

						e. achieves a high level of amenity; and f. specifies covenants and/or provides a sufficient separation distance of habitable buildings with the General Rural Zone to minimise the potential for reverse sensitivity effects.
293.230	Brock and Gemma Hamilton	General Rural Zone	GRUZ-R1 Building activity General Rural Zone Activity status: Permitted Where: PER-	Support	Support rule to provide for building activity in the rural zone and default to restricted discretionary where compliance cannot be achieved.	Retain as notified
293.231	Brock and Gemma Hamilton	General Rural Zone	GRUZ-R2 Primary production (excluding carbon forestry otherwise provided for in GRUZ-R18, mini	Support	Support rule advocating for the protection of existing mining and quarrying activities in the General Rural Zone and affirm that primary production is appropriately located within this zone.	Seeks to amend as follows: Primary production (excluding carbon forestry otherwise provided for in GRUZ-R18, new mining activity, new quarrying activities, new intensive indoor primary production and new intensive outdoor primary production)
293.232	Brock and Gemma Hamilton	General Rural Zone	GRUZ-R3 Amenity planting and shelterbelts General Rural Zone Activity status: Permitt	Support	Support with amendments to clarify that PER-1 may overly restrict amenity planting due to broad pest species criteria, and that PER-2 should regulate actual effects rather than speculative ones.	Seeks to amend as follows: PER-1 The amenity planting or shelterbelt does not involve planting of species that are, ~~or can become,~~ pest species as identified in any Regional Pest Management Plan; and PER-2 The amenity planting ~~will~~ does not shade any existing adjoining residential unit between the hours of 9:00am and 4:00pm, or any formed public road between 10:00am and 2:00pm, on the shortest day of the year; and...
293.233	Brock and Gemma Hamilton	General Rural Zone	GRUZ-R4 Residential activity General Rural Zone Activity status: Permitted Activity	Support	No specific reason given	Retain as notified
293.234	Brock and Gemma Hamilton	General Rural Zone	GRUZ-R5 Residential unit General Rural Zone Activity status: Permitted Where: PER-1	Support	No specific reason given	Retain as notified
293.235	Brock and Gemma Hamilton	General Rural Zone	GRUZ-R6 Accessory building General Rural Zone Activity status: Permitted Activity s	Support	No specific reason given	Retain as notified
293.236	Brock and Gemma Hamilton	General Rural Zone	GRUZ-R7 Minor residential unit General Rural Zone Activity status: Permitted Where:	Support	Support in part, recommending it apply only to smaller sites, with staff housing for larger farms permitted through other provisions to ensure adequate and appropriate accommodation for rural workers	Retain as notified
293.237	Brock and Gemma Hamilton	General Rural Zone	GRUZ-R8 Visitor accommodation General Rural Zone Activity status: Permitted Where:	Support	Support but recommend amending the five-person limit to better reflect actual building capacity and accommodate larger groups, such as tour parties, where adverse effects can be appropriately managed.	Seeks to amend as follows: PER-1

						The visitor accommodation is limited to homestays accommodating no more than 5 10 visitors at any one time; and
293.238	Brock and Gemma Hamilton	General Rural Zone	GRUZ-R9 Home business (excluding primary production activity) General Rural Zone Acti	Support	Supportfor enabling employment and entrepreneurialism in the rural zone, noting that effects like noise and visual impact are typically well managed through existing provisions, and recommend flexibility for outdoor storage and activities, with screening requirements clearly defined and not overly restrictive.	Seeks to amend as follows: ~~PER-1No more than 40m2 of the gross floor area of all buildings on the site is used for the home business; and~~ ~~PER-2~~PER-1 No more than one full time employee, or equivalent, ~~engaged in~~working at the site of the home business, resides off-site; and ~~PER-3~~PER-2 No more than 2 heavy vehicle movements, and a total of 20 vehicle movements are generated in a 24-hour period for the home business; and ~~PER-4~~PER-3 Any on-site storage of materials associated with the home business is undertaken within buildings on the site, or is screened to a height of at least 1.2m from adjoining roads and sites; and ~~PER-5~~PER-4 The manufacturing, altering, repairing, dismantling or processing of any goods, or articles associated with the home business, take place within a building or is screened to a height of at least 1.2m from adjoining roads and sites.
293.239	Brock and Gemma Hamilton	General Rural Zone	GRUZ-R10 Intensive indoor primary production and intensive outdoor primary production G	Support	Support with modifications toavoid duplication of effluent consent requirements already managed by the Regional Council and recommend aligning any remaining provisions with Regional Council's 150m notification threshold.	Seeks to amend as follows: PER-2 1. housed pigs are located no closer than 500m to a property boundary; and ~~2. no disposal or storage of effluent within 500m of a residential unit on any other site; and~~ 3. no intensive indoor primary production or intensive outdoor primary production of pigs occurs within ~~2 kilometres~~150m of a Residential, Settlement, or Open Space Zone; or PER-3 ... ~~2. no disposal or storage of effluent within 500m of a residential unit on any other site; and~~ 3. no intensive indoor primary production or intensive outdoor primary production of poultry occurs within ~~2 kilometres~~ 150m of a Residential, Settlement or Open Space Zone; or PER-4 For intensive indoor primary production or intensive outdoor primary production of any other species, there is: ~~1. no disposal or storage of effluent within 500m of a residential unit on any other site; and~~

						2. a setback of at least ~~2 kilometres~~ 150m from a Residential, Settlement or Open Space Zone.
293.240	Brock and Gemma Hamilton	General Rural Zone	GRUZ-R11 Recreational activity General Rural Zone Activity status: Permitted Activi	Support	No specific reasons given	no specific reasons given
293.241	Brock and Gemma Hamilton	General Rural Zone	GRUZ-R12 Flood protection structures General Rural Zone Activity status: Permitted	Support	No specific reason given.	Seeks to retain as notified.
293.242	Brock and Gemma Hamilton	General Rural Zone	GRUZ-R13 Conservation activities General Rural Zone Activity status: Permitted Acti	Support	No specific reasons given	Retain as notified
293.243	Brock and Gemma Hamilton	General Rural Zone	GRUZ-R14 Commercial activity General Rural Zone Activity status: Permitted Where: P	Support	Support with amendments to allow farm shops to sell a broader range of locally produced primary goods, ideally within a 100km radius, while maintaining rural character and avoiding expansion into general retail.	Seeks to amend as follows: PER-1 Retail sales are limited to: 1. food sourced from primary production activities within a 100km radius of the site ~~farming produce (including milk, fruit, vegetables, plants, flowers, or eggs) produced on the site, or honey processed on the site; or~~
293.244	Brock and Gemma Hamilton	General Rural Zone	GRUZ-R15 Aeroplane airstrips and helicopter landing areas, and the use of these by aircraft	Oppose	Considers that the aircraft movement limit should be increased to 32 per month for flexibility, and that no limit should apply where sufficient setbacks ensure there are no adverse effects at the nearest boundary.	Seeks to amend as follows: PER-3 The use of the landing area or airstrip is for any other activity which results in no more than ~~8 aircraft movements per week (4 take-offs and 4 landings)~~ 32 aircraft movements per month; or PER-4 The airstrip is more than 1,000m from the nearest notional boundary under different ownership; or ...
293.245	Brock and Gemma Hamilton	General Rural Zone	GRUZ-R16 Papakāika within land held under Te Ture Whenua Māori Act 1993 or within a Native Res	Support	No specific reasons given	Retain as notified
293.246	Brock and Gemma Hamilton	General Rural Zone	GRUZ-R17 Seasonal Worker accommodation General Rural Zone Activity status: Permit	Oppose	Supports the need for seasonal worker housing but oppose limitations that encourage sub-standard accommodation, advocating instead for flexible, self-contained, and higher-quality options that respect the dignity and needs of workers.	Seeks to amend as follows: PER-1 The minor residential unit or building ~~and/or any campsite is~~ only to be used by workers employed on the site; and PER-2 The seasonal worker accommodation is located on a site that is a minimum of 20ha; and ~~PER-3~~ ~~Any building is relocatable or able to be reconfigured to a building~~

						~~accessory to land-based primary production; and~~ ~~PER-4~~ ~~Any seasonal worker accommodation contains no more than one kitchen facility; and~~ PER-5 ~~Any building used for seasonal worker accommodation is no more than 125m2 gross floor area; and~~ PER-6 Any building used for seasonal worker accommodation provides for a maximum of 10 occupants; and ~~PER-7~~ ~~The maximum area used for camping as part of any seasonal worker accommodation shall be 1000m2 and be located at least 100m from any residential unit on an adjoining site.~~
293.247	Brock and Gemma Hamilton	General Rural Zone	GRUZ-R18 Carbon forestry General Rural Zone Activity status: Permitted Where: PER-1	Support	Support with modifications to permit suitable indigenous species for carbon forestry, align setback rules with biodiversity provisions, correct wording around pest species, and remove unnecessary restrictions that conflict with broader plan objectives to enhance native biodiversity.	Seeks to amend as follows: PER-1 The species of planting are indigenous~~ to the ecological district in which the activity is to take place;~~ and ... PER-4 ~~4. within 10m of a Significant Natural Area; and~~ PER-5 The carbon forestry activity~~ does not involve the planting~~avoids an increase in scale or intensity of any pest, pest agent, or organism of interest identified in the relevant Regional Pest Management Plan; and ~~PER-6The carbon forestry utilises no more than 50% of any site.~~
293.248	Brock and Gemma Hamilton	General Rural Zone	GRUZ-R19 Rural Industry General Rural Zone Activity status: Restricted Discretion	Support	Support with more permissive settings to reflect the functional and operational needs of rural industries, noting that site design and infrastructure are developer decisions and that adverse effects are already managed through other chapters in the plan.	Seeks to amend as follows: Activity status: ~~Restricted Discretionary~~Permitted Where: PER-1

						The activity is not a potentially high-impact industrial activity. Note: consent may be required under the Transport chapter. ~~Matters of discretion are restricted to:~~ ~~1. the suitability of the location, site design and layout; and2. the intensity and scale of the activity; and~~ ~~3. the extent of adverse effects on existing or permitted activities; and~~ ~~4. the extent of adverse effects on the safe and efficient operation of the road network, and suitability of onsite loading, manoeuvring and access; and~~ ~~5. the provision of infrastructure to service the activity.~~
293.249	Brock and Gemma Hamilton	General Rural Zone	GRUZ-R20 Papakāika where not otherwise provided for under GRUZ-R16 General Rural Zone	Support	No specific reasons given	Retain as notified
293.250	Brock and Gemma Hamilton	General Rural Zone	GRUZ-R21 Community facility General Rural Zone Activity status: Discretionary Activ	Support	No specific reasons given	Retain as notified
293.251	Brock and Gemma Hamilton	General Rural Zone	GRUZ-R22 Industrial activity General Rural Zone Activity status: Discretionary Acti	Support	No specific reasons given	Retain as notified
293.252	Brock and Gemma Hamilton	General Rural Zone	GRUZ-R23 Any other activity not provided for as a permitted, restricted discretionary, non-com	Support	No specific reasons given	Retain as notified
293.253	Brock and Gemma Hamilton	General Rural Zone	GRUZ-R24 Retirement village General Rural Zone Activity status: Non-Complying Activ	Support	No specific reasons given	Retain as notified
293.254	Brock and Gemma Hamilton	General Rural Zone	GRUZ-R25 Educational facility General Rural Zone Activity status: Non-Complying Act	Oppose	Opposes the non-complying activity status for schools in rural zones and considers that their rural character typically minimises reverse sensitivity risks and that access to education should be balanced with protecting primary production.	Seeks to amend the activity to a permitted activity with appropriate setbacks for buildings for the educational facility or restricted discretionary.
293.255	Brock and Gemma Hamilton	General Rural Zone	GRUZ-S1 Residential site density The maximum density of residential units on any site	Support	No specific reasons given	Retain as notified
293.256	Brock and Gemma Hamilton	General Rural Zone	GRUZ-S2 Maximum height All building and structures must not exceed a maximum height of	Support	Support GRUZ-S2 with amendment to reflect that grain silos can be up to 25m in height.	Seeks to amend as follows: 1. All building and structures must not exceed a maximum height of:

						... 2.~~15m~~25m for grain silos; ...
293.257	Brock and Gemma Hamilton	General Rural Zone	GRUZ-S3 Building coverage The building coverage for any site shall not exceed 20%. Rai	Support	No specific reasons given	Retain as notified
293.258	Brock and Gemma Hamilton	General Rural Zone	GRUZ-S4 Road and rail setbacks A stock loading ramp or race with its entry/exit point	Support	Support with modification to allow stock loading ramps angled to the road, provided there is at least 30m of space to accommodate full off-road parking and maneuvering.	Seeks to amend as follows: 1. A stock loading ramp or race with its entry/exit point located facing a road, including a State Highway, shall not be located within ~~a~~ 30m ~~setback~~ from the road boundary in the direction the loading ramp faces. 2. A stock loading ramp or race with its entry/exit point running parallel or away from~~to~~ the road is exempt from this standard.
293.259	Brock and Gemma Hamilton	General Rural Zone	GRUZ-S5 Internal boundary setbacks The minimum setback of any part of a building or str	Support	No specific reason given	Retain as notified
293.260	Brock and Gemma Hamilton	General Rural Zone	GRUZ-S6 Frontage fencing Any fencing within a road boundary setback or internal bounda	Support	Support with modification to exemptthe curtilage of residential and minor residential units, allowing more residential-style fencing around homes while retaining appropriate rural fencing elsewhere in the zone.	Seeks to amend as follows: 1. Any fencing within a road boundary setback or internal boundary setback shall be post and netting, post and wire, or post and rail fencing. 2. Fencing of residential units and minor residential units is exempt from this standard.
293.261	Brock and Gemma Hamilton	General Rural Zone	GRUZ-S7 Crop protection structures Dark green or black cloth is used for all vertical	Oppose	Considers there should be justification for colour and size restrictions.	Seeks to delete or provide evidence or justification for colour and size restrictions.
293.262	Brock and Gemma Hamilton	General Rural Zone	GRUZ-S8 Hours of operation Any activity (other than a residential activity or visitor	Support	Support intent to limit hours for rural amenity protection but considers the matters of discretion should also address potential reverse sensitivity effects on primary production activities.	Seeks to amend as follows: Matters of discretion are restricted to: ... 2. any adverse effects on the amenity values of properties on any adjoining residential sites; and 3. any reverse sensitivity effects on primary production.
293.263	Brock and Gemma Hamilton	General Rural Zone	GRUZ-S9 Servicing and firefighting water supply and access All new buildings must be c	Oppose	Oppose in part, supporting its intent to ensure buildings are appropriately serviced but recommending flexibility for farm and accessory buildings that do not require reticulated services to avoid unrealistic expectations.	Seeks to amend as follows: 1. All new residential buildings must be connected to reticulated services where these are available; and 2. All new residential buildings must comply with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PA 4509:2008 unless written approval is provided from Fire and Emergency New Zealand regarding an alternative firefighting water supply.

293.264	Brock and Gemma Hamilton	Transport	TRAN-O1 On-site transport facilities and access Use and development has safe and effective	Support	No specific reason given	Retain as notified
293.265	Brock and Gemma Hamilton	Transport	TRAN-O2 High trip generating use and development The safety and efficiency of the transpor	Support	No specific reason given	Retain as notified
293.266	Brock and Gemma Hamilton	Transport	TRAN-O3 Transport network The transport network is effective, accessible and integrated	Support	No specific reason given	Retain as notified
293.267	Brock and Gemma Hamilton	Transport	TRAN-P1 High trip generating use and development Provide for high vehicle trip generato	Support	Support with modification to clarify the term 'surrounding area' in Point 5, as it is currently vague and may lead to inconsistent interpretation.	Seeks to amend as follows: ... 5. the effect of the proposed activity on the character and amenity values of the surrounding ~~area~~ adjoining sites; and ...
293.268	Brock and Gemma Hamilton	Transport	TRAN-P2 Appropriate on-site transport facilities Enable on-site transport facilities where	Oppose	Opposes the policy as it addresses only on-site effects and considers that internal site use is typically managed by landowners and industry standards, and that provisions should focus on impacts beyond the site to align with TRAN-O1 and avoid unnecessary safety risks.	Seeks to amend as follows: Enable on-site transport facilities where these: 1. meet industry standards; and 2. are of a location and design that provides for: a. public health and safety; and ~~b. the safe and efficient use of the site; and~~ c. the safe and efficient functioning of the transport network; and d. the reasonable loading and access demands generated by the use of the site; and e. the safe and effective access for firefighting purposes. ~~3. promote the uptake and use of the active transport network.~~
293.269	Brock and Gemma Hamilton	Transport	TRAN-P3 Potentially appropriate on-site transport facilities Only allow for on-site tra	Oppose	Considers the policy unnecessary as relevant matters are already addressed unless they regulate internal effects. Considers it should focus solely on firefighting access and remove provisions targeting off-site effects.	Amend as follows: Only allow for on-site transport facilities that do not meet industry standards where it can be demonstrated, if applicable, that: ~~1. the design is in response to site and/or topographical constraints; and~~
293.270	Brock and Gemma Hamilton	Transport	TRAN-P4 Vehicle crossings Provide for safe and efficient connections between the transp	Support	Support to the extent that it applies to new vehicle crossings.	Seeks to amend as follows: Provide for safe and efficient connections between the transport network and on-site transport facilities by requiring new vehicle crossings to roads to address:

						...
293.271	Brock and Gemma Hamilton	Transport	TRAN-P5 Regionally Significant Infrastructure Recognise the social, economic, cultural	Support	Support, particularly the definition of Regionally Significant Infrastructure.	Retain as notified
293.272	Brock and Gemma Hamilton	Transport	TRAN-P6 Multi-modal and active transport Encourage activities to incorporate opportunitie	Oppose	Considers to be overly strong in wording and that cycling/pedestrian modes are more hazardous and should not be encouraged where full cycling infrastructure is not available.	Seeks to amend as follows: ~~Encourage~~ Promote activities to incorporate opportunities for multi-modal and active transport, including cycle parking and end of trip facilities if the site is served by the active transport network where it separates cyclists and pedestrians.
293.273	Brock and Gemma Hamilton	Transport	TRAN-P8 Upgrading of the transport network Provide for the upgrading or development of	Support	Considers clearer guidance needed on when to respond to earthworks effects, suggesting the policy be limited to landscape and ecological values identified in overlays and chapters of the plan.	Seeks to amend as follows: ... 8. responds to site and topographical constraints including opportunities to reduce the effects of earthworks on identified landscape and ecological values. ...
293.274	Brock and Gemma Hamilton	Transport	TRAN-P9 Roads as infrastructure corridors Encourage the use of roads as infrastructure	Support	No specific reason given	Retain as notified
293.275	Brock and Gemma Hamilton	Transport	TRAN-P10 Road classification Classify roads according to their function and anticipated	Support	No specific reason given	Retain as notified
293.276	Brock and Gemma Hamilton	Transport	General	Oppose	Considers that rural zones should be exempt from policies that may pressure developers to fund cycle and footpaths where they offer no practical benefit and seeks clarification that policies apply only to new activities, noting that technical evidence from the WDC roading department is needed to support provisions for road crossings.	Seeks to have submission points considered across all TRAN provisions and for the roading department to reply to this submission at further hearings commenting on the TRAN chapter overall.
293.277	Brock and Gemma Hamilton	Transport	TRAN-R1 Vehicle crossings onto roads All zones Activity status: Permitted Where: PE	Support	Support for new vehicle crossings subject to submission point*298.276*. [*list previous submission point #]	Seeks to amend as follows: TRAN-R1 New Vehicle crossings onto roads
293.278	Brock and Gemma Hamilton	Transport	TRAN-R2 Site access for activities without any on-site vehicle parking space or loading spaces	Support	Support with modifications to clarify that pedestrian and cycling access requirements should not apply in zones where vehicle travel is operationally necessary, such as due to distance.	Seeks to amend as follows: TRAN-R2 Site access for new activities without any on-site vehicle parking space or loading spaces

						PER-1 All of the following standards are complied with where relevant: 1. TRAN-S1 Pedestrian and cycling access in Residential Zones; 2. TRAN-S2 Firefighting access
293.279	Brock and Gemma Hamilton	Transport	TRAN-R3 On-site parking, loading, and access All zones Activity status: Permitted W	Oppose	Considers the provision overregulates internal site effects unrelated to the transport network, particularly dairy lanes and private access already covered under TRAN-S3, and finds TRAN-S5 overly restrictive by limiting vehicle standing, queuing, and manoeuvring within a site that are inherent and internal and should not be subject to standards.	Seeks todeleteTRAN-S7 and TRAN-S8 from the rule.
293.280	Brock and Gemma Hamilton	Transport	TRAN-S9 Accessible parking spaces Where parking spaces are provided on site: any on-si	Support	Support subject to submissions from disability advocate organisations, particularly with reference to rural sites.	Retain as notified
293.281	Brock and Gemma Hamilton	Transport	TRAN-S10 Design requirements for on-site vehicle parking spaces Where parking spaces ar	Oppose	Considers the managing of internal site effects inconsistent with TRAN-O1 and recommends it be amended to clarify that it does not apply to rural or residential zones.	Seeks to provide clarification that the standard does not apply to rural and residential zones.
293.282	Brock and Gemma Hamilton	Transport	TRAN-S11 Surface of parking and loading areas The surface of all parking and loading a	Oppose	Considers that setting a low car park threshold would place undue burden on rural zones, and that regulating internal site effects is inconsistent with TRAN-O1.	Seeks to provide clarification that the standard does not apply to rural and residential zones
293.283	Brock and Gemma Hamilton	Transport	TRAN-S12 On-site cycle parking All developments, excluding residential units and prima	Amend	Considers that while TRAN-S12 excludes primary production, it should also exclude rural zones due to long travel distances and lack of separated cycleways, noting that many related standards are similarly irrelevant in rural contexts.	Seeks to provide clarification that the standard does not apply to rural zones.
293.284	Brock and Gemma Hamilton	Transport	TRAN-S12 On-site cycle parking All developments, excluding residential units and prima	Oppose	Considers standard to be overly prescriptive regarding the standard of cycle parking.	Seeks to provide clarification that the standard does not apply to rural and residential zones
293.285	Brock and Gemma Hamilton	Transport	TRAN-R3 On-site parking, loading, and access All zones Activity status: Permitted W	Oppose	Opposes incorporating Australian and New Zealand Standards by reference in the district plan due to their cost, copyright restrictions, external review processes, and inefficiency and considers the PDP should include locally specified standards to avoid financial barriers and regulatory outsourcing.	Seeks to use standards acceptable to the WDC roading department which are written into the plan to be freely available. Delete TRAN-R3. Alternatively, if retained sees to amend as follows All zones except Rural Lifestyle Zone, General Rural Zone, Macraes Mining Zone and Settlement Zone. PER-1 All of the following standards are complied with where relevant; 1. TRAN-S2 Firefighting access; ~~2. TRAN-S3 Service lanes, private ways, private roads, pedestrian accessways and walkways;~~ ~~3. TRAN-S4 Reverse manoeuvring;~~ ~~4. TRAN-S5 Design standards for vehicle manoeuvring areas;~~

						5. TRAN-S6 Service stations and truck stops; ~~6. TRAN-S7 On-site loading spaces for non-residential activities;~~ ~~7. TRAN-S8 Design requirements for loading and vehicle standing spaces;~~ 8. TRAN-S9 Accessible parking spaces; ~~9. TRAN-S10 Design requirements for on-site vehicle parking spaces;~~ ~~10. TRAN-S11 Surface of parking and loading areas;~~ ~~11. TRAN-S12 On-site cycle parking.~~ Matters of discretion are restricted to: 1. the matters of discretion listed in any of the standards TRAN-S2,~~TRAN-S3, TRAN-S4, TRAN-S5~~, TRAN-S6,~~TRAN-S7, TRAN-S8~~,TRAN-S9,~~ TRAN-S10, TRAN-S11, and/or TRAN-S12~~ that are not complied with.
293.286	Brock and Gemma Hamilton	Transport	TRAN-R4 Vehicle trip generating activities All zones Activity status: Permitted Whe	Support	Supports with changes to reduce the consent threshold and controlling the activity directly by the number of traffic movements rather than using proxies like gross floor area.	Retain as notified with changes to Table 6 - High Trip Generator Thresholds.
293.287	Brock and Gemma Hamilton	Transport	TRAN-R5 Walkways, cycleways and shared paths which are located on public land other than a roa	Support	Support with amendment to replace the Austroads Guide with a specific standard to ensure oversight of future changes is under WDC control.	Seeks to retain as notified with changes toTRAN-S20.
293.288	Brock and Gemma Hamilton	Transport	TRAN-R6 Extensions and new vehicle access tracks ancillary to infrastructure, outside of any o	Support	Support with amendment to apply within overlays as extensive coverage of the Rural Scenic and Outstanding Natural Landscapes overlays makes it overly restrictive if excluded and considers infrastructure access should take precedence over overlay values without requiring consent or incurring additional costs.	**Seeks to** amend as follows: TRAN-R6 Extensions and new vehicle access tracks ancillary to infrastructure, ~~outside of any overlay~~
293.289	Brock and Gemma Hamilton	Transport	TRAN-S3 Service lanes, private ways, private roads, pedestrian accessways and walkways	Support	Support if restricted to public ways only and specifies a standard rather than requiring purchase of the standard.	Seeks to amend as follows: TRAN-S3 Service lanes,~~, private ways, private roads~~pedestrian accessways and walkways <u>on public land.</u> 1. Service lanes, private ways, private roads, pedestrian accessways and walkways <u>on public land</u> must be designed and constructed in accordance with[describe standards here] ~~NZS 4404:2010 Land Development and Subdivision Infrastructure; except where Table 7 Minimum legal widths and formation requirements for private ways/vehicle access lots replaces the formation requirements of private ways for residential units detailed in NZS 4404:2010.~~
293.290	Brock and Gemma Hamilton	Transport	TRAN-S5 Design standards for vehicle manoeuvring areas Areas must be provided on a sit	Oppose	Considers the standard overly restrictive by requiring all vehicle standing, queuing, and manoeuvring to occur entirely within a site, including areas inherently used for such purposes, making on-street parking non-compliant and imposing internal site controls unrelated to TRAN-O1.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. Areas must be provided on a site for vehicles to stand, queue and make all necessary manoeuvres on site without using the

						road or State Highway, ~~and without using the area provided for parking space, servicing, loading space or outdoor storage purposes; and~~ ...Matters of discretion are restricted to: 1. the safety and movement of pedestrians, cyclists, public transport and general traffic on the road corridor.
293.291	Brock and Gemma Hamilton	Transport	TRAN-S7 On-site loading spaces for non-residential activities The number of loading sp	Oppose	Considers the standard inappropriate for rural contexts and that it imposes unnecessary discretion over loading needs best determined by the operator. Also considers that it relies on outdated and inaccessible standards and should instead include explicit provisions within the plan.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. The number of loading spaces for any non-residential activity must not be less than that shown in Table 8 – Minimum loading space requirements for non-residential activities below and must be provided on-site, except in the Town Centre Zone and rural zones. ... 3. Neither Clause 1 or 2 above apply to sites of less than 50m2 that are used for infrastructure purposes, or to primary production. Matters of discretion are restricted to: 1. the effective, efficient and safe operation of the transport network; and ~~2. the identified loading needs of the activity.~~
293.292	Brock and Gemma Hamilton	Transport	TRAN-S8 Design requirements for loading spaces and vehicle standing spaces Loading spa	Oppose	Considers the standard inappropriate for rural conditions and imposes unnecessary discretion over loading needs. Also considers the standard relies on outdated and inaccessible standards, and should instead include clear, explicit provisions within the plan.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. Loading spaces and vehicle standing spaces required under TRAN-S5 must be designed, constructed and maintained in accordance with [produce a specific standard in the text here]. ~~AS 2890.2.2002 Parking facilities Part 2: Off-street commercial vehicle facilities, for the specified minimum design vehicle.~~ Matters of discretion are restricted to: 1. the effective, efficient and safe operation of the transport network; and ~~2. the identified loading and vehicle space needs of the activity.~~
293.293	Brock and Gemma Hamilton	Transport	TRAN-S9 Accessible parking spaces Where parking spaces are provided on site: any on-si	Support	Support subject to submission(s) from disability advocate organisations, particularly regarding application to rural zones.	Seeks to retain with any amendments requested by disability advocate organisations and disabled people.

293.294	Brock and Gemma Hamilton	Transport	TRAN-S10 Design requirements for on-site vehicle parking spaces Where parking spaces ar	Oppose	Considers the standard imposes design requirements that are unclear or unsuitable for rural and residential contexts and regulates internal site effects inconsistent with TRAN-O1.	Seeks to amend as follows: Where parking spaces are provided on a site: 1. car parking must comply with the requirements of [provide standard here] ~~AS 2890.1:2004 Parking facilities Part 1: Off-streetcar parking,~~ except for: a. a parking space in a garage or carport; or b. staff parking that is provided as stacked parking of no more than two vehicles, or c. parking for residential or primary production activity. ...
293.295	Brock and Gemma Hamilton	Transport	TRAN-S11 Surface of parking and loading areas The surface of all parking and loading a	Oppose	Considers the standard imposes unnecessarily low thresholds and surface requirements on parking and loading areas in rural and residential zones, regulates internal site effects inconsistent with TRAN-O1, and conflicts with permitted pathways for multiple residential units.	Seeks to delete or include as advice note. Alternatively, seeks to amend as follows: 1. The surface of ~~all~~ parking and loading areas must either be: ... 2. Clause 1 does not apply where a site contains parking for ~~one~~ residential units or primary production activity.
293.296	Brock and Gemma Hamilton	Transport	TRAN-S12 On-site cycle parking All developments, excluding residential units and prima	Oppose	Considers the standard inappropriately applies cycle parking requirements in rural areas where cycling is impractical and potentially unsafe and is overly prescriptive in its design standards.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. All developments, excluding residential units and primary production, ~~must~~ should provide cycle parking at a rate of 1 cycle parking for every 10 car parking spaces provided; and 2. cycle parking ~~must~~should meet the following minimum specifications: a. cycle parking facilities must should be: i. signposted or visible to cyclists entering the site; and ~~ii. located as close as possible to, and no more than 15m from at least one main pedestrian public entrance to the building/activity; and~~ iii. located so they do not impede pedestrian thoroughfares, including areas used by people whose mobility or vision is restricted; and iv. clear of vehicle parking or manoeuvring areas; ~~b. cycle parking facilities must be available during the activity's hours of operation and must not be impeded by any structure, storage of goods, landscape planting or other use; and~~ ~~c. long stay cycle parking facilities (for staff or residents) must be located:~~ ~~i. in a covered area; and~~ ~~ii. in an area where access by the general public is generally excluded.~~

						~~Note: Refer to the Austroads Bicycle Parking Facilities: Guidelines for design and installation: October 2-16 (AP-R527-16).~~ Matters of discretion are restricted to: ...4. whether cycling is a safe method of transport to the site.
293.297	Brock and Gemma Hamilton	Transport	TRAN-S13 Width and number of vehicle crossings onto roads Every lot with direct vehicl	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
293.298	Brock and Gemma Hamilton	Transport	TRAN-S14 Formation and sealing of vehicle crossings All vehicle crossings onto a seale	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
293.299	Brock and Gemma Hamilton	Transport	TRAN-S15 Distance between vehicle crossings and road intersections the distance betwee	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
293.300	Brock and Gemma Hamilton	Transport	TRAN-S16 Sight distances from vehicle crossings Any vehicle crossing onto a road other	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
293.301	Brock and Gemma Hamilton	Transport	Table 6 – High trip generator thresholds	Support	Supports the thresholds with modification to raise the lower limits, as considers there is no technical evidence supporting the current thresholds and managing effects through vehicle movements is more appropriate. Also considers that valuable services such as emergency, healthcare, education, recreation, and community facilities should be given higher permitted thresholds to reduce consent barriers and better reflect their social importance.	Seeks to incorporate management of the effects from publicly owned or funded educational facilities managed by TRAN-R8 when a road needs upgraded to meet effects from an exceeded threshold. [refer to original submission for full relief sought]
293.302	Brock and Gemma Hamilton	Transport	Table 7 – Minimum legal widths and formation requirements for private ways/access lots	Oppose	Considers the table unnecessarily duplicates TRAN-S2 by applying minimum legal widths and formation requirements to private ways, manages only internal site effects, and relies on inaccessible standards without supporting technical evidence.	Seeks to amend as follows: Table 7 – Minimum legal widths and formation requirements for ~~private ways/~~access lots
293.303	Brock and Gemma Hamilton	Energy	General	Oppose	Considers that the chapter does not adequately reflect the benefits and low environmental impact of renewable energy and places excessive consent burdens on activities that should be encouraged, especially those generating electricity at the point of consumption to reduce demand on large-scale infrastructure.	Seeks for the chapter to reflect the benefits and low environmental impact of renewable energy and to reduce consent burdens on these activities [inferred relief requested].
293.304	Brock and Gemma Hamilton	Energy	ENG-O1 Recognising the benefits of renewable electricity generation The significant local,	Support	No specific reasons given	Retain as notified
293.305	Brock and Gemma Hamilton	Energy	ENG-O2 Design and location of renewable electricity	Support	No specific reasons given	Retain as notified

			generation Renewable electricity ge			
293.306	Brock and Gemma Hamilton	Energy	ENG-O3 Protecting the values and qualities of any overlay Waitaki District's overlays a	Oppose	Considers that not all overlays are equal and not all renewable energy methods are equal.	Seeks to amend as follows: ENG-O3 Protecting the values and qualities of ~~any~~ overlay Waitaki District's overlays are protected as far as practicable from ~~the~~any significant adverse effects of renewable electricity generation activities.
293.307	Brock and Gemma Hamilton	Energy	ENG-P1 Recognising the benefits of renewable electricity generation Recognise the local, r	Support	No specific reasons given	Retain as notified
293.308	Brock and Gemma Hamilton	Energy	ENG-P2 Existing activities Enable the ongoing refurbishment, maintenance and repair, an	Support	No specific reasons given	Retain as notified
293.309	Brock and Gemma Hamilton	Energy	ENG-P3 Effects on renewable electricity generation activities Only allow new sensitive act	Support	No specific reasons given	Retain as notified
293.310	Brock and Gemma Hamilton	Energy	ENG-P4 Small scale renewable electricity generation activities and investigation activities ou	Support	Oppose in part the Canterbury Flood Overlay due to elevation-based anomalies and mapping inaccuracies, particularly around Maerewhenua River, Grants Rd, Little Rd, and Dip Hill Rd, and considers that this raise doubts about the overlay's validity and consistency with known plan errors such as those at Ōmārama.	Seeks fora review of the Canterbury Flood Assessment overlay mapping.
293.311	Brock and Gemma Hamilton	Energy	ENG-P5 Small scale renewable electricity generation activities and investigation activities in	Oppose	Supports with amendments to also enable small scale renewable electricity generation activities within overlays, particularly extensive overlays such as ONL and RSL where entire properties are affected. Considers energy-related overlays (e.g., National Grid yard, Waitaki Power Scheme) should not restrict renewable energy generation and that natural hazard overlays are generally irrelevant to renewable energy effects beyond structural limitations. Considers small-scale renewable energy generation should be enabled across all overlays, with large-scale activities controlled only within identified overlays. Also considers that the PDP should "recognise and provide for" small-scale renewable electricity generation to align with the NPS-REG.	Seeks to amend as follows: ENG-P4 Small scale renewable electricity generation activities and investigation activities ~~outside of overlays~~ ~~Enable~~Recognise and provide for small scale renewable electricity generation activities and activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation activities, ~~where:~~ ~~1. it is of a form, location and scale that minimises adverse effects on the environment; and~~ ~~2. it is consistent with the anticipated amenity values and character of the zone; and~~ ~~3. where it is demonstrated that all adverse effects on an overlay cannot be avoided, it appropriately offsets or compensates the adverse effects.~~

						Seeks to amend as follows: ENG-P4 Small scale renewable electricity generation activities and investigation activities ~~outside of overlays~~ ~~Enable~~ Recognise and provide for small scale renewable electricity generation activities and activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation activities, ~~where:~~ ~~1. it is of a form, location and scale that minimises adverse effects on the environment; and~~ ~~2. it is consistent with the anticipated amenity values and character of the zone; and~~ ~~3. where it is demonstrated that all adverse effects on an overlay cannot be avoided, it appropriately offsets or compensates the adverse effects.~~
293.312	Brock and Gemma Hamilton	Energy	ENG-P6 Large scale renewable electricity generation activities Provide for large scale	Support	Considers that small-scale renewable energy generation should be provided for under the NPS-REG as its effects are minor and existing overlay chapters already manage structural impacts. Considers that discouraging such activities may lead to greater reliance on large-scale projects with more significant effects.	Seeks to delete the policy. Alternatively, seeks to amend as follows: ~~Only allow~~ Recognise and provide for small scale renewable electricity generation activities and activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation activities within an overlay where: 1. if located on buildings, items and sites identified in SCHED2 – Historic Heritage Items, SCHED3 – Character Contributing Buildings and non-contributing buildings where the building is a character contributing building, and SCHED5 – Sites and Areas of Significance to Māori: a. its location is sympathetic to the identified values where practicable; and b.~~any structure is not visible from any adjoining public place and~~ where practicable, is aligned with the plane of the roof where located on a roof; 2. if located within the root protection area of a tree identified in SCHED4 - Notable Trees, the work will not likely compromise the long-term health, natural life or values of the Notable Tree; ... ~~5. it is demonstrated that all adverse effects on the values of the relevant overlay cannot be avoided, it appropriately offsets or compensates the adverse effects.~~
293.313	Brock and Gemma Hamilton	Energy	ENG-P7 Large scale renewable electricity generation activities in other zones and within overl	Support	Considers that large scale activities have more significant effects and it is appropriate to manage them.	Retain as notified
293.314	Brock and Gemma Hamilton	Energy	ENG-P8 New technology Recognise the opportunity for	Support	Considers that large scale activities have more significant effects and itis appropriate to manage them.	Retain as notified

			new technology in renewable electri			
293.315	Brock and Gemma Hamilton	Energy	ENG-P9 Decommissioning of renewable electricity generation activities Require that, during	Support	No specific reasons given	Retain as notified
293.316	Brock and Gemma Hamilton	Energy	ENG-R1 The operation, maintenance, and refurbishment of existing renewable electricity generat	Support	No specific reasons given	Retain as notified
293.317	Brock and Gemma Hamilton	Energy	ENG-R2 The operation, maintenance, and refurbishment of existing renewable electricity generat	Support	No specific reasons given	Retain as notified
293.318	Brock and Gemma Hamilton	Energy	ENG-R3 Small scale renewable electricity generation activities outside of an overlay Al	Support	No specific reasons given	Retain as notified
293.319	Brock and Gemma Hamilton	Energy	ENG-R4 Investigation activities outside of an overlay All zones Activity status: Perm	Support	Support but considers it should also apply within overlays subject to the provisions of the relevant chapter in that overlay.	Seeks to amend as follows: ENG-R3 Small scale renewable electricity generation activities ~~outside of an overlay~~
293.320	Brock and Gemma Hamilton	Energy	ENG-R5 Small scale renewable electricity generation activities and investigation activities in	Oppose	No specific reasons given	Retain as notified
293.321	Brock and Gemma Hamilton	Energy	ENG-R6 Small scale renewable electricity generation activities and investigation activities wi	Support	Considers small-scale renewable generation should be permitted activities as they are low impact and a restricted discretionary status adds disproportionate costs that discourage such activities and conflict with the NPS-REG.	Seeks to delete the rule and manage with ENG-R3. Alternatively, seeks to amend to a controlled activity [refer to original submission for full relief sought]
293.322	Brock and Gemma Hamilton	Energy	ENG-R7 Large scale renewable electricity generation activities General Rural Zone Act	Oppose	No specific reasons given	Retain as notified
293.323	Brock and Gemma Hamilton	Energy	ENG-R8 Other renewable electricity generation activities not otherwise provided for All	Oppose	Considers that renewable energy as a non-complying activity across overlays contradicts the NPS-REG, especially where overlays are intended for energy generation, and given that adverse effects are already managed by other chapters, the activity should be (restricted) discretionary.	Seeks to amend as follows: Activity status: <u>Restricted</u> Discretionary [refer to original submission for full relief sought]
293.324	Brock and Gemma Hamilton	Energy	ENG-S1 Small scale solar panels All zones The panel must not exceed the permitted bu	Support	Considers the rule is unclear in scope and appears to pre-emptively control assumed future effects without justification and this will discourage innovation and renewable energy generation contrary to the NPS-REG. Considers any necessary controls	Seeks to delete ENG-R8 and manage the effects within the relevant zone or overlay chapter.

					should be addressed in relevant chapters only when actual effects are known.	
293.325	Brock and Gemma Hamilton	Energy	ENG-S2 Small scale roof mounted wind turbines All zones The turbine (including the f	Support	No specific reasons given	Retain as notified
293.326	Brock and Gemma Hamilton	Energy	ENG-S3 Small scale freestanding wind turbines General Rural Zone Special Purpose Zo	Support	No specific reasons given	Retain as notified
293.327	Brock and Gemma Hamilton	Energy	ENG-S4 Small scale hydro generators General Rural Zone Rural Lifestyle Zone Industr	Support	No specific reasons given	Retain as notified
293.328	Brock and Gemma Hamilton	Earthworks	EW(Q)-S2 Setback from a site boundary General Rural Zone Special Purpose Zone – Macra	Support	Supports with amendments as the 200m^2 limit is too restrictive for stored water and the dam height is better regulated under the Dam Safety Regulations 2022. Considers the matters of discretion vague, such as 'suitability of the site' and lack clarity and justification, especially when many dams relate to existing water bodies or irrigation systems.	Seeks to amend as follows: 1. The maximum surface area of any stored water <u>solely for hydro electricity</u> does not exceed 200m2; and 2. the maximum height of a weir or dam <u>solely for hydro electricity</u> does not exceed 2m; and 3. the maximum installed capacity does not exceed 4 megawatts (MW). Matters of discretion are restricted to: ... ~~3. the suitability of the site for the proposed activity; and~~ ...
293.329	Brock and Gemma Hamilton	NOIC – North Otago Irrigation Company Limited	North Otago Irrigation Scheme Designation Unique Identifier NOIC-1 Designation P	Support	Support the designation.	Seeks to retain as notified.
293.330	Brock and Gemma Hamilton	Historic Heritage	General	Oppose	No specific reasons given	Retain as notified
293.331	Brock and Gemma Hamilton	SCHED2 – Historic Heritage Items 100-199	HH 131 Name (Original) Awamoko Rock Art Site Extent of setting and any excl	Support	[refer to original submission]	[refer to original submission]
293.332	Brock and Gemma Hamilton	SCHED5 – Schedule of Sites and Areas of Significance to Maori	ID ref Name Description and Values SASM016 Te Awamoko Te Awamako	Oppose	Support for SNF24 as it is well mapped to the cliff feature and avoids improved pasture. [refer to original submission for full reasons]	Retain as notified

294.1	Meridian Energy Limited	Description of the District	General	Oppose	Opposes in part the current "Description of the District" and considers that it should also recognise the nationally significant Waitaki Power Scheme alongside other district features.	Seeks to amend as follows: The District has traditionally ~~Traditionally~~ been ~~a rural~~ and farming district, and primary industries still predominate today. The District also includes the nationally significant Waitaki Power Scheme and a diverse ~~The~~ economy ~~has also diversified and includes~~ that benefits from ski fields, the wine industry, mining and outdoor pursuits including the Alps to Ocean cycle trail. Tourism is an important contributor to the District's economy with visitors attracted to the extensive Māori and Victorian heritage, wildlife, geological features, outdoor pursuits and award-wining restaurants on offer within the District. The District was recognised as a UNESCO Global Geopark in 2023.
294.2	Meridian Energy Limited	Definitions	Enhancement in relation to the Energy Chapter, Part B and Activities on the Surface of W	Oppose	Considers that the term 'development' should be used instead of 'enhancement', as it better reflects the terminology in the NPS-REG and provides greater clarity. The term enhancement is not used in the NPS-REG and the PDP definition of 'enhancement' describes development.	Seeks to delete the definition.
294.3	Meridian Energy Limited	Definitions	Maintenance means in relation to the Notable Trees chapter, gardening and lawn mowing in	Oppose	Considers that the definition aligns with the Mackenzie District Plan, but recommends amending the definition of 'maintenance' to apply consistently across relevant chapters and provisions, and deleting the separate 'maintenance and repair' definition to avoid confusion.	Seeks to amend as follows: In relation to infrastructure, the Energy Chapter (Parts A and B) ~~means in relation to the Energy Chapter, Part B~~ and Activities on the Surface of Water chapter, means undertaking work and activities, including erosion control works, necessary to keep ~~the~~ infrastructure and/or renewable electricity generation activities (including the Waitaki Power Scheme) operating and/or functioning ~~at an efficient~~ efficiently and ~~safe level~~ safely. Maintenance does not include upgrading. Also seeks to delete the definition of 'maintenance and repair'.
294.4	Meridian Energy Limited	Definitions	Maintenance and repair as it applies to infrastructure and renewable electricity generat	Oppose	Considers that repairs fall within the scope of maintenance and, given the proposed changes to the maintenance definition [refer to submission point 294.3] recommends deleting the separate 'maintenance and repair' definition, noting that 'repair' is not used in the NPS-REG, appears only once in the PDP and its distinction from 'maintenance' is unclear.	Seeks to delete the definition.
294.5	Meridian Energy Limited	Definitions	Refurbishment in relation to the Energy Chapter, Part B and Activities on the Surface of	Oppose	Considers the definition of "refurbishment" is replaced with an amended definition for "upgrade," as "refurbishment" is inconsistently applied in the PDP and is not used in the NPS-REG, and has caused confusion in other plans. Considers "upgrade" to be a preferred definition as activities that increase the capacity, efficiency, security, or safety of existing infrastructure and renewable electricity generation assets.	Seeks to delete the definition.
294.6	Meridian Energy Limited	Definitions	Renewable electricity generation has the same meaning as in the National Policy Statem	Support	Support for the definition as set out in the NPS-REG.	Retain as notified

294.7	Meridian Energy Limited	Definitions	Renewable electricity generation assets has the same meaning as in the National Policy S	Support	Supports the definition as set out in the NPS-REG.	Retain as notified
294.8	Meridian Energy Limited	Definitions	Upgrading means in relation to infrastructure, the improvement or increase in carrying c	Oppose	Considers that it is important to be explicit that the definition of upgrading or upgrade applies to the Waitaki Power Scheme and other renewable electricity generation activities.	Seeks to amend as follows: ~~means~~ in relation to infrastructure and renewable electricity generation activities (including the Waitaki Power Scheme), means activities undertaken to improve,~~the improvement~~ or increase ~~in carrying~~ the capacity, operational efficiency, security or safety of existing infrastructure, assets and activities. Upgrading does not include maintenance. ~~but excludes maintenance and repair.~~ Upgrade has the same meaning.
294.9	Meridian Energy Limited	Definitions	Waitaki Power Scheme means the structures, works, facilities, components, plant and acti	Support	Support for the definition and notes that it is generally consistent with the definition applied, through the Mackenzie District Plan, to that part of the Scheme that lies within the Mackenzie District.	Retain as notified
294.10	Meridian Energy Limited	Definitions	Waitaki Power Scheme Existing Footprint means those structures, works or components of t	Oppose	Considers that the definition does not encompass all parts of the potential footprint of renewable electricity generation activities at the Waitaki Power Scheme, nor does it accurately reflect the relationship between core sites, operating easements, and the existing footprint, which can extend beyond these areas.	Seeks delete the definition and replace as follows: Waitaki Power Scheme Footprint means the area of the structures, works, facilities, components, plant and activities undertaken to facilitate and enable the generation of hydroelectricity at the Waitaki Power Scheme.
294.11	Meridian Energy Limited	Definitions	Waitaki Power Scheme Operating Easements means land that the owner of the Waitaki Power	Support	Supports the definition	Retain as notified
294.12	Meridian Energy Limited	Strategic Direction	General	Oppose	Considers that the Strategic Direction chapter contains too many overlapping objectives, some of which are inconsistent with higher-level planning documents, and that many would be more appropriately placed in subsequent chapters.	Seeks that the SD objectives are rewritten to address the key direction setting matters for the Waitaki District Plan, remove duplication, and be made consistent with Part 2 of the Act and the relevant national policy statements.
294.13	Meridian Energy Limited	Strategic Direction	SD-CHI-O1 Character and Identity Waitaki's character, historic and cultural heritage, a	Oppose	Considers SD-CHI-O1, O2, and O3 are repetitive, inconsistent with Part 2 of the RMA and the NPS-REG, and unclear in their reference to protecting the district's character and identity, which could lead to the blanket exclusion of renewable electricity generation activities without proper consideration of their effects or national significance.	Seeks to amend as follows: Waitaki's ~~character,~~ historic ~~and cultural~~ heritage, ~~and identity~~ is ~~recognised~~ identified and protected ~~throughout the District~~ from inappropriate subdivision, use and development.
294.14	Meridian Energy Limited	Strategic Direction	SD-CHI-O2 Recognition, protection, and future opportunities for Waitaki's heritage Reco	Oppose	Considers SD-CHI-O1, O2, and O3 are repetitive, inconsistent with Part 2 of the RMA and the NPS-REG, and unclear in their reference to protecting the district's character and identity, which could lead to the blanket exclusion of renewable electricity	Seeks to delete the objective

					generation activities without proper consideration of their effects or national significance.	
294.15	Meridian Energy Limited	Strategic Direction	SD-CHI-O3 Waitaki's cultural heritage Wāhi tūpuna places, landscapes and features which	Oppose	Considers SD-CHI-O1, O2, and O3 are repetitive, inconsistent with Part 2 of the RMA and the NPS-REG, and unclear in their reference to protecting the district's character and identity, which could lead to the blanket exclusion of renewable electricity generation activities without proper consideration of their effects or national significance.	Seeks to amend as follows: Wāhi tūpuna places, landscapes and features ~~which~~ that are significant to mana whenua are identified, ~~recognised for their values~~ and where appropriate are managed or protected for future generations.
294.16	Meridian Energy Limited	Strategic Direction	SD-MW-O2 Mana whenua values, rights, and interests Protect and recognise mana whenua va	Oppose	Considers that SD-MW-O2 is inconsistent with Part 2 of the RMA and the NPS-REG. Considers protection of mana whenua values and interests would lead to the avoidance of any activity that detracted from such values and interests and this is not consistent with national policy direction.	Seeks to amend as follows: ~~Protect and recognise~~ Recognise and provide for the relationships of mana whenua with their culture, values, ~~rights~~, and interests, and protect their protected customary rights.
294.17	Meridian Energy Limited	Strategic Direction	SD-NE-O1 Natural character, landscapes and features and ecosystems Protection, restorat	Oppose	Considers that SD-NE-O1 is inconsistent with Part 2 of the RMA, the NPS-REG, and the NPS-IB. Considers that protection of "natural character, landscapes, features, ecosystems and water quality of the district" would lead to the avoidance of any activity that detracted from these features or values, and this is not consistent with national policy direction	Seeks to replace the objective as follows: SD-NE-O1 Natural character and outstanding natural features and landscapes The Waitaki District's natural character and outstanding natural features and landscapes are protected from inappropriate subdivision, use and development, and where appropriate are restored or enhanced. SD-NE-O1A Significant indigenous vegetation and significant habitats of indigenous fauna The Waitaki District's significant indigenous vegetation and significant habitats of indigenous fauna are maintained overall, and where appropriate are protected, restored or enhanced.
294.18	Meridian Energy Limited	Strategic Direction	SD-RRNH-O1 Natural hazards Improve the District's resilience to natural hazards, and wh	Oppose	Considers that 'avoid where possible' is unnecessarily restrictive and is not consistent with Part 2 of the Act and broader national policy direction and that focusing on improving resilience by managing significant risks is more appropriate.	Seeks to amend as follows: Improve the District's resilience to natural hazards, ~~and where possible, avoid or, where avoidance is not possible, mitigate~~ by managing the significant risks to people, communities, property, and infrastructure.
294.19	Meridian Energy Limited	Strategic Direction	SD-IEE-O1 Infrastructure The significant benefits and local, regional and national impo	Oppose	Considers that the benefits of infrastructure, including electricity generation facilities, should not be limited to only significant benefits, rather recognition of all benefits of regionally and nationally significant infrastructure is needed. Supports enabling the operation, maintenance, and upgrade of existing renewable electricity generation activities through permitted activity rules.	Seeks to amend as follows: The ~~significant benefits and~~ local, regional and national ~~importance~~ benefits of the use and development of regionally and nationally significant infrastructure are recognised, ~~and~~ enabled and provided for.
294.20	Meridian Energy Limited	Strategic Direction	SD-IEE-O2 National Grid and the Waitaki Power Scheme	Oppose	Considers that SD-IEE-O2 does not provide sufficient strategic direction to the rest of the plan and should be expanded to provide clear direction on how the national significance of renewable	Seeks to delete the objective and replace with the following:

			The national significance of the N		electricity generation and the National Grid must be recognised and provided for in the District. Such direction should include, avoiding reverse sensitivity effects, enabling the operation, maintenance and upgrade of the existing Waitaki Power Sheme and the National Grid, and providing for new renewable electricity generation activities.	National significance of renewable electricity generation activities and the National Grid The national significance of renewable electricity generation activities and the National Grid is recognised by: 1. enabling the operation, maintenance and upgrade of the Waitaki Power Scheme and the National Grid; and 2. providing for the development, operation, maintenance and upgrade of new renewable electricity generation activities; and 3. avoiding reverse sensitivity effects on renewable electricity generation activities and assets (including the Waitaki Power Scheme) and the National Grid.
294.21	Meridian Energy Limited	Strategic Direction	SD-IEE-O3 Energy Use our energy resources efficiently in how we live, work and move thr	Oppose	Considers the phrase "Use of our energy resources" unclear, as it could refer to either energy generation or community energy use, and recommends refocusing the objective on the efficient use of energy by the community.	Seeks to amend as follows: Energy efficiency ~~Use our energy~~ The district's end use of energy is efficient~~resources efficiently in how we live, work and move through the district.~~
294.22	Meridian Energy Limited	Strategic Direction	SD-IEE-O4 Renewable energy There is reduced reliance on non-renewable sources of energy	Oppose	Considers the reference to energy conservation unnecessarily overlaps with the efficient use of energy that is addressed in SD-IEE-O3.	Seeks to amend as follows: There is reduced reliance on non-renewable sources of energy and encouragement of increased use of renewable sources ~~and energy conservation.~~
294.23	Meridian Energy Limited	Strategic Direction	SD-RA-O2 Protecting highly productive land Protect highly productive land from inapprop	Oppose	Considers that protecting productive soils could result in avoiding any activity that affects soil productivity, which is inconsistent with the NPS-REG and the RMA, especially given the functional and operational needs of renewable electricity generation activities that may require rural locations.	Seeks to amend as follows: Protect highly productive land from inappropriate subdivision, use or development, ~~and recognise the need to protect productive soils for growing food.~~
294.24	Meridian Energy Limited	Energy	Part A of this chapter contains district-wide provisions relating to energy activities, specifically	Oppose	Considers that the first sentence of the chapter is not clear on whether Part A and Part B operate separately from each other, or whether the activities they address overlap with each other.	Seeks to delete the first sentence of the chapter and replace with the following: The Energy Chapter is structured in 2 parts. Part A addresses renewable electricity generation activities, but not the Waitaki Power Scheme's activities and assets. Part B addresses all of the Waitaki Power Scheme's activities and assets and no other renewable electricity generation activities.
294.25	Meridian Energy Limited	Energy	General	Oppose	Considers that the title and provisions in Part A of the Energy Chapter should be consistent and refer to 'renewable electricity generation activities', rather than also referring to 'renewable energy generation activities' as this aligns with the chapter's intent and defined terms in the PDP.	Seeks to amend as follows and make consequential amendments to all provision references in the Energy chapter: Part A:~~General Energy~~ Renewable Electricity Generation (~~ENG~~REG)
294.26	Meridian Energy Limited	Energy	Introduction	Oppose	Considers that the ENG chapter introduction is inconsistent with the NPS-REG, as it fails to recognise the national significance of renewable electricity generation and omits reference to offsetting and compensation as ways to address adverse effects. Also considers the introduction should clearly explain the relationship	Delete the introduction and replace with the following: Energy efficiency and the benefits to be derived from the use and development of renewable energy are matters the District Plan must have particular regard to under section 7 of the Act. The

					between Part A of the Energy Chapter and the rest of the plan, with Part A functioning as a standalone chapter for renewable electricity generation activities other than those associated with the Waitaki Power Scheme.	District Plan must also give effect to the National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG), which requires that the national significance of renewable electricity generation activities and the national, regional, and local benefits of such activities (such as increasing electricity capacity and security of supply while displacing greenhouse gas emissions) are recognised and provided for in district plans. The NPS-REG directs that the development, operation, maintenance and upgrading of both new and existing renewable electricity generation activities is provided for to increase the proportion of electricity generated from renewable energy sources, thereby displacing use of non-renewable energy sources and reducing carbon emissions. These activities often have a functional need or operational need to be in a particular location but also have the potential to adversely affect the environment. Part of the nationally significant Waitaki Power Scheme is located in the Waitaki District. Part A of the Energy Chapter (REG) addresses the development, operation, maintenance and upgrading of renewable electricity generation activities other than the Waitaki Power Scheme, while managing the potential adverse effects of such activities. Concerning the activities addressed by Part A of the Energy Chapter, the provisions in Table 1 also apply to such activities. Beyond the provisions listed in Table 1, no other provisions in this plan also apply to the activities addressed by Part A of the Energy Chapter, except where specified within the provisions of Part A. Table 1 Provisions that also apply to the activities addressed by Part A of the Energy Chapter Topic | Plan Provisions that Apply to Activities Managed in this Chapter Strategic Direction | SD-CHI-O1 Character and Identity(as amended by Meridian's submissions) SD-CHI-O3 Waitaki's cultural heritage(as amended by Meridian's submissions) SD-MW-O2 Mana whenua values, rights, and interests(as amended by

						<table><tr><td></td><td>Meridian's submissions) SD-NE-O1 Natural character, landscapes and features and ecosystems(as amended by Meridian's submissions) SD-IEE-O1 Infrastructure(as amended by Meridian's submissions) SD-IEE-O2 National Grid and the Waitaki Power Scheme(as amended by Meridian's submissions) SD-RA-O2 Protecting highly productive land(as amended by Meridian's submissions)</td></tr><tr><td>Activities on the Surface of Water</td><td>ASW-R4(as amended by Meridian's submissions)</td></tr><tr><td>Signs</td><td>SIGN-R1 SIGN-R4</td></tr></table>
294.27	Meridian Energy Limited	Energy	User Notes: For some activities, a resource consent may be required by rules in more than one ch	Oppose	Considers that the User Note does not clearly explain how Part A of the Energy Chapter relates to the rest of the plan, and considers that Part A should function as a standalone chapter focused on renewable electricity generation activities other than those associated with the Waitaki Power Scheme.	Seeks to delete the user note and rely on the relief sought in submission point 294.26.
294.28	Meridian Energy Limited	Energy	ENG-O1 Recognising the benefits of renewable electricity generation The significant local,	Oppose	Considers that the term "use and development" does not clearly reflect the nationally significant activities recognised in the NPS-REG, which include the development, operation, maintenance, and upgrade of renewable electricity generation, as well as recognising its benefits.	Seeks to amend as follows: ~~ENG-O1~~REG-O1 Recognising the benefits of renewable electricity generation The ~~significant~~ local, regional and national benefits from the ~~use and~~ development, operation, maintenance and upgrade of renewable ~~energy~~ electricity generation activities are recognised and these activities are enabled where appropriate or are otherwise ~~renewable electricity generation activities are~~ provided for.
294.29	Meridian Energy Limited	Energy	ENG-O2 Design and location of renewable electricity generation Renewable electricity ge	Oppose	Considers ENG-O3 to be duplicative of ENG-O2 and recommends merging the objectives, while also seeking the removal of the term "minimise" from ENG-O2, as the NPS-REG supports managing effects through avoidance, remediation, mitigation, offsetting, and compensation, and requires consideration of whether the benefits outweigh any residual effects. [also refer to submission point 294.30]	Seeks the following amendments: ~~ENG-O2~~REG-O2 Design and location of renewable electricity generation Renewable electricity generation activities are designed and located to ~~minimise~~ manage adverse effects on the environment while recognising ~~their~~ the functional needs and operational needs of these activities.
294.30	Meridian Energy Limited	Energy	ENG-O3 Protecting the values and qualities of any overlay Waitaki District's overlays a	Oppose	Considers ENG-O3 to be duplicative of ENG-O2 and recommends merging the objectives [refer to submission point 294.29]	Seeks to delete the objective [refer to submission point 294.29]

294.31	Meridian Energy Limited	Energy	ENG-P1 Recognising the benefits of renewable electricity generation Recognise the local, r	Oppose	Considers ENG-P1 to be unclear and inconsistent with the NPS-REG, as it refers to renewable energy and energy targets rather than renewable electricity generation and the national target for renewable electricity, and omits key elements such as maintaining or increasing generation capacity while reducing greenhouse gas emissions, which are central to the NPS-REG.	Seeks to amend as follows: ~~ENG-P1~~REG-P1 Recognising the benefits of renewable electricity generation activities Recognise the local, regional and national benefits of renewable ~~energy~~ electricity generation activities, including: 1.~~the~~ their contribution to ~~central government energy policy objectives and renewable energy targets~~ the New Zealand Government's national targets for renewable electricity generation; and 2.~~the~~ their contribution ~~the proposal will make~~ to maintaining or increasing electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions; 3.their contribution to maintaining or improving the local, regional and national ~~the~~ security of supply ~~and increased energy interdependence for the district and region~~; and 4.their ~~the~~ contribution to economic benefits for the regional and local economy; and 5. any other positive benefits.
294.32	Meridian Energy Limited	Energy	ENG-P2 Existing activities Enable the ongoing refurbishment, maintenance and repair, an	Oppose	Considers that the definition of "refurbishment" applies only to the Waitaki Power Scheme and lacks clarity when used in Part A of the Energy Chapter, and since "refurbishment" and "repair" are not terms used in the NPS-REG—unlike "upgrade"—Meridian seeks amendments to the definition of "upgrade" and corresponding changes to ENG-P2 to better align with national policy direction. [refer submission point 294.8]	Seeks to amend as follows: ~~ENG-P2~~REG-P2 Existing Renewable Electricity Generation Activities Enable the ongoing ~~refurbishment~~, operation, maintenance ~~and repair~~, and ~~operation~~ upgrade of existing renewable electricity generation activities.
294.33	Meridian Energy Limited	Energy	ENG-P3 Effects on renewable electricity generation activities Only allow new sensitive act	Oppose	Supports protecting renewable electricity generation activities from reverse sensitivity effects but considers that the current provision in ENG-P3 is unclear, as it addresses non-energy activities and may be overlooked by users. Considers that SD-IEE-O2 is amended or revising ENG-P3 to clearly reference the Waitaki Power Scheme.	Seeks to address reverse sensitivity effects on renewable electricity generation activities in SD-IEE-O2 [refer submission point 294.20]; or Seeks to amend ENG-P3 as follows: ~~ENG-P3~~REG-P3 Prevent reverse sensitivity effects ~~Effects~~ on renewable electricity generation activities Only allow new sensitive activities to establish in proximity to existing or consented renewable electricity generation activities (including the Waitaki Power Scheme) where they are designed and located to avoid ~~or mitigate~~ reverse sensitivity effects.
294.34	Meridian Energy Limited	Energy	ENG-P4 Small scale renewable electricity generation activities and investigation activities ou	Oppose	Considers that combining investigation and small-scale renewable electricity generation activities in ENG-P4 overlooks their differing effects. Also considers that the policy addresses effects on overlays where the title excludes these, uses unclear language about offsetting, and inappropriately uses the term "minimise," which is inconsistent with the NPS-REG's framework for managing effects and weighing them against the benefits of renewable electricity generation.	Seeks to amend as follows: ~~ENG-P4~~REG-P4 Small scale renewable electricity generation activities ~~and investigation activities outside of overlays~~ Enable small scale renewable electricity generation activities ~~and activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable~~

						~~electricity generation activities,~~ where: ~~a. it is of a form, location and scale that minimises adverse effects on the environment; and~~ ~~b.~~it is consistent with the anticipated amenity values and character of the zone and otherwise provide for such activities while managing the potential effects of the activity.; ~~and~~ ~~c. where it is demonstrated that all adverse effects on an overlay cannot be avoided, it appropriately offsets or compensates the adverse effects.~~ and Seeks to insert a new policy as follows: REG-P4A Investigation activities Enable investigation, identification and assessment of potential sites and energy sources for renewable electricity generation activities while managing adverse effects on the environment.
294.35	Meridian Energy Limited	Energy	ENG-P5 Small scale renewable electricity generation activities and investigation activities in	Oppose	Considers the policy's restrictive wording could lead to declining consent applications for investigation and small-scale renewable electricity generation activities without considering their benefits, which is inconsistent with the NPS-REG. Considers the proposed amendments to ENG-P4 adequately address these activities [refer submission point 294.34].	Seeks to delete ENG-P5, amend ENG-P4 and insert new policy REG-P4A [refer submission point 294.34]
294.36	Meridian Energy Limited	Energy	ENG-P6 Large scale renewable electricity generation activities Provide for large scale	Oppose	Considers the policy's restrictive wording prevents consideration of the benefits of large-scale renewable electricity generation activities when all listed criteria are not met, which is inconsistent with the NPS-REG's framework of enabling such activities while managing their effects through mitigation, offsetting, or compensation.	Seeks to delete the policy and replace as follows: REG-P5 Large scale renewable electricity generation activities outside of overlays Provide for large scale renewable electricity generation activities outside of overlays while managing the potential adverse effects on the environment.
294.37	Meridian Energy Limited	Energy	ENG-P7 Large scale renewable electricity generation activities in other zones and within overl	Oppose	Considers the policy's blanket restrictions on locating large-scale renewable electricity generation activities in zones other than the General Rural Zone and within overlays are unclear and inconsistent with the NPS-REG, which requires a more balanced approach to managing effects while recognising the national significance of such activities.	Seeks to delete the policy and replace as follows: REG-P6 Large scale renewable electricity generation activities in overlays Provide for renewable electricity generation activities in overlays, where there is a functional need or operational need for the activity to be in that location, while managing the potential adverse effects on the environment.
294.38	Meridian Energy Limited	Energy	ENG-P8 New technology Recognise the opportunity for new technology in renewable electri	Oppose	Considers the policy duplicates the management of effects already addressed in ENG-P6 and ENG-P7, includes unclear and inconsistent requirements, such as avoiding all adverse effects on overlay values and misusing the term "reverse sensitivity". Considers that this does not align with the NPS-REG framework for	Seeks to delete the policy.

					managing effects and considering the benefits of renewable electricity generation activities.	
294.39	Meridian Energy Limited	Energy	ENG-P9 Decommissioning of renewable electricity generation activities Require that, during	Oppose	Considers the term "remediated" unclear and notes that full removal of all surface equipment and materials may not always be appropriate when decommissioning renewable electricity generation activities, and questions why such decommissioning is addressed in the PDP when it is not for other infrastructure, with no explanation provided in the section 32 Report.	Seeks to delete the policy.
294.40	Meridian Energy Limited	Energy	ENG-R1 The operation, maintenance, and refurbishment of existing renewable electricity generat	Oppose	Considers that in all zones and locations, the operation and maintenance of existing renewable electricity generation activities should be enabled, and upgrades within the existing footprint of a renewable electricity generation activity should also be enabled. This recognises that the existing environment of the activity will already be modified, and that safety requirements must be met, and recognises the national significance of renewable electricity generation activities under the NPS-REG.[refer also to submission point 294.41]	Seeks to amend as follows: ~~ENG-R1~~ REG-R1 The operation and, maintenance, ~~and refurbishment~~ of existing renewable electricity generation activities ~~outside of Significant Natural Areas~~ All zones Activity status: Permitted Seeks to add the following new rule: REG-R1A The upgrade of existing renewable electricity generation activities within the existing footprint of the renewable electricity generation activity All zones Activity status: Permitted
294.41	Meridian Energy Limited	Energy	ENG-R2 The operation, maintenance, and refurbishment of existing renewable electricity generat	Oppose	Considers that ENG-R1 should address the operation and maintenance of existing renewable electricity generation activities and the upgrade of such activities within the the existing footprint of the activity and that ENG-R2 should be limited to addressing upgrades of existing renewable electricity generation activities that are outside the existing footprint of the renewable electricity generation activity. [refer also to submission point 294.40]	Seeks to amend as follows: ~~ENG-R2~~ REG-R2 The ~~operation, maintenance, and refurbishment~~ upgrade of existing renewable electricity generation activities outside the existing footprint of the renewable electricity generation ~~activity within Significant Natural Areas~~ All zones Activity status: Permitted Where: PER-1 The activity is outside a Significant Natural Area; or PER-2 The activity is inside a Significant Natural Area and the ~~The~~ standard ENG-S6 Trimming, pruning or removal of indigenous vegetation for the operation of renewable electricity generation activities is complied with. Activity status when compliance is not achieved: Controlled Where:

						CON-1 Compliance is not achieved with PER-~~1~~2 Matters of control are restricted to: 1. the matters of discretion listed in ENG-S6. [refer also to submission point 294.40]
294.42	Meridian Energy Limited	Energy	ENG-R3 Small scale renewable electricity generation activities outside of an overlay Al	Support	Support for the rule - allows small-scale renewable electricity generation activities outside overlays as a permitted activity when certain conditions are met, and if not, the activity becomes restricted discretionary with limited matters of discretion.	Retain as notified while renumbering it as follows: ~~ENG-R3~~REG-R3
294.43	Meridian Energy Limited	Energy	ENG-R4 Investigation activities outside of an overlay All zones Activity status: Perm	Support	Support - permits investigation activities outside overlays when certain conditions around earthworks, mast height, and noise are met, and if not, the activity becomes restricted discretionary with limited matters of discretion.	Retain as notified while renumbering it as follows: ~~ENG-R4~~REG-R4
294.44	Meridian Energy Limited	Energy	ENG-R5 Small scale renewable electricity generation activities and investigation activities in	Oppose	Considers that the non-complying activity status (that is applied when identified standards are not met) is unnecessarily restrictive and inconsistent with the NPS-REG, and instead seeks a discretionary activity status to allow proper consideration of the activity's benefits relative to any residual effects	Seeks to amend as follows: ~~ENG-R5~~REG-R5 ... ~~Non-Complying~~ Discretionary Where: ~~NC~~ DISC-1 Compliance is not achieved with RDIS-2 and/or RDIS-4
294.45	Meridian Energy Limited	Energy	ENG-R6 Small scale renewable electricity generation activities and investigation activities wi	Oppose	Considers that the non-complying activity status (that is applied when identified standards are not met) is unnecessarily restrictive and inconsistent with the NPS REG and seeks a discretionary activity status instead to allow proper consideration of the activity's benefits against any residual effects	Seeks to amend as follows: ~~ENG-R6~~REG-R6 ... Activity status when compliance is not achieved: Discretionary Where: DIS-1 Compliance is not achieved with RDIS 1 and RDIS-2 ~~Activity status when compliance is not achieved:~~ ~~Non-Complying~~ ~~Where:~~ ~~NC-1~~ ~~Compliance is not achieved with RDIS-1~~
294.46	Meridian Energy Limited	Energy	ENG-R7 Large scale renewable electricity generation activities General Rural Zone Act	Oppose	Considers the discretionary and non-complying activity statuses applied to large-scale renewable electricity generation activities to be unnecessarily restrictive and inconsistent with the NPS-REG, and instead seeks restricted discretionary status outside overlays	Seeks to delete the rule [refer also to submission point 294.47]

					and discretionary status within overlays, supported by a catch-all rule as outlined in Meridian's submission on ENG-R8, to allow proper consideration of the benefits relative to residual effects.[refer also to submission point 294.47]	
294.47	Meridian Energy Limited	Energy	ENG-R8 Other renewable electricity generation activities not otherwise provided for All	Oppose	Considers the discretionary and non-complying activity statuses applied to "Other renewable electricity generation activities not otherwise provided for" to be unnecessarily restrictive and inconsistent with the NPS-REG, and recommends applying the same rule structure and activity status as for large-scale renewable electricity generation—restricted discretionary outside overlays and discretionary within overlays—to ensure the benefits of such activities can be properly considered against any residual effects.	Seeks to amend as follows: ~~ENG-R8~~REG-R7 ~~Other~~ Any renewable electricity generation activities not otherwise ~~provided for~~ listed All zones Activity status: Restricted Discretionary Where: ~~DIS-1~~RDIS-1 The activity is ~~not~~ located ~~within~~ outside an overlay. Matters of discretion are restricted to: a) The appropriateness of measures to avoid, remedy or mitigate adverse effects. b) The effectiveness of any proposed offsetting or compensation measures to manage any significant residual adverse effects that cannot be avoided, remedied or mitigated. c) The functional needs and operational needs of the activity and the need to locate the renewable electricity generation activity where the renewable energy resource is available. d) The location of existing electricity generation, transmission and distribution infrastructure and the extent to which the proposal contributes to its efficient use. e) The significance and benefits of the proposal. f) The nature of any adverse effects on the environment from construction of any building or structure including earthworks, dust, run-off, sedimentation, noise and traffic. g) The location, bulk, height, cladding or colour of the proposed work. h) The extent of landscaping, revegetation, and fencing. i) The extent and location of earthworks. j) The location and construction of vehicle entry and exit points. k) Vehicle manoeuvring and parking areas. Activity status when compliance is not achieved with RDIS-1:~~Non-Complying~~Discretionary ~~Where:~~ ~~NC-1~~ ~~Compliance is not achieved with DIS-1~~
294.48	Meridian Energy Limited	Energy	General	Oppose	Considers that the title of Part A of the Energy Chapter should reflect the focus of the chapter on renewable electricity generation activities, while being clear that Part B addresses the assets and activities of the Waitaki Power Scheme.	Seeks to amend the title as follows and make all consequential amendments to the referencing of provisions: Part B: Waitaki Power Scheme (~~ENG~~REG(WPS))

294.49	Meridian Energy Limited	Energy	Part B of the Energy chapter addresses those parts of the nationally significant Waitaki Power Schem	Oppose	Considers that the introduction to Part B should clearly state that it addresses the operation, maintenance, and upgrade of the Waitaki Power Scheme, that other chapters of the District Plan do not apply to the Scheme, and that references to inundation risks and reverse sensitivity effects should be addressed elsewhere in the plan. Considers the use of the term “significant infrastructure” in this context is misleading given its defined use applies outside of the Energy Chapter.	Seeks to amend as follows: Part B of the Energy ~~chapter~~ Chapter addresses ~~those parts~~ the operation, maintenance and upgrade of the nationally significant Waitaki Power Scheme ~~that are~~ where it is located in the Waitaki district., ~~including ongoing operation of the Waitaki Power Scheme activities, the different activities that occur on site and provides a framework for how any new development may occur.~~ ~~The provisions in Part B apply to the Waitaki Power Scheme Core Sites Waitaki Power Scheme Operating Easements or the Hydroelectricity Inundation Hazard Areas overlays and underlying zones.~~ The Waitaki Power Scheme is currently the largest hydro-electric power scheme in New Zealand, ~~and is significant infrastructure,~~ with local, regional and national benefits. The Waitaki Power Scheme was progressively constructed between 1928 and 1985 and consists of eight power stations, four canal systems and numerous dams, weirs, gates and other control structures that operate as a linked hydroelectricity generation chain. The chain includes large, modified storage lakes, a series of diversions via canals, and a cascade of in- river dams. The power stations and associated structures and assets, including storage lakes and canals, represent a significant physical resource within the Waitaki District. The Waitaki Power Station was the first to be constructed in the Waitaki district. The Scheme commences at Lake Tekapō in the Mackenzie District, and from Lake Ōhau to Lake Waitaki, the Scheme lies within the Waitaki ~~district~~ District. The Scheme contributes an average of 18% of New Zealand’s annual electricity supply and at times as much as 30% of the national requirement. The Scheme supports the HVDC link, which is connected to the South Island transmission network at the site of the Benmore Power Station. The national significance of the Waitaki Power Scheme is established in the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Freshwater Management 2020. Due to ~~its~~ the significance ~~and importance~~ of the Waitaki Power Scheme to the country as a whole, ~~this part of the chapter also addresses~~ the potential reverse sensitivity effects on the Waitaki Power Scheme that could constrain its ongoing operation must be avoided, as set out in the Strategic Direction Objectives and other parts of this plan.

<table>
<tr><td></td><td></td><td></td><td></td><td></td><td></td><td>~~Andthe~~ The potential risks associated with an inundation event from the Waitaki Power Scheme are addressed in the Hazards and Risks Chapter of this plan.

The provisions in Part A of the Energy Chapter and all other chapters of this District Plan, other than Part B: Waitaki Power Scheme (REG(WPS)), do not apply to the Waitaki Power Scheme except where specifically identified in Part B of the Energy Chapter or where listed in Table 2.

Table 2 Provisions that also apply to the activities addressed by Part B of the Energy Chapter

<table><tr><td>Topic</td><td>Plan Provisions that Apply to Activities Managed in this Chapter</td></tr><tr><td>Strategic Direction</td><td>SD-CHI-O3 Waitaki's cultural heritage(as amended by Meridian's submissions)
SD-MW-O2 Mana whenua values, rights, and interests(as amended by Meridian's submissions)
SD-IEE-O1 Infrastructure(as amended by Meridian's submissions)
SD-IEE-O2 National Grid and the Waitaki Power Scheme(as amended by Meridian's submissions)</td></tr><tr><td>Activities on the Surface of Water</td><td>ASW-R4(as amended by Meridian's submissions)</td></tr><tr><td>Signs</td><td>SIGN-R1
SIGN-R4</td></tr></table></td></tr>
<tr><td>294.50</td><td>Meridian Energy Limited</td><td>Energy</td><td>ENG(WPS)-O1 Recognising the significance and benefits of the Waitaki Power Scheme The loca</td><td>Oppose</td><td>Considers the objective is inconsistent with the NPS-REG, as it should enable the operation, maintenance, and upgrade of the Waitaki Power Scheme while managing potential effects through the NPS-REG framework, which includes avoiding, remedying, mitigating, offsetting, and compensating for residual effects, noting that "minimise" is not an appropriate term under this framework. Suggests amending clause (4) if changes to SD-IEE-O2 [refer to submission point 294.20] are not accepted,</td><td>Seeks to amend as follows:

~~ENG~~REG(WPS)-O1

Recognising the national significance and benefits of the Waitaki Power Scheme The local, regional and national significance and benefits of the Waitaki Power Scheme are recognised by:, ~~and its~~
1.enabling the operation, and maintenance of the Scheme, ~~refurbishment and enhancement;~~
2. enabling the upgrade of the Scheme where adverse effects are appropriately managed;, ~~are recognised~~ and ~~provided for and~~
3. providing for the development of new hydroelectricity generation activities associated with the Waitaki Power Scheme; and
4.~~protected~~protecting the Scheme rom reverse sensitivity effects ~~while minimising any adverse effects on the environment.~~</td></tr>
</table>

294.51	Meridian Energy Limited	Energy	ENG(WPS)-O2 Protecting the overlays in which the Waitaki Power Scheme is located The id	Oppose	Considers that the phrase “are protected and not degraded” in ENG(WPS)-O2 is overly broad and could unnecessarily constrain the operation, maintenance, and upgrade of the Waitaki Power Scheme. Considers that national direction under the RMA and relevant policy statements requires assessing the significance of the values being considered for protection and whether the national significance of renewable electricity generation outweighs any residual adverse effects. Considers that the list of overlays in ENG(WPS)-O2 should match the terminology used in the “Relationship between spatial layers” section of the plan.	Seeks to amend as follows: ~~ENG~~REG(WPS)-O2 ~~Protecting~~ Managing potential effects on identified values in the overlays in which the Waitaki Power Scheme is located The potential effects of upgrades to the Waitaki Power Scheme or the development of new hydroelectricity generation activities associated with the Waitaki Power Scheme on the identified ~~characteristics and~~ values of ~~the~~ areas ~~containing~~ identified as Outstanding Natural Landscapes, ~~and~~ Outstanding Natural Features, Significant Natural Feature ~~Areas~~, Sites and Areas of Significance to Māori, Historic Heritage Items, ~~Significant Natural Features~~ and Rural Scenic Landscape overlays, ~~in which the Waitaki Power Scheme is located, are protected and not degraded~~, are avoided, remedied or mitigated, and when considering any residual environmental effects that cannot be avoided, remedied or mitigated, regard is had to proposed offsetting measures or environmental compensation while recognising the national significance of renewable electricity generation activities. ~~having regard to any offsetting measures or environmental compensation which may benefit the local environment and community affected.~~
294.52	Meridian Energy Limited	Energy	ENG(WPS)-O3 Inundation risks The risks associated with a potential inundation event from t	Oppose	Considers that provisions relating to activities other than renewable electricity generation within the Waitaki Power Scheme Hydroelectricity Inundation Hazard areas are inappropriately located in the Energy Chapter, and recommends relocating them to a new subchapter in the Hazards and Risks Chapter, while also seeking clarification and amendment to ENG(WPS)-O3, as the phrase “as far as practicable” is inconsistent with the NPS-REG’s approach to managing reverse sensitivity effects.	Seeks to delete ENG(WPS)-O3 and insert new HI-O1 into a new Hydroelectricity Inundation Hazard sub-chapter in the Hazards and Risks chapter: HI-O1 Waitaki Power Scheme Hydroelectricity Inundation Hazard Development in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Area minimises risks to human health and property from hydroelectricity inundation and avoids reverse sensitivity effects on the Waitaki Power Scheme.
294.53	Meridian Energy Limited	Energy	ENG(WPS)-P1 Recognising the importance and benefits of the Waitaki Power Scheme Recognise	Oppose	Considers the policy should reflect the national significance of the Waitaki Power Scheme as recognised in the NPS-REG, NPS-FM, and NPS-IB, and that this significance requires protecting the Scheme’s structural and operational integrity and avoiding reverse sensitivity effects. Suggests that if changes to SD-IEE-O2 are not accepted [refer to submission point 294.20], clause (5) should be added to ENG(WPS)-P1.	Seeks to amend as follows: ~~ENG~~REG(WPS)-P1 Recognising the ~~importance~~ national and local significance and benefits of the Waitaki Power Scheme Recognise the ~~importance of the~~ national and local significance and benefits of the Waitaki Power Scheme ~~and its local, regional and national benefits~~, including by recognising: 1. the need to provide for the operational needs, and functional needs of the Scheme, and

						the locational and technical ~~requirements~~ practicalities of the Scheme; and 2. the need to maintain and increase generation output and capacity and ensure security of supply; and ~~3. the need for maximum electricity supply benefit to be obtained; and~~ 3.~~4.~~the need to ~~ensure that~~ protect the structural and operational integrity of the Scheme ~~is not compromised~~; and 4.~~5.it's~~the Scheme's role in meeting national targets for renewable electricity generation; and 5.~~6.it's~~the Scheme's role in assisting New Zealand's response to international climate change obligations; and 6. the need to manage activities to avoid reverse sensitivity effects on the Scheme.
294.54	Meridian Energy Limited	Energy	ENG(WPS)-P2 Identifying areas potentially affected by inundation events Identify and ma	Oppose	General support for the policy but recommends relocating it to a new Hydroelectricity Inundation Hazard sub-chapter in the Hazards and Risks section of the PDP, as it addresses non-energy activities related to hydroelectricity inundation hazards, which users are more likely to look for in that chapter. Also considers that minor clarity amendments should be made to the policy.	Seeks to amend ENG(WPS)-P2 as set out below, and move ENG(WPS)-P2 to become new HI-P1 in a new Hydroelectricity Inundation Hazard subchapter in the Hazards and Risks chapter: ~~ENG(WPS)-P2~~ HI-P1 Identify~~ing~~ areas potentially affected by hydroelectricity inundation Identify and map areas that may be potentially affected by ~~an~~ a hydroelectricity inundation event from the Waitaki Power Scheme as the Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas on the Planning Maps.
294.55	Meridian Energy Limited	Energy	ENG(WPS)-P3 Maintenance and improvement of the Waitaki Power Scheme Enable the maintena	Oppose	Considers that ENG(WPS)-P3 and other Part B policies do not adequately enable the operation of the Waitaki Power Scheme, and seeks a rewrite to reflect the NPS-REG by supporting its operation, maintenance, and upgrade, using consistent overlay terminology and replacing references to "improvement" and "refurbishment" with "upgrade."	Seeks to delete ENG(WPS)-P3 in its entirety and replace with the following: REG(WPS)-P2 Operation, maintenance and upgrade of the Waitaki Power Scheme 1. Enable the operation and maintenance of the Waitaki Power Scheme within the Scheme's existing footprint, core sites and operating easements; 2. Enable the upgrade of the Waitaki Power Scheme within the Scheme's existing footprint and core sites; 3. Provide for the upgrade of the Waitaki Power Scheme within the Scheme's operating easement while managing the potential

						adverse effects on identified values of the areas identified as Outstanding Natural Landscapes, Outstanding Natural Features, Significant Natural Features, Sites and Areas of Significance to Māori, Historic Heritage Item and Rural Scenic Landscape overlays.
294.56	Meridian Energy Limited	Energy	ENG(WPS)-P4 Enhancement of the Waitaki Power Scheme Enable the enhancement of the Wait	Oppose	Considers that the term “enhancement” should be replaced with “development” in the PDP, as “enhancement” is not used in the NPS-REG and its current definition aligns more closely with development and considers this terminology is clearer and more consistent with national policy.	Seeks to delete ENG(WPS)-P4 in its entirety and replace with the policy sought in the submitters relief to ENG(WPS)-P5 [refer to submission point 294.57].
294.57	Meridian Energy Limited	Energy	ENG(WPS)-P5 Any other development of the Waitaki Power Scheme Only allow for: the enha	Oppose	Considers the chapeau of ENG(WPS)-P5 inconsistent with the NPS-REG, as its restrictive wording could prevent consent applications from being considered on their merits, rather than allowing assessment of the activity’s benefits relative to any residual adverse effects.	Seeks to delete ENG(WPS)-P5 and replace it with the following: REG(WPS)-P5 New hydroelectricity generation activities associated with the Waitaki Power Scheme Provide for new hydroelectricity generation activities associated with the Waitaki Power Scheme where: a. adverse effects associated with changes in water levels in lakes, rivers and water storage areas are appropriately managed; and b. regard is had to the practical constraints associated with renewable electricity generation activities, including the; i. location and efficient use of existing electricity generation, transmission and distribution infrastructure; and ii. the need to locate the renewable electricity generation activity where the renewable energy resource is located.
294.58	Meridian Energy Limited	Energy	ENG(WPS)-P6 Occupied buildings in Hydroelectricity Inundation Hazard Areas Within the W	Oppose	Considers that provisions for non-energy activities in hydroelectricity inundation hazard areas are inappropriately located in the Energy Chapter and should be moved to a new subchapter 'Hydroelectricity Inundation Hazards' in the Hazards and Risks section. Also considers the policy should apply more broadly to land use changes that may increase inundation risk or reverse sensitivity effects, and that the term "acceptable risk" needs clarification and recommends that reverse sensitivity protection extend to all renewable electricity generation activities within the Waitaki Power Scheme, not just its operation.	Seeks to amend the policy as set out below, and move to become new HI-P2 in a new Hydroelectricity Inundation subchapter in the Hazards and Risks section: HI-P2 Development in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas Within the Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas: 1. avoid the establishment of occupied buildings ~~within the identified Waitaki Power Scheme Hydroelectricity Inundation High Hazard Area~~; and 2.avoid changes to existing land use activities that may increase the likelihood or scale of harm to people or property from

						hydroelectricity inundation, or the potential for reverse sensitivity effects on the Waitaki Power Scheme. ~~only allow occupied buildings within the Waitaki Power Scheme Hydroelectricity Inundation Hazard Areawhere it can be demonstrated that:~~ ~~a. the building and associated activity incorporates mitigation measures that demonstrate that the risk to lives and wellbeing and building damage from an uncontrolled release of water from the Waitaki Power Scheme is acceptable; and~~ ~~b. the ongoing operation of the Waitaki Power Scheme will not be compromised.~~
294.59	Meridian Energy Limited	Energy	ENG(WPS)-P7 Reverse sensitivity Reverse sensitivity effects on the Waitaki Power Scheme ar	Oppose	Considers the policy to be inconsistent with the NPS-REG, as it does not adequately reflect the need to avoid reverse sensitivity effects on the nationally significant Waitaki Power Scheme, and recommends relocating the policy to SD-IEE-O2, where users are more likely to find provisions relevant to non-energy activities.	Seeks to delete the policy and amend SD-IEE-O2 {refer submission point 294.20]. If ENG(WPS)-P7 is not deleted and in combination the corresponding amendment to SD-IEE-O2 is not made, seeks to amend ENG(WPS)-P7 as follows: ~~ENG~~REG(WPS)-P7 Reverse Sensitivity Reverse sensitivity effects on the Waitaki Power Scheme are avoided, ~~remedied or mitigated.~~
294.60	Meridian Energy Limited	Energy	ENG(WPS)-R1 Operation, maintenance and refurbishment of the Waitaki Power Scheme Genera	Oppose	Supports permitting the operation and maintenance of the Waitaki Power Scheme under ENG(WPS)-R1 but considers the term "refurbishment" problematic and prefers the term "upgrade". Also questions the need for conditions related to Notable Trees, given none are identified in the PDP associated with the WPS and existing standards are overly restrictive. Recommends a rule framework that enables upgrades within the Scheme's existing footprint, core sites, and operating easement where noise, earthworks and indigenous vegetation clearance requirements are met.	Seeks to delete ENG(WPS)-R1 and replace with the following three rules: REG(WPS)-R1 Operation and maintenance of the Waitaki Power Scheme General Rural Zone, Open Space Zone Activity Status: PER REG(WPS)-R2 Upgrade of the Waitaki Power Scheme within the Scheme's existing footprint or core sites General Rural Zone, Open Space Zone Activity Status: PER

						REG(WPS)-R3 Upgrade of the Waitaki Power Scheme within the Scheme's operating easement General Rural Zone, Open Space Zone Activity Status: PER Where: PER-1 The standard REG(WPS)-S1 Construction Noise is complied with; and PER-2 Where the activity is located in a natural hazard overlay all of the following standards are complied with where relevant: 1. EW-S5 Infrastructure earthworks – slope, height, depth; 2. EW-S6 Infrastructure earthworks – area in a 12-month period per site, excluding the road reserve and rail corridor; and PER-3 The standard EW-S7 Infrastructure earthworks in relation to Historic Heritage and Sites and Areas of Significance to Māori is complied with where the activity is located on a Heritage Item, or within the setting of a Heritage Item identified inSCHED2 – Historic Heritage Items or within an area identified in SCHED5 – Sites and Areas of Significance to Māori; and PER-4 The standard EW-S8 Infrastructure earthworks –in relation to Outstanding Natural Features and Landscapes, Significant Natural Features and Rural Scenic Landscape Overlays is complied with where the activity is located within an area identified in SCHED7 – Outstanding Natural Features, SCHED8 –

						Outstanding Natural Landscapes or SCHED9 – Significant Natural Features; and PER-5 The standard INF-S14 Trimming, pruning or removal of indigenous vegetation and earthworks within an area identified in SCHED6 – Significant Natural Areas is complied with where the activity is located within an area identified in SCHED6 –Significant Natural Areas. Activity status when compliance is not achieved: Restricted Discretionary Matters of discretion are restricted to: Where PER-1 is not complied with, the matters listed in REG(WPS)-S1 Construction Noise Where PER-2 is not complied with, the matters listed in EW-S5 and ES-S6 Where PER-3 is not complied with, the matters listed in EW-S7 Where PER-4 is not complied with, the matters listed in EW-S8 Where PER-5 is not complied with, the matters listed in INF-S14
294.61	Meridian Energy Limited	Energy	ENG(WPS)-R2 Occupied buildings in Waitaki Power Scheme Hydroelectricity Inundation Hazard Area	Oppose	Considers provisions for non-energy activities in hydroelectricity inundation hazard areas are incorrectly placed in the Energy Chapter and should be moved to a new "Hydroelectricity Inundation Hazard" sub-chapter within the Hazards and Risks section. Recommends setting a minimum 300mm clearance above the maximum inundation level for habitable floors in PER-1 and seeks greater clarity in PER-2.	Seeks to amend the rule as set out below, and move ENG(WPS)-R2 to become new HI-R1 in a new Hydroelectricity Inundation subchapter in the Hazards and Risks section: HI-R1 Occupied Buildings in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Area All zones Activity status: Permitted Where: PER-1 The occupied building is: 1. located at least 150m from the toe of the embankment of any canal, in fill or any dam or associated structure; and 2. designed so that any habitable floor area of any residential building ~~room of any building or structure used for residential~~

						~~activities~~ is a minimum of ~~100mm~~ 300mm above the maximum inundation level that would result from a dam or canal breach; and PER-2 A certificate is submitted from a suitably qualified engineer confirming that the building will not raise or change the Potential Impact Classification (PIC) level (Low, Medium, High) under the Building Act 2004 ~~from its current level~~, or where the Potential Impact Classification is already Medium or High, will not increase the Population at Risk in a manner that would lead to a requirement to cease to operate, or to a requirement to upgrade, modify, or replace the hydroelectricity related structures or to significantly alter the operation of an affected portion of a hydroelectricity scheme; ...
294.62	Meridian Energy Limited	Energy	ENG(WPS)-R3 Waitaki Power Scheme enhancement activity All zones Activity status: Cont	Oppose	Considers the use of "enhancement" in ENG(WPS)-R3 inconsistent with the NPS-REG and recommends replacing it with "development," which is clearer and better aligned with national policy. Also considers that a controlled activity status for new hydroelectricity generation within the Scheme's existing footprint or core sites (excluding changes to lake levels or new storage areas) is more appropriate provided the development does not result in an increase in the maximum operating level of a lake or water storage area authorised at the date the rule was notified, or create a new lake or water storage area. Considers that the development of new hydro electricity generation activities located outside of the existing footprint or core sites of the Scheme would not be considered to be 'associated with the Scheme' and should therefore be managed under Part A of the Energy Chapter.	Seeks to delete the rule and replace with the following: REG(WPS)-R4 Development of new hydro electricity generation activities associated with the Waitaki Power Scheme that are located in the existing footprint or core sites of the Waitaki Power Scheme All zones Activity Status: Controlled Where: 1. The development will not result in an increase in the maximum operating level of a lake or water storage area authorised at the date this rule was notified, or create a new lake or water storage area. Matters over which control is reserved: a) The nature of any visual effects of the building or the structure on the skyline and open landscape; b) The nature of any adverse effects on the environment from construction of structures, including from associated earthworks, dust, runoff, noise and traffic; c) The location, bulk, height, cladding or colour of the proposed work; d) The landscaping, revegetation and fencing; e) The nature and scale of earthworks: f) The location and construction of vehicle entry and exit points; g) Vehicle manoeuvring and parking areas; h) Where the activity is located in a Site or Area of Significance to

						Māori (SASM), the nature and scale of adverse effects on the values identified by the relevant rūnaka for the SASM, the appropriateness and adequacy of any mitigation measures proposed, and the functional need or operational need for the location of the activity. Activity status when compliance is not achieved with CON.1: Restricted Discretionary Matters of discretion are restricted to: a) The matters of control a) to h); b) The extent to which surrounding land would be inundated; c) The productive quality of soils of an area to be inundated; d) The degree to which the visual quality of the landscape will be affected; e) The social and economic impact on local communities; f) The extent to which an increased water body will affect the provision of roading and services within the locality g) The potential for increased recreational opportunities; h) The degree to which Outstanding Natural Landscapes, listed Historic Heritage Items, and significant vegetation and significant habitats of indigenous fauna will be affected; i) The extent of effects on Sites and Areas of Significance to Māori; and j) The extent to which the activity exacerbates lakeshore erosion and/or weakening of hillslopes.
294.63	Meridian Energy Limited	Energy	ENG(WPS)-R4 Any Waitaki Power Scheme land use activity which results in the creation of a new	Oppose	Opposes ENG(WPS)-R4 for the same reasons outlined in its submission on ENG(WPS)-R3 [refer to submission point 294.62] and that assigning discretionary status to new lake or water storage area creation is unnecessarily restrictive and inconsistent with the NPS-REG.	Seeks to delete the rule and replace with REG(WPS)-R4 as set out in submission point 294.62
294.64	Meridian Energy Limited	Energy	ENG(WPS)-R5 The construction and installation of new power generation facilities below the Wai	Oppose	Considers the rule is unclear and duplicative of provisions in Part A and would be addressed in the relief sought under submission point 294.62 for new rule REG(WPS)-R4.	Seeks to delete ENG(WPS)-R5 and replace with REG(WPS)-R4 as set out in submission point 294.62
294.65	Meridian Energy Limited	Energy	ENG(WPS)-R6 Any other activity, not otherwise provided for, associated with the Waitaki Power	Oppose	Considers the rule duplicates provisions in Part A and would be addressed in the relief sought under submission point 294.62 for new rule REG(WPS)-R4.	Seeks to delete the rule.
294.66	Meridian Energy Limited	Energy	ENG(WPS)-S1 Construction Noise Any construction activities must not exceed the noise le	Support	General support for the standard.	Retain as notified with renumbering as follows: ~~ENG~~ REG(WPS)-S1
294.67	Meridian Energy Limited	General	General	Amend	Considers that all provisions for non-energy activities in hydroelectricity inundation hazard areas should be relocated from the Energy Chapter to a new sub-chapter titled 'Hydroelectricity	Seeks to add a new subchapter titled “Hydroelectricity Inundation Hazard” in the Hazards and Risks section and move all provisions

					Inundation Hazard' within the Hazards and Risks section, as users are more likely to look there for property-related risk provisions.	that relate to the management of risks from potential hydroelectricity inundation to this new subchapter.
294.68	Meridian Energy Limited	General	General	Amend	Considers that all provisions for non-energy activities in hydroelectricity inundation hazard areas should be relocated from the Energy Chapter to a new sub-chapter titled 'Hydroelectricity Inundation Hazard' within the Hazards and Risks section, as users are more likely to look there for property-related risk provisions.	Seeks to insert new HI-O1 into a new Hydroelectricity Inundation Hazard subchapter in the Hazards and Risks section: HI-O1 Waitaki Power Scheme Hydroelectricity Inundation Hazard Development in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Area minimises risks to human health and property from hydroelectricity inundation and avoids reverse sensitivity effects on the Waitaki Power Scheme.
294.69	Meridian Energy Limited	General	General	Support	Considers that all provisions for non-energy activities in hydroelectricity inundation hazard areas should be relocated from the Energy Chapter to a new sub-chapter titled 'Hydroelectricity Inundation Hazard' within the Hazards and Risks section, as users are more likely to look there for property-related risk provisions.	Seeks to insert new HI-P1 into a new Hydroelectricity Inundation Hazard subchapter in the Hazards and Risks section: HI-P1 Identify areas potentially affected by hydroelectricity inundation Identify and map areas that may be potentially affected by a hydroelectricity inundation event from the Waitaki Power Scheme as the Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas on the Planning Maps.
294.70	Meridian Energy Limited	General	General	Support	Considers that all provisions for non-energy activities in hydroelectricity inundation hazard areas should be relocated from the Energy Chapter to a new sub-chapter titled 'Hydroelectricity Inundation Hazard' within the Hazards and Risks section, as users are more likely to look there for property-related risk provisions. Also considers the policy should apply broadly to land use changes that could increase inundation risk or reverse sensitivity effects on the Waitaki Power Scheme, and that protection should also extend to all renewable electricity generation activities, not just the Scheme's operation.	Seeks to insert new policy into a new Hydroelectricity Inundation subchapter in the Hazards and Risks section: HI-P2 Development in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas Within the Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas: 1. avoid the establishment of occupied buildings within the identified Waitaki Power Scheme Hydroelectricity Inundation High Hazard Area; and 2.avoid changes to existing land use activities in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Area that may increase the likelihood or scale of harm to people or property from hydroelectricity inundation, or the potential for reverse sensitivity effects on the Waitaki Power Scheme.
294.71	Meridian Energy Limited	General	General	Support	Considers that all provisions for non-energy activities in hydroelectricity inundation hazard areas should be relocated from the Energy Chapter to a new sub-chapter titled 'Hydroelectricity Inundation Hazard' within the Hazards and Risks section, as users are more likely to look there for property-related risk provisions.	Seeks to insert new rule into a new Hydroelectricity Inundation sub-chapter in the Hazards and Risks section: HI-R1 Occupied Buildings in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Area

						All zones Activity status: Permitted Where: PER-1 The occupied building is: 3. located at least 150m from the toe of the embankment of any canal, in fill or any dam or associated structure; and 4. designed so that any habitable floor area of any residential building is a minimum of300mm above the maximum inundation level that would result from a dam or canal breach; and PER-2 A certificate is submitted from a suitably qualified engineer confirming that the building will not raise or change the Potential Impact Classification (PIC) level (Low, Medium, High) under the Building Act 2004 or where the Potential Impact Classification is already Medium or High, will not increase the Population at Risk in a manner that would lead to a requirement to cease to operate, or to a requirement to upgrade, modify, or replace the hydroelectricity related structures or to significantly alter the operation of an affected portion of a hydroelectricity scheme; and PER-3 The occupied building is not located in a Waitaki Power Scheme Hydroelectricity Inundation High Hazard Area on the Planning Maps Activity status when compliance is not achieved: Discretionary Where: DIS-1 Compliance is not achieved with PER-1 and/or PER-2 Activity Status where compliance is not achieved: Non-complying Where: NC-1 Compliance is not achieved with PER-3.
294.72	Meridian Energy Limited	Historic Heritage	User Notes: Objectives, policies and rules relating to infrastructure activities on or within hi	Oppose	Considers clarification is needed in the user note, stating that objectives, policies, and rules for renewable electricity generation and the Waitaki Power Scheme are provided in the Energy Chapter, and no other provisions apply beyond those listed.	Seeks to amend as follows: Objectives, policies and rules relating to infrastructure activities on or within historic heritage items or their heritage settings are found in the Infrastructure Chapter. ~~and Energy Chapter. and o~~Objectives, policies and rules relating to the renewable electricity generation and the Waitaki Power Scheme are provided in the Energy Chapter. Beyond the provisions listed in the Energy Chapter, no other provisions in this plan apply to renewable electricity generation and the Waitaki Power Scheme.

294.73	Meridian Energy Limited	Notable Trees	User Notes: For some activities, a resource consent may be required by rules in more than one ch	Oppose	Considers clarification is needed in the user note, stating that objectives, policies, and rules for renewable electricity generation and the Waitaki Power Scheme are provided in the Energy Chapter, and no other provisions apply beyond those listed.	Seeks to amend as follows: Additional objectives, policies and rules relating to infrastructure activities when involving Notable Trees are found in the Infrastructure Chapter and ~~Energy Chapter.~~ objectives, policies and rules relating to the renewable electricity generation and the Waitaki Power Scheme are provided in the Energy Chapter. Beyond the provisions listed in the Energy Chapter, no other provisions in this plan apply to renewable electricity generation and the Waitaki Power Scheme.
294.74	Meridian Energy Limited	Sites and Areas of Significance to Maori	User Notes: Objectives, policies and rules relating to infrastructure activities within Sites an	Oppose	Considers the User Note about Sites and Areas of Significance to Māori is unclear and requests it be revised to clearly direct users to the relevant provisions in the Energy Chapter.	Seeks to amend as follows: Objectives, policies and rules relating to infrastructure activities within Sites and Areas of Significance to Māori are found in the Infrastructure Chapter and ~~Energy Chapter.~~ objectives, policies and rules relating to the renewable electricity generation and the Waitaki Power Scheme are provided in the Energy Chapter. Beyond the provisions listed in the Energy Chapter, no other provisions in this planapply to renewable electricity generation and the Waitaki Power Scheme.
294.75	Meridian Energy Limited	Ecosystems and Indigenous Biodiversity	User Notes: For some activities, a resource consent may be required by rules in more than one ch	Oppose	Considers the User Note is unclear and requests it be revised to clearly direct users to the relevant provisions in the Energy Chapter.	Seeks to amend as follows: Objectives, policies and rules relating to infrastructure activities within Significant Natural Areas are found in the Infrastructure Chapter and ~~Energy Chapter.~~ objectives, policies and rules relating to the renewable electricity generation and the Waitaki Power Scheme are provided in the Energy Chapter. Beyond the provisions listed in the Energy Chapter, no other provisions in this plan apply to renewable electricity generation and the Waitaki Power Scheme.
294.76	Meridian Energy Limited	Natural Character	User Notes: For some activities, a resource consent may be required by rules in more than one ch	Oppose	Considers the User Note is unclear and requests it be revised to clearly direct users to the relevant provisions in the Energy Chapter.	Seeks to amend as follows: Provisions related to infrastructure activities within riparian margins are also found in the Infrastructure Chapter and ~~Energy Chapter~~ objectives, policies and rules relating to the renewable electricity generation and the Waitaki Power Scheme are provided in the Energy Chapter. Beyond the provisions listed in the Energy Chapter, no other provisions in this plan apply to renewable electricity generation and the Waitaki Power Scheme.
294.77	Meridian Energy Limited	Natural Features and Landscapes	User Notes: Objectives, policies and rules relating to infrastructure activities within natural	Oppose	Considers the User Note is unclear and requests it be revised to clearly direct users to the relevant provisions in the Energy Chapter.	Seeks to amend as follows: Objectives, policies and rules relating to infrastructure activities within Significant Natural Areas are found in the Infrastructure Chapter~~and Energy Chapter. o~~Objectives, policies and rules relating to the renewable electricity generation and the Waitaki Power Scheme are provided in the Energy Chapter. Beyond the provisions listed in the Energy Chapter, no other provisions in this plan apply to renewable electricity generation and the Waitaki Power Scheme.

294.78	Meridian Energy Limited	Natural Features and Landscapes	The Waitaki district contains some of New Zealand's most outstanding and distinctive landscapes, wit	Support	Supports the positive acknowledgement of the man-made lakes associated with the Waitaki Power Scheme and their contribution to the district's landscape.	Seeks to retain as notified.
294.79	Meridian Energy Limited	Public Access	PA-O2 Provision of public access minimises adverse effects Public access to and along t	Oppose	Considers that minimising the effects of public access to lakes and rivers is insufficient and that such effects should be fully avoided to align with the NPS-REG.	Seeks to amend as follows: Public access to and along the District's rivers, lakes and coastal marine area is undertaken in a way that minimises adverse effects on critical facilities and regionally significant infrastructure, natural hazard mitigation works and vegetation, public health and safety, land based activities and primary production, natural character, ecological, landscape, historic heritage, cultural heritage or amenity values, and avoids adverse effects on the Waitaki Power Scheme .
294.80	Meridian Energy Limited	Public Access	PA-P1 Activities that protect and maintain public and customary access Enable activitie	Oppose	Considers the policy wording could expose the Waitaki Power Scheme to adverse effects from public access to lakes and rivers and that such effects should be avoided to comply with the NPS-REG.	Seeks to amend as follows: Enable activities that protect, maintain and, where practicable, enhance public and customary access to and along the coastal marine area, lakes and rivers where the activities avoid adverse effects on the Waitaki Power Scheme.
294.81	Meridian Energy Limited	Subdivision	SUB-O4 Subdivision and Regionally Significant Infrastructure Subdivision does not compromi	Support	Supports the objective and notes that renewable electricity generation is part of the definition of Regionally Significant Infrastructure and is consistent with the NPS-REG.	Retain as notified
294.82	Meridian Energy Limited	Subdivision	SUB-P6 Effects of subdivision on infrastructure Require subdivisions to be designed to min	Oppose	Considers that minimising the effects of subdivision on the Waitaki Power Scheme does not go far enough to be consistent with the NPS-REG and that such effects should be avoided.	Seeks to amend as follows: Require subdivisions to be designed to minimise any adverse effects, including reverse sensitivity effects on the safe and efficient operation, maintenance of, and access to Regionally Significant Infrastructure, and to avoid adverse effects on the Waitaki Power Scheme
294.83	Meridian Energy Limited	Subdivision	SUB-P8 Subdivision in Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas Only a	Oppose	General support for the policy but considers that to be consistent with the NPS-REG clause (2) should clearly address managing the potential for reverse sensitivity effects that would compromise the ongoing operation, maintenance or upgrade of the Waitaki Power Scheme, and clause (3) should be amended to more clearly prevent subdivision leading to an increased risk to people or property from hydroelectricity inundation	Seeks to amend as follows: ... 2. the subdivision will not increase the potential for reverse sensitivity effects that would compromise the ongoing operation, maintenance, or upgrade of the Waitaki Power Scheme; and 3. the subdivision will not increase the likelihood or scale of harm to people or property from hydroelectricity inundation ~~any risk to lives and well-being from an uncontrolled release of water from the Waitaki Power Scheme is acceptable.~~
294.84	Meridian Energy Limited	Subdivision	SUB-R12 Subdivision in the Waitaki Power Scheme	Support	Support for the rule and considers that along with SUB-P8, as amended by submission point 294.83 , appropriate protection can	Retain as notified

			Hydroelectricity Inundation Hazard Areas		be provided to the nationally significant Waitaki Power Scheme, while at the same time protecting people and property.	
294.85	Meridian Energy Limited	Activities on the Surface of Water	Regionally significant infrastructure, such as the Waitaki Power Scheme operate within and adjacent	Oppose	Considers that the introduction be amended to clarify the need to avoid adverse effects on the operation, maintenance, and upgrade of the Waitaki Power Scheme and other regionally significant infrastructure.	Seeks to amend as follows: Regionally significant infrastructure, such as the Waitaki Power Scheme, operate within and adjacent to waterbodies across the District. To achieve the outcomes for the District relating to regionally significant infrastructure and renewable electricity generation, ~~the~~ activities undertaken on the surface of water ~~provisions~~ need to ~~allow for their continued safe, efficient and effective use~~ avoid adverse effects on the operation, maintenance and upgrade of the Waitaki Power Scheme and other regionally significant infrastructure.
294.86	Meridian Energy Limited	Activities on the Surface of Water	User Notes: For some activities, a resource consent may be required by rules in more than one ch	Oppose	Opposes the user note as it states that relevant provisions for the Waitaki Power Scheme infrastructure are in Part B of the Energy Chapter, but Part B actually covers all renewable electricity generation activities associated with the Scheme. Also considers that the note is not clear enough and should be revised to provide greater certainty for plan users.	Seeks to amend as follows: ~~Objectives, policies and rules relating to the Waitaki Power Scheme infrastructure are found in Part B of the Energy Chapter.~~ Objectives, policies and rules relating to the renewable electricity generation and the Waitaki Power Scheme are provided in the Energy Chapter. Beyond the provisions listed in the Energy Chapter, no other provisions in this plan apply to renewable electricity generation and the Waitaki Power Scheme.
294.87	Meridian Energy Limited	Activities on the Surface of Water	ASW-O1 Protecting the values of waterbodies The surface of waterbodies in the Waitaki d	Support	Supports the objective to protect the Waitaki Power Scheme from adverse effects of activities on waterbodies.	Seeks to retain as notified.
294.88	Meridian Energy Limited	Activities on the Surface of Water	ASW-P1 Providing for recreational activities Provide for recreational activities on the	Oppose	Considers that recreational activities on water should avoid adverse effects on the Waitaki Power Scheme.	Seeks to amend as follows: Provide for recreational activities on the surface of water where: a) adverse effects on natural environment values, mana whenua values, current recreational values, amenity values, public health and safety, ~~and any values associated with the Waitaki Power Scheme,~~ are avoided, remedied or mitigated; and b) adverse effects on the Waitaki Power Scheme are avoided.
294.89	Meridian Energy Limited	Activities on the Surface of Water	ASW-P2 Commercial activities Provide for commercial surface water activities where it can	Oppose	Considers that commercial activities on water should avoid adverse effects on the Waitaki Power Scheme.	Seeks to amend as follows: Commercial activities Provide for commercial surface water activities where: a) it can be demonstrated that they maintain or enhance the natural environment values, mana whenua values, current recreational values, amenity values, and public health and safety, ~~and any values associated with the Waitaki Power Scheme;~~ and b) adverse effects on the Waitaki Power Scheme are avoided.
294.90	Meridian Energy Limited	Activities on the Surface of Water	ASW-P3 Structures and swing moorings Only allow	Oppose	Considers that structures and swing moorings on water should avoid adverse effects on the Waitaki Power Scheme.	Seeks to amend as follows:

			structures and swing moorings to pass a			Structures and swing moorings Only allow structures and swing moorings to pass across or through the surface of water where; a) any adverse effects on natural environment values, mana whenua values, amenity values, and public health and safety, ~~and the Waitaki Power Scheme~~ are avoided, remedied or mitigated; and b) adverse effects on the Waitaki Power Scheme are avoided.
294.91	Meridian Energy Limited	Activities on the Surface of Water	ASW-P6 Providing for the use of vessels associated with the Waitaki Power Scheme Provide f	Oppose	Considers that the use of vessels for the Waitaki Power Scheme should be enabled for operation, maintenance, and upgrading.	Seeks to amend as follows: Enable the use of surface water by ~~Provide for the use of~~ vessels associated with the operation, maintenance, ~~refurbishment, enhancement, monitoring~~, and upgrading ~~and development~~ of the Waitaki Power Scheme.
294.92	Meridian Energy Limited	Activities on the Surface of Water	ASW-R4 Use of vessels for the operation, maintenance, refurbishment, enhancement, monitoring,	Oppose	Considers that the rule should be amended to clarify permitted use of vessels for operation, maintenance, upgrading, and development of the Waitaki Power Scheme.	Seeks to amend as follows: Use of vessels on the surface of water for the operation, maintenance, ~~refurbishment, enhancement,~~ upgrading and monitoring, ~~upgrading and development~~ of the Waitaki Power Scheme and for the development of new hydro electricity generation activities associated with the Waitaki Power Scheme ...
294.93	Meridian Energy Limited	Earthworks	User Notes: For some activities, a resource consent may be required by rules in more than one ch	Oppose	Considers that as Parts A and B of the Energy should be standalone chapters, and that clarification is needed in the user note, specifying that only the Energy Chapter provisions apply to renewable electricity generation and the Waitaki Power Scheme.	Seeks to add the following: Objectives, policies and rules relating to the renewable electricity generation and the Waitaki Power Scheme are provided in the Energy Chapter. Beyond the provisions listed in the Energy Chapter, no other provisions in this plan apply to renewable electricity generation and the Waitaki Power Scheme.
294.94	Meridian Energy Limited	Light	User Notes: For some activities, a resource consent may be required by rules in more than one ch	Oppose	Considers that as Parts A and B of the Energy should be standalone chapters, and that clarification is needed in the user note, specifying that only the Energy Chapter provisions apply to renewable electricity generation and the Waitaki Power Scheme.	Seeks to add the following: Objectives, policies and rules relating to the renewable electricity generation and the Waitaki Power Scheme are provided in the Energy Chapter. Beyond the provisions listed in the Energy Chapter, no other provisions in this plan apply to renewable electricity generation and the Waitaki Power Scheme.
294.95	Meridian Energy Limited	Noise	User Notes: For some activities, a resource consent may be required by rules in more than one ch	Oppose	Considers that Parts A and B of the Energy Chapter should be standalone, consistent with other chapters in the PDP, and notes that the Noise Chapter's User Note fails to clarify this relationship.	Seeks to insert the following into the user note: Objectives, policies and rules relating to the renewable electricity generation and the Waitaki Power Scheme are provided in the Energy Chapter. Beyond the provisions listed in the Energy Chapter, no other provisions in this plan apply to renewable electricity generation and the Waitaki Power Scheme.
294.96	Meridian Energy Limited	Signs	User Notes: For some activities, a resource consent may be required by rules in more than one ch	Oppose	Considers that as Parts A and B of the Energy should be standalone chapters, and that clarification is needed in the user note, specifying that only the Energy Chapter provisions apply to renewable electricity generation and the Waitaki Power Scheme.	Seeks to add the following: Objectives, policies and rules relating to the renewable electricity generation and the Waitaki Power Scheme are provided in the Energy Chapter. Beyond the provisions listed in the Energy Chapter, no other provisions in this plan apply to renewable electricity generation and the Waitaki Power Scheme.

294.97	Meridian Energy Limited	General Rural Zone	User Notes: For some activities, a resource consent may be required by rules in more than one ch	Oppose	Considers that as Parts A and B of the Energy should be standalone chapters, and that clarification is needed in the user note, specifying that only the Energy Chapter provisions apply to renewable electricity generation and the Waitaki Power Scheme.	Seeks to add the following: Objectives, policies and rules relating to the renewable electricity generation and the Waitaki Power Scheme are provided in the Energy Chapter. Beyond the provisions listed in the Energy Chapter, no other provisions in this plan apply to renewable electricity generation and the Waitaki Power Scheme.
294.98	Meridian Energy Limited	WDC – Waitaki District Council	Ohau C Campground Designation Unique Identifier WDC-28 Designation Purpose Rec	Support	Supports condition (1) of the Ohau C Campground designation, as it helps prevent reverse sensitivity effects on the Waitaki Power Scheme by prohibiting new occupied buildings in the inundation hazard area.	Seeks to retain condition (1) of the Ohau C Campground designation as notified.
294.99	Meridian Energy Limited	Planning Maps	General	Oppose	Opposes the inconsistent use of terms for hydroelectricity inundation hazard areas across the planning maps and plan provisions and these should be referred to as the Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas and Waitaki Power Scheme Hydroelectricity Inundation High Hazard Areas. Also considers the map layers should be moved from the Infrastructure section to a renamed Hazards and Risks section for clarity and consistency.	Seeks to amend the map legend as follows: 1. Rename the Natural Hazards section as Hazard and Risks; and 2. Rename the WPS Hydroelectricity Inundation Hazard Areas and WPS Hydroelectricity Inundation High Hazard Areas as Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas and Waitaki Power Scheme Hydroelectricity Inundation High Hazard; and 3. Locate the Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas and Waitaki Power Scheme Hydroelectricity Inundation High Hazard layers under the heading Hazards and Risks.
294.102	Meridian Energy Limited	Definitions	Waitaki Power Scheme Core Sites means land that is owned by the owner of the Waitaki Pow	Oppose	Supports the definition of Waitaki Power Scheme Core Sites but seeks an amendment for clarity purposes.	Seeks to amend as follows: means land that is owned by the owner of the Waitaki Power Scheme and managed for hydro electricity generation purposes associated with the Waitaki Power Scheme.
294.103	Meridian Energy Limited	Definitions	Renewable electricity generation activities has the same meaning as in the National Poli	Support	Support for definition as set out in the NPS-REG	Seeks to retain as notified.
295.1	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	The Zone is made up of two areas, an 'Existing Mining Area' and a 'Potential Mining Area'. The Exist	Amend	Supports retaining the Special Purpose Zone Macraes Mining in the PDP with amendments as it appropriately enables mining activities that deliver economic, social, and cultural benefits to the district and region.	Seeks to amend as follows: The Zone includes land that is owned by OceanaGold, land over which OceanaGold has rights to minerals, land that is covered by minerals permits issued by the government and held by OceanaGold, or by resource consents held by OceanaGold for mining or mining related activities. The Zone is ~~made up of~~ divided into two areas, an 'Existing Mining Area' and a 'Potential Mining Area'. The Existing Mining Area refers to land that has either received resource consents (previous or current) for mining-related proposals or ~~and~~ has been the subject of disturbance during the excavation of pits, the construction of waste rock stacks, the construction of haul roads and other tracks, the construction of the gold processing plant as well as other ancillary infrastructure, and underground mining. Land that has been rehabilitated is farmed under lease and there are a number of covenants that have been put in place elsewhere, as a

						means to offset the loss of indigenous vegetation and habitat considered to be of value or to protect historic heritage.
295.2	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	The Potential Mining Area refers to land within the Zone that has not been mined or been subject to	Amend	Supports retaining the Special Purpose Zone Macraes Mining in the PDP with amendments as it appropriately enables mining activities that deliver economic, social, and cultural benefits to the district and region.	Seeks to amend as follows: ...There are early mining features with historic heritage values within this area as well as areas of indigenous vegetation and habitat for indigenous fauna which are likely to be considered of ~~considerable~~ value.
295.3	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	User Notes: For some activities, a resource consent may be required by rules in more than one ch	Amend	Opposes provisions that unnecessarily restrict access to the mineral resource in the Special Purpose Zone - Macraes Mining and supports treating it as a standalone zone that clearly identifies all relevant consent requirements, ensuring mining is not limited by generic provisions. District-wide rules should only apply in limited cases and must align with the zone's objectives and policies.	Seeks to amend as follows: The Special Purpose Zone: Macraes Mining is a "stand-alone" zone that recognises the economic, cultural and social benefits of accessing the significant mineral resource in the Hyde-Macraes Shear Zone and provides for the continuation of mining within the Zone. In that regard, the Special Purpose Zone: Macraes Mining provisions identify all the relevant consent requirements and standards applicable to mining activities within the zone to ensure that mining activity explicitly provided for and enabled by the zone is not precluded by other, unrelated provisions that have not been developed in the context of allowing for mining activities to occur as intended within the Zone. District wide provisions only apply to non-mining related activities in the Zone and only apply in the context of the objectives and policies relevant to the Special Purpose Zone: Macraes Mining. For some non-mining activities, a resource consent may be required by rules in more than one chapter in the District Plan. Plan users are encouraged to check all District-Wide Matters chapters. ... For new buildings or structures unrelated to mining activities, other relevant rules may include (but not limited to) the following; ...
295.4	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-O1 Purpose of the Special Purpose Zone – Macraes Mining The economic, cultural an	Amend	Supports the objective's recognition of the economic, cultural, and social benefits of mining in the Hyde-Macraes Shear Zone, but seeks inclusion of national, regional, and district benefits, and acknowledgement that some residual effects may occur and need to be offset, compensated, or accepted due to the functional need for mining in that location. Considers it should be acknowledged in order to give effect to the NPSIB, especially clause 3.10.	Seeks to retain the objective and amend to include reference to: 1. The national, regional and district benefits of mining activities in this zone. 2. Recognise that not all adverse effects can be fully avoided, remedied or mitigated and that provision needs to be made for enabling access to offsetting and compensation – and an acceptance that some residual effects may be acceptable in context of this zone given that mining activities have a functional need to be located where the mineral resource exists.

						3. “enabling” and providing for mining
295.5	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-P1 Existing Mining Areas The Existing Mining Area within the Special Purpose Zone	Amend	Supports the concept of Existing Mining Areas but considers the policy should focus on what activities are allowed within them, rather than describing the areas, which are already covered by definitions.	Seeks to delete the policy, or amend as follows: Provide for prospecting, exploration and mining activities within Existing Mining Areas where the adverse effects of such activities are not significantly different to lawfully established or authorised activities.
295.6	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-P2 Potential Mining Areas The Potential Mining Area within the Special Purpose Z	Amend	Supports the concept of Potential Mining Areas but believes the policy should focus on what activities are allowed, rather than describing the area, and notes that overlays like ONFLs, SNAs, and heritage sites may conflict with the zone’s purpose and should only apply where values are truly significant. Also considers this policy would be better placed in a general rural section of the plan such that these tests can be applied to other locations where such analysis has not yet been undertaken, as zoning for mining implies prior analysis confirming the area's suitability.	Seeks to delete the policy, or amend as follows: ~~The Potential Mining Area within the Special Purpose Zone - Macraes Mining applies to those areas where mining activities have not previously occurred in the zone, but which may be appropriate for mining activities, provided that they:~~ Provide for prospecting, exploration and mining activities within Potential Mining Areas, provided those activities: 1. avoid, remedy or mitigate the adverse effects from noise, vibration, or lighting,~~or from traffic~~ on amenity values in the adjoining General Rural Zone; and 2.~~in the first instance, avoid locating in:~~ ~~a. Outstanding Natural Features or Landscape;~~ ~~b. places containing historic heritage items; or~~ ~~c. Significant Natural Areas or areas of indigenous vegetation assessed as being significant under APP5 – Criteria for identifying areas that qualify as SNA; and~~ ~~3. if it is not practicable to avoid locating in those areas identified in 2(a) or 2(b) above because of the functional needs of the activity, then avoid, remedy or mitigate, as necessary, adverse effects on the values in order to maintain the exceptional, significant or outstanding nature of those areas; and~~ ~~4. if it is not practicable to avoid locating in areas identified under (2)(c) above, then managing the effects in accordance with Policy ECO-P2(2); and~~ ~~5. do not compromise the identified characteristics and values of any sensitive environment and achieve the relevant objectives and policies for the sensitive environment, except as provided for in 2 and 3 above; and~~

						6. avoid adverse effects on the health and safety of the community; and 7. reducing unavoidable adverse effects by: a. staging development for longer-term activities; and b. progressively rehabilitating the site, where possible; and/or c. offsetting or compensating for such effects; and 8. applying a precautionary approach (including adaptive management where appropriate) to assessing the effects of the activity where there is scientific uncertainty, and potentially significant or irreversible effects; and 9. where there is a conflict between this policy and other policies in the district plan (except in relation to the Historic Heritage Chapter), this policy shall prevail.
295.7	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers that a new policy is required to recognise that what may now be defined as "potential" mining areas may be mined in future and in that event, should then be managed in a manner consistent with "existing" mining areas.	Seeks to add a new policy as follows: SPZMM-PX Identification of Existing and Potential mining areas Where any new mining activity within the Special Purpose Zone - Macraes Mining is authorised by way of a resource consent or lawful approval process, regard that area as an Existing Mining Area subject to the Zone provisions for Existing Mining Areas.
295.8	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-P3 Rehabilitation after mining Require any new mining activity and quarrying acti	Amend	Considers the policy should provide scope to rehabilitate landforms with a vegetation type that differs from what existed previously.	Seeks to amend the policy to provide flexibility for replacement vegetation to be different in type to previous vegetation type.
295.9	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-P4 Exploration in the Potential Mining Area Recognise the need to investigate the	Amend	Considers the policy should be amended to refer to exploration anywhere within the Special Purpose Zone - Macraes Mining.	Seeks to amend as follows: SPZMM-P4 Exploration in the Potential Mining Area Special Purpose Zone — Macraes Mining Recognise the need to investigate the gold resource through exploration in the Special Purpose Zone — Macraes Mining Potential Mining Area, while controlling by permitting the activity to while: 1. avoiding, remedying or mitigateing the actual or potential adverse effects on amenity values in the adjoining General Rural Zone; and

						2. requiring rehabilitation of the disturbed ground unless mining activities follow; and 3. manage~~e~~ing adverse effects related to exploration in accordance with policy SPZMM-P2.
295.10	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-P5 Non-mining activities Enabling primary production, rural industry, recreationa	Amend	Considers that some of the identified activities in the policy are inappropriate to be enabled as of right in the Special Purpose Zone – Macraes Mining.	Seeks to amend as follows: Enable~~e~~ing primary production, rural industry, recreational activities, conservation activities, small-scale commercial activities, ~~visitor accommodation and residential activities~~ within the Special Purpose Zone – Macraes Mining where these are consistent with the purpose, character and qualities of the General Rural Zone and minimise the potential for reverse sensitivity effects.
295.11	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers a new policy is required to ensure that mine closure activities, considered part of "mining activities", are clearly recognised and provided for within the Special Purpose Zone – Macraes Mining, as these activities may continue long after mineral extraction ends.	Seeks to add a new policy as follows: SPZMM-PX Mine closure activities Provide for mining activities that continue after mineral extraction and processing has ceased and recognise that such activities are necessary to achieve successful mine closure.
295.12	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers that the current rule framework does not adequately provide for mining and related activities, nor does it effectively implement the objectives and policies of the Special Purpose Zone – Macraes Mining.	Seeks to ensure the rules for the Special Purpose Zone – Macraes Mining appropriately provide for mining activities and associated activities. Seeks specific relief in the form of new rules outlined in submission, or other such relief as to address OceanaGold's concern that the rule framework does not include adequate provision for mining.
295.13	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers that the SPZMM should be a standalone chapter, with all relevant rules and standards included, to avoid overlap with other chapters and ensure the zone's purpose is not undermined.	Seeks to include all relevant rules and standards that would otherwise apply to the SPZMM into the chapter to ensure it becomes a stand-alone chapter. This includes rules/standards relating to: - Noise (including vibration and blasting) - Lighting - Traffic - Earthworks - Hazardous substances - Indigenous vegetation / biodiversity

						- Riparian margins etc Seeks to apply appropriate limits that are fit for purpose for the SPZMM reflecting its purpose and significant benefits to the District. Seeks that standards for Existing Mining Areas should align with existing resource consent conditions as far as possible.
295.14	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R1 Building activity Special Purpose Zone - Macraes Mining Activity status: Per	Amend	Considers building activities connected to mining to fall within the definition of "mining activities," and seeks clarification that the rule applies only to unrelated building activities within the SPZMM.	Seeks to amend as follows: SPZMM-R1 Building activity <u>not associated with mining</u> ....
295.15	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R2 Prospecting Special Purpose Zone - Macraes Mining Activity status: Permitted	Support	Supports the provision for prospecting as a permitted activity within the entirety of the SPZMM.	Retain as notified.
295.16	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R3 Exploration Special Purpose Zone - Macraes Mining -Existing Mining Area Acti	Support	Considers that exploration is appropriate to occur as a permitted activity not subject to standards within the Existing Mining Area.	Retain as notified.
295.17	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers exploration should be provided for as a permitted activity within the Potential Mining Area, as it supports defining known mineral resources and suitable mining methods.	Seeks to add new rule as follows: <u>SPZMM-RX Exploration</u> <u>Special Purpose Zone - Macraes Mining</u> <u>Potential Mining Area</u> <u>Activity status: Permitted</u> <u>Where:</u> <u>1. Land disturbance must be restricted to 100 m2 per exploration site.</u> <u>2. the generation of noise, vibration and lighting must comply with Standards X, Y, and Z [equivalent to the zone standards for mining activities]; and</u> <u>3. The area must be rehabilitated (if not subsequently mined) as follows:</u>

						a. topsoil shall be stripped and stockpiled and be reused for rehabilitation purposes b. final rehabilitation earthworks shall be formed such that the contours and transitions closely resemble and blend in with the surrounding natural landform Activity status when compliance is not achieved: Controlled Matters of control are restricted to: 1. the duration, timing, frequency, extent and staging of works 2. the generation of noise, vibration and lighting; and 3. disturbance to land, including vegetation clearance; and 4. siting of tracks, parking areas, buildings or other equipment; and 5. adverse effects related to landscape, significant historic heritage and significant indigenous biodiversity; and 6. the matters addressed in the content of the rehabilitation plan. Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any applications for activities under this rule must provide, in addition to the standard information requirements, a rehabilitation plan.
295.18	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers that other mining activities (excluding underground mining, open pits, waste rock stacks, and tailings facilities) should be provided for as permitted activities in the Existing Mining Area if their effects are similar to existing or consented activities.	Seeks to add new rule as follows: SPZMM-RX Mining activities (excluding underground mining, open pits, waste rock stacks and tailings storage facilities) Special Purpose Zone - Macraes Mining Existing Mining Area Activity status: Permitted Where: 1. the generation of noise, vibration and lighting must comply with Standards A, B, and C [equivalent to conditions relating to noise,

						vibration and lighting on existing resource consents for mining activities]. 2. The area is rehabilitated upon completion of mining either: a. In accordance with a Rehabilitation Management Plan that is submitted to the Council upon completion of mining demonstrating how the rehabilitation will align with the rehabilitation obligations on existing land use consents; or b. As follows: i. topsoil shall be stripped and stockpiled and be reused for rehabilitation purposes ii. land shall be replanted with vegetation species that integrate with the adjacent vegetation community and which visually blends into the surrounding country iii. final rehabilitation earthworks shall be formed such that the contours and transitions closely resemble and blend in with the surrounding natural landform Activity status when compliance is not achieved: Controlled Matters of control are restricted to: 1. the duration, timing, frequency, extent and staging of works; and 2. the generation of noise, vibration, lighting and traffic; and 3. disturbance to land, including vegetation clearance and volumes of material to be removed in relation to the consequential size of any waste rock stacks; and 4. siting of buildings, infrastructure, or other equipment, including plant required to process minerals; and 5. landscaping treatment, including the shaping of the pits and pit margins, the siting and shaping of waste rock stacks and embankments, tailings impoundments, any other dams and the siting of roads and tracks; and 6. measures to manage long-term structural stability, environmental integrity, and safety of the pits, pit margins, waste

						rock stacks and embankments, tailings impoundments and any other dams, roads and private tracks; and 7. measures to maintain indigenous biodiversity; and 8. the matters addressed in the content of the rehabilitation plan. Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any applications for activities under this rule must provide, in addition to the standard information requirements, a rehabilitation plan
295.19	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers that mining activities (excluding underground mining, open pits, waste rock stacks and tailings storage facilities) should be provided for as permitted activities within the Potential Mining Area subject to standards.	Seeks to add new rule as follows: SPZMM-RX Mining activities (excluding underground mining, open pits, waste rock stacks and tailings storage facilities) Special Purpose Zone - Macraes Mining Potential Mining Area Activity status: Permitted Where: 1. the generation of noise, vibration and lighting must comply with Standards X, Y, and Z [equivalent to the zone standards for mining activities]. 2. The area is rehabilitated upon completion of mining as follows: a. topsoil shall be stripped and stockpiled and be reused for rehabilitation purposes b. land shall be replanted with vegetation species that integrate with the adjacent vegetation community and which visually blends into the surrounding country c. final rehabilitation earthworks shall be formed such that the contours and transitions closely resemble and blend in with the surrounding natural landform Activity status when compliance is not achieved: Controlled Matters of control are restricted to:

						1. the duration, timing, frequency, extent and staging of works; and 2. the generation of noise, vibration, lighting and traffic; and 3. disturbance to land, including vegetation clearance and volumes of material to be removed in relation to the consequential size of any waste rock stacks; and 4. siting of buildings, infrastructure, or other equipment, including plant required to process minerals; and 5. landscaping treatment, including the shaping of the pits and pit margins, the siting and shaping of waste rock stacks and embankments, tailings impoundments, any other dams and the siting of roads and tracks; and 6. measures to manage long-term structural stability, environmental integrity, and safety of the pits, pit margins, waste rock stacks and embankments, tailings impoundments and any other dams, roads and private tracks; and 7. measures to maintain indigenous biodiversity; and 8. the matters addressed in the content of the rehabilitation plan. Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any applications for activities under this rule must provide, in addition to the standard information requirements, a rehabilitation plan
295.20	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers that underground mining should be provided for as a permitted activity within the Existing Mining Area.	Seeks to add new rule as follows: SPZMM-RX Underground mining Special Purpose Zone - Macraes Mining Existing Mining Area Activity status: Permitted Activity status when compliance is not achieved: Not applicable
295.21	OceanaGold (New	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers that underground mining should be provided for as a controlled activity within the Potential Mining Area.	Seeks to add new rule as follows:

	Zealand) Limited					SPZMM-RX Underground mining Special Purpose Zone - Macraes Mining Potential Mining Area Activity status: Controlled Matters of control are restricted to: 1. the generation of noise and vibration; and 2. adverse effects on land stability. Activity status when compliance is not achieved: Not applicable
295.22	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers that the extension of waste rock stacks, open pits, and tailings storage facilities should be provided for as permitted activities within the Existing Mining Area subject to those activities not having adverse effects that differ significantly from existing or consented activities in those areas.	Seeks to add new rule as follows: SPZMM-RX Extension of waste rock stacks, open pits, and tailings storage facilities Special Purpose Zone - Macraes Mining Existing Mining Area Activity status: Permitted Where: 1. the generation of noise, vibration and lighting must comply with Standards A, B, and C [equivalent to conditions relating to noise, vibration and lighting on existing resource consents for mining activities]. 2. The area is rehabilitated upon completion of mining either: a. In accordance with a Rehabilitation Management Plan that is submitted to the Council upon completion of mining demonstrating how the rehabilitation will align with the rehabilitation obligations on existing land use consents; or b. As follows:

						i. topsoil shall be stripped and stockpiled and be reused for rehabilitation purposes ii. open pits shall be backfilled to the extent practicable or other wise left to form lakes iii. land shall be replanted with vegetation species that integrate with the adjacent vegetation community and which visually blends into the surrounding country iv. final rehabilitation earthworks shall be formed such that the contours and transitions closely resemble and blend in with the surrounding natural landform Activity status when compliance is not achieved: Controlled Matters of control are restricted to: 1. the duration, timing, frequency, extent and staging of works; and 2. the generation of noise, vibration, lighting and traffic; and 3. disturbance to land, including vegetation clearance and volumes of material to be removed in relation to the consequential size of any waste rock stacks; and 4. siting of buildings, infrastructure, or other equipment, including plant required to process minerals; and 5. landscaping treatment, including the shaping of the pits and pit margins, the siting and shaping of waste rock stacks and embankments, tailings impoundments, any other dams and the siting of roads and tracks; and 6. measures to manage long-term structural stability, environmental integrity, and safety of the pits, pit margins, waste rock stacks and embankments, tailings impoundments and any other dams, roads and private tracks; and 7. measures to maintain indigenous biodiversity; and 8. the matters addressed in the content of the rehabilitation plan. Note: Section 88 Information Requirements for Applications:

						Pursuant to s88 of the RMA, any applications for activities under this rule must provide, in addition to the standard information requirements, a rehabilitation plan
295.23	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers that the extension of waste rock stacks, open pits, and tailings storage facilities should be provided for as controlled activities within the Potential Mining Area as such activities are anticipated in this area.	Seeks to add new rule as follows: SPZMM-RX Extension of waste rock stacks, open pits, and tailings storage facilities Special Purpose Zone - Macraes Mining Potential Mining Area Activity status: Controlled Matters of control are restricted to: 1. the duration, timing, frequency, extent and staging of works; and 2. the generation of noise, vibration, lighting and traffic; and 3. disturbance to land, including vegetation clearance and volumes of material to be removed in relation to the consequential size of any waste rock stacks; and 4. siting of buildings, infrastructure, or other equipment, including plant required to process minerals; and 5. landscaping treatment, including the shaping of the pits and pit margins, the siting and shaping of waste rock stacks and embankments, tailings impoundments, any other dams and the siting of roads and tracks; and 6. measures to manage long-term structural stability, environmental integrity, and safety of the pits, pit margins, waste rock stacks and embankments, tailings impoundments and any other dams, roads and private tracks; and 7. measures to maintain indigenous biodiversity; and 8. the matters addressed in the content of the rehabilitation plan. Note: Section 88 Information Requirements for Applications:

						Pursuant to s88 of the RMA, any applications for activities under this rule must provide, in addition to the standard information requirements, a rehabilitation plan
295.24	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers that the construction of new waste rock stacks, open pits, and tailings storage facilities should be provided for as controlled activities within the Existing Mining Area as these activities are expected but may have different effects than those currently occurring or consented in the Existing Mining Area.	Seeks to add new rule as follows: SPZMM-RX Construction of new waste rock stacks, open pits, and tailings storage facilities Special Purpose Zone - Macraes Mining Existing Mining Area Activity status: Controlled Matters of control are restricted to: 1. the duration, timing, frequency, extent and staging of works; and 2. the generation of noise, vibration, lighting and traffic; and 3. disturbance to land, including vegetation clearance and volumes of material to be removed in relation to the consequential size of any waste rock stacks; and 4. siting of buildings, infrastructure, or other equipment, including plant required to process minerals; and 5. landscaping treatment, including the shaping of the pits and pit margins, the siting and shaping of waste rock stacks and embankments, tailings impoundments, any other dams and the siting of roads and tracks; and 6. measures to manage long-term structural stability, environmental integrity, and safety of the pits, pit margins, waste rock stacks and embankments, tailings impoundments and any other dams, roads and private tracks; and 7. measures to maintain indigenous biodiversity; and 8. the matters addressed in the content of the rehabilitation plan. Note: Section 88 Information Requirements for Applications:

						Pursuant to s88 of the RMA, any applications for activities under this rule must provide, in addition to the standard information requirements, a rehabilitation plan
295.25	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers new waste rock stacks, open pits, and tailings storage facilities should be provided for as restricted discretionary activities in the Potential Mining Area, due to their anticipated but potentially new environmental effects.	Seeks to add new rule as follows: SPZMM-RX Construction of new waste rock stacks, open pits, and tailings storage facilities Special Purpose Zone - Macraes Mining Potential Mining Area Activity status: Restricted Discretionary Matters of discretion are restricted to: 1. the duration, extent, location and staging of the excavation and construction of pits, pit margins, waste rock stacks and embankments, tailings impoundments and any other dams, roads, buildings and tracks associated with mining; and 2. the generation of noise, vibration, lighting and traffic; and 3. disturbance to land, including vegetation clearance and volumes of material to be removed in relation to the consequential size of any waste rock stacks; and 4. the location of plant used to process any mineral; and 5. landscaping treatment, including the siting and shaping of the pits, pit margins, waste rock stacks and embankments, tailings impoundments and any other dams, and the siting of roads and tracks; and 6. measures to manage long-term structural stability, environmental integrity, and safety of the pits, pit margins, waste rock stacks and embankments, tailings impoundments and any other dams, roads and tracks; and 7. adverse effects on, and measures to maintain indigenous biodiversity, landscape, heritage and cultural values; and 8. the regional and national benefits associated with the mineral extraction; and

						9. any biodiversity offsetting or biodiversity compensation provided by the applicant in accordance with the biodiversity effects management hierarchy; and 10. the matters addressed in the content of the rehabilitation plan. Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any applications for activities under this rule must provide, in addition to the standard information requirements, a rehabilitation plan
295.26	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers that a new rule permitting subdivision linked to mining activities should be added to support efficient mineral access and smooth transition to post-mining land uses.	Seeks to add new rule as follows: SPZMM – RX Subdivision for mining activities Special Purpose Zone - Macraes Mining Activity status: Permitted Where: PER-1 The subdivision is solely for the purpose of facilitating mining activities including mine closure. Activity status when compliance is not achieved: Discretionary
295.27	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R4 Primary production activities (excluding carbon forestry otherwise provided for in SP	Support	Support for the rule. No specific reasons given.	Retain as notified
295.28	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R6 Residential activity Special Purpose Zone - Macraes Mining Activity status:	Oppose	Considers residential activities inappropriate as permitted uses in the SPZMM, as they conflict with the zone's purpose and risk reverse sensitivity. Temporary worker accommodation may be needed but would fall under "mining activities" and not rely on this rule.	Seeks to delete the rule.
295.29	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R7 Residential unit Special Purpose Zone - Macraes Mining Activity status: Perm	Oppose	Consider it inappropriate to permit residential activities in the SPZMM as this could lead to reverse sensitivity effects.	Seeks to delete the rule.
295.30	OceanaGold (New	Special Purpose Zone: Macraes Mining Zone	SPZMM-R8 Accessory building Special Purpose Zone -	Support	Support for the rule. No specific reasons given.	Retain as notified.

	Zealand) Limited		Macraes Mining Activity status: Pe			
295.31	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R9 Minor residential unit Special Purpose Zone - Macraes Mining Activity status	Oppose	Does not support the establishment of residential units within the zone as this could lead to reverse sensitivity effects.	Seeks to delete the rule.
295.32	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R10 Visitor accommodation Special Purpose Zone - Macraes Mining Activity status	Oppose	Opposes sensitive activities near existing mining operations in the SPZMM due to health and safety risks. While on-site staff accommodation may be needed, it would fall under “mining activities” and not rely on this rule.	Seeks to delete the rule.
295.33	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R11 Home business (excluding primary production activity) Special Purpose Zone -	Oppose	Does not consider this activity to be consistent with the intent and purpose of this zone as set out in SPZMM-O1.	Seeks to delete the rule.
295.34	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R12 Intensive indoor primary production and intensive outdoor primary production	Amend	Considers that farming activities and mining activities can co-locate, but notes that there would clearly be issues with operational mining areas should this intensive activity occur in close proximity to these sites.	Seeks to retain as notified - also seeks to include provisions so that operational mining areas are not affected by the establishment of these activities in the zone. Including suitable setbacks from operational mining areas would be appropriate in this regard.
295.35	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R13 Recreational activity Special Purpose Zone - Macraes Mining Activity status	Amend	Considers that whilst post mining activity recreational opportunities could be created in some locations of the zone, there would clearly be operational health and safety concerns should this activity occur during active mining phases.	Seeks to amend the rule to suitably recognise that this activity would not be compatible with active operational mining areas.
295.36	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R14 Conservation activities Special Purpose Zone - Macraes Mining Activity stat	Amend	Considers conservation activities connected to mining as part of “mining activities,” and clarifies that the rule only applies to conservation activities not linked to mining within the SPZMM.	Seeks to amend as follows: SPZMM-R14 Conservation activities <u>not associated with mining</u> ...
295.37	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R15 Commercial activity Special Purpose Zone - Macraes Mining Activity status:	Oppose	Opposes allowing commercial activities in active mining areas and questions how the rule would apply in practice, including whether small outlets like a staff tuck shop would be permitted.	Seeks to delete the provision.
295.38	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R16 Aeroplane airstrips and helicopter landing areas, and the use of these by aircraft	Amend	Supports helicopter use for mining (a primary production activity) but recommends expanding the rule to include aircraft activity for exploration, prospecting, and conservation and not just primary production.	Seeks to amend the rule so that it provides for a wider range of activities that may require the use of aircraft as a necessary component.
295.39	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R17 Carbon forestry Special Purpose Zone - Macraes Mining Activity status: Perm	Amend	Supports carbon forestry in the Macraes Zone but considers provision should be made for the planting of exotic species as part of carbon forestry, and for planting to occur on mapped highly productive land within the zone (if any).	Seeks to amend the rule so that planting of exotic species is provided for as part of carbon forestry, including amending DIS-2 and PRO-1 so that exotic planting on Rural Scenic Landscape or sensitive environment within the zone (if any) is not prohibited, and forestry can be planted on mapped highly productive land within the zone (if any) .

295.40	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R18 Exploration Special Purpose Zone – Macraes Mining - Potential Mining Area A	Oppose	Considers that exploration activities should be permitted throughout the zone as this would properly reflect the purpose of the zone and the low level of effects associated with exploration activities.	Seeks to delete the rule and replace with new permitted activity rules for exploration.
295.41	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R19 Mining activities Special Purpose Zone – Macraes Mining - Existing Mining Are	Oppose	Considers that existing and some new mining activities should be permitted in the Existing Mining Area to reflect the zone's enabling intent, and considers that it may be appropriate for some new mining activities to require resource consent and proposes a new suite of rules which address its concerns [refer to prior submission points].	Seeks to delete the rule and replace with new rules for mining activities outlined above [refer to previous submission points].
295.42	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R20 Mining Activities Special Purpose Zone - Macraes Mining – Potential Mining Ar	Oppose	Considers that some new mining activities should be permitted in the Potential Mining Area and considers that it may be appropriate for some new mining activities to require resource consent and proposes a new suite of rules which address its concerns [refer to prior submission points].	Seeks to delete the rule and replace with new rules for mining activities outlined above [refer to previous submission points].
295.43	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R21 Rural Industry Special Purpose Zone - Macraes Mining Activity status: Res	Amend	Considers that clarification is needed that the rule applies only to rural industry activities not connected to mining, as it considers mining-related activities to fall within the definition of "mining activities."	Seeks to amend as follows: SPZMM-R21 Rural Industry <u>not associated with mining</u> Special Purpose Zone - Macraes Mining ....
295.44	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R22 Any other activity not provided for as a permitted, controlled, restricted discretio	Support	Supports retention of a discretionary activity status in particular for mining activities that are not otherwise provided for by rules with a permitted, controlled or restricted discretionary activity status.	Seeks to retain as notified.
295.45	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R23 Retirement village Special Purpose Zone - Macraes Mining Activity status: N	Amend	Supports the rule but notes there may also be other sensitive activities that need to be similarly assessed as a non-complying activity for this zone (e.g. residential activities, hospitals, visitor accommodation, etc).	Seeks to include other sensitive activities in this non-complying rule for the SPZMM.
295.46	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R24 Educational facility Special Purpose Zone - Macraes Mining Activity status:	Amend	Supports the rule's intent but seeks clarification to ensure onsite training activities, which it considers part of "mining activities," are not mistakenly classified as "education facilities" and rendered non-complying.	Seek to ensure that this rule does not inadvertently capture education and training activities undertaken by OceanaGold as part of operating mining activities within the zone.
295.47	OceanaGold (New Zealand) Limited	General Approach	Part 2 – District wide matters	Amend	Supports the Plan's alignment with the National Planning Standards but recommends that the SPZMM is a standalone chapter to ensure clarity and avoid conflicts with district-wide provisions.	Seeks to clairfy in the framework of the Plan that the SPZMM is a stand alone chapter of the Plan.
295.48	OceanaGold (New Zealand) Limited	Relationship Between Spatial Layers	Overlays are applied to areas which have specific values or risks that need to be managed carefully.	Amend	Supports the overlay guidance but believes the SPZMM should remain free of overlays unless they are clearly justified both environmentally and economically, to preserve the zone's enabling intent.	Seeks to delete any overlays affecting the SPZMM, unless they can be sufficiently justified from both an environmental and economic position, such that their retention is appropriate in accordance with Section 32 of the RMA.
295.50	OceanaGold (New	Definitions	Biodiversity offset has the same meaning as in the	Support	Supports this definition and its inclusion in policies and rules.	Seeks to retain as notified.

	Zealand) Limited		National Policy Statement on Indigeno			
295.51	OceanaGold (New Zealand) Limited	Definitions	Earthworks NPS means the alteration or disturbance of land, including by moving, remov	Support	Supports the definition as consistent with the National Planning Standards, but recommends clarifying that it does not include mining or other extractive-type activities within the SPZMM.	Seeks to amend the definition to clarify that it does not include mining or other extractive-type activities
295.52	OceanaGold (New Zealand) Limited	Definitions	Existing Mining Area means land within the Special Purpose Zone Macraes Mining that has	Amend	Supports identifying areas in the SPZMM with existing approvals or permitted mining activities, and seeks to ensure this includes undeveloped areas with opriate approvals and that the defined area can expand as new lawful and/or consented mining activities occur.	Seeks to amend as follows: means land within the Special Purpose Zone Macraes Mining that has either received a resource consent (previous or current) for mining-related proposals or ~~and~~ has been the subject of disturbance during the excavation of pits, the construction of waste rock stacks, the construction of haul roads and other tracks, the construction of gold processing plant as well as other ancillary infrastructure and underground mining.
295.53	OceanaGold (New Zealand) Limited	Definitions	Exploration has the same meaning as in the Crown Minerals Act, 1991 (as set out below):	Support	Supports the definition as it appropriately provides for exploration activities.	Seeks to retain as notified.
295.54	OceanaGold (New Zealand) Limited	Definitions	Functional need NPS means the need for a proposal or activity to traverse, locate or o	Support	Supports the definition as it is consistent with the National Planning Standards.	Seeks to retain as notified.
295.55	OceanaGold (New Zealand) Limited	Definitions	Hazardous substance NPS has the same meaning as in section 2 of the RMA: includes,	Support	Supports the definition as it is consistent with the definition used in the RMA.	Seeks to retain as notified.
295.56	OceanaGold (New Zealand) Limited	Definitions	Heritage Setting means an area of land around and adjoining a Historic Heritage Item tha	Support	Supports the definition as notified, specifically the spatial identification of the land in the District Plan.	Seeks to retain as notified.
295.57	OceanaGold (New Zealand) Limited	Definitions	Historic Heritage Item means any structure, item or place identified in SCHED2 – Histo	Support	Supports the definition - no specific reasons given.	Seeks to retain as notified.
295.58	OceanaGold (New Zealand) Limited	Definitions	Indigenous vegetation has the same meaning as in the National Policy Statement for Indig	Support	Supports the definition as it reflects the definition in the NPS-IB.	Seeks to retain as notified.
295.59	OceanaGold (New Zealand) Limited	Definitions	Land disturbance NPS means alteration or disturbance of land, (or any matter constitut	Support	Supports the definition as it is consistent with the National Planning Standards.	Seeks to retain as notified.

295.60	OceanaGold (New Zealand) Limited	Definitions	Light sensitive environments means the following overlay areas and zones: Significant	Oppose	Opposes the definition, specifically the inclusion of riparian margins.	Seeks to delete the definition. Alternatively, seeks to delete Outstanding Natural Landscapes, Outstanding Natural Features, Significant Natural Features, riparian margins, Open Space Zone, and Rural Scenic Landscapes from this definition.
295.61	OceanaGold (New Zealand) Limited	Definitions	Major hazard facility has the same meaning as the Health and Safety at Work (Major Haz	Support	Supports the definition as it reflects the definition of the Health and Safety at Work (Major Hazard Facilities) Regulations.	Seeks to retain as notified.
295.62	OceanaGold (New Zealand) Limited	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition of mineral.	Seeks to retain as notified.
295.63	OceanaGold (New Zealand) Limited	Definitions	Mining activities means the use of land and buildings and associated infrastructure for	Amend	Supports the definition of 'mining activities' but recommends expanding it to clearly include transport, infrastructure maintenance, upgrades, and mine closure activities.	Seeks to amend as follows: means the use of land and buildings and associated infrastructure for the primary purpose of the extraction, winning, excavation, taking, transport and ~~associated~~ processing of minerals and any ancillary activity related to mining including maintenance and upgrading of mining related infrastructure, the deposition of overburden material in waste rock stacks, rehabilitation and mine closure activities, landscaping and cleanfill and the use of land and accessory buildings associated with the operation of the mine, but does not include prospecting and exploration and quarrying activities.
295.64	OceanaGold (New Zealand) Limited	Definitions	Operational need NPS means the need for a proposal or activity to traverse, locate or	Support	Supports the definition as it is consistent with the National Planning Standards.	Seeks to retain as notified.
295.65	OceanaGold (New Zealand) Limited	Definitions	Potential Mining Area means land within the Special Purpose Zone - Macraes Mining that h	Amend	Supports the inclusion of Potential Mining Areas in the SPZMM but seeks to ensure they aren't restricted by overlays or conflicting provisions, and that the definition clearly distinguishes them from Existing Mining Areas, together covering the full zone.	Seeks to amend as follows: means land within the Special Purpose Zone - Macraes Mining that has not been mined or subject to any mining related disturbance and does not have a resource consent for a mining-related activity. Potential Mining Area includes all land within the Special Purpose Zone – Macraes Mining that is not an Existing Mining Area Also seeks to ensure that these areas are not unduly fettered with other overlays or planning provisions which either directly or inadvertently restrict mining activities from developing there in the future.
295.66	OceanaGold (New Zealand) Limited	Definitions	Primary production NPS means: any aquaculture, agricultural, pastoral, horticultura	Support	Suuports the definition as it is consistent with the National Planning Standards.	Seeks to retain as notified.

295.67	OceanaGold (New Zealand) Limited	Definitions	Prospecting has the same meaning as in the Crown Minerals Act, 1991: means any activi	Support	Supports the definition as it is consistent with the definition set out in the CMA.	Seeks to retain as notified.
295.68	OceanaGold (New Zealand) Limited	Definitions	Quarry NPS means a location or area used for the permanent removal and extraction of a	Support	Supports the definition - no specific reasons given.	Seeks to retain as notified.
295.69	OceanaGold (New Zealand) Limited	Definitions	Quarrying activity NPS means the extraction, processing (including crushing, screening	Support	Supports the definition of quarrying activities as it considers it to be appropriately comprehensive.	Seeks to retain as notified.
295.70	OceanaGold (New Zealand) Limited	Definitions	Residual risk in relation to hazardous substances, means any risk of an adverse effect	Support	Supports the definition - no specific reasons given.	Seeks to retain as notified.
295.71	OceanaGold (New Zealand) Limited	Definitions	Restricted use quarry means a location or area used for the permanent removal and extrac	Support	Supports the definition - no specific reasons given.	Seeks to retain as notified.
295.72	OceanaGold (New Zealand) Limited	Definitions	Reverse sensitivity means the potential for the operation of an existing lawfully establ	Support	Support for the definition but recommends including yet to be implemented resource consents as considered to form part of the existing environment.	Seeks to amend as follows: means the potential for the operation of an existing, <u>permitted,</u> lawfully established <u>or approved</u> activity to be compromised, constrained, or curtailed by ~~the more recent~~ establishment or alteration of another activity which may be sensitive to the actual, potential or perceived adverse environmental effects generated by an existing<u>, permitted, lawfully established or approved</u> activity.
295.73	OceanaGold (New Zealand) Limited	Definitions	Riparian margin means: for land in the General Rural Zone, all landward property adjo	Oppose	Opposes the definition of riparian margins, as applying it to rural landscapes, especially in the SPZMM, creates consenting challenges due to variable river flows, other dynamic features in the landscape and unclear wetland boundaries.	Seeks to delete the definition as riparian margins will likely differ in different contexts and locations.
295.74	OceanaGold (New Zealand) Limited	Definitions	Sensitive activity means: residential activity, including papakāika; marae; education	Support	Supports the definition - no specific reasons given.	Seeks to retain as notified.
295.75	OceanaGold (New Zealand) Limited	Definitions	Sensitive environment area of land contained within any of the following areas: Coa	Oppose	Supports parts of the definition but is concerned that applying overlays to the SPZMM, especially labeling areas as “sensitive”, creates consenting challenges and conflicts with the zone’s purpose of enabling ongoing mining.	Seeks to delete the definition or otherwise ensure activities in the SPZMM are not affected by overlays. Or, seeks to delete clauses (10) and (11) – these areas are arbitrary and not equal in all locations and circumstances.
295.76	OceanaGold (New	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Amend	Considers the definition should be amended to focus only on indigenous vegetation and clarify that hydrological changes, like	Seeks to amend as follows:

	Zealand) Limited				water diversion or abstraction, don't always equate to vegetation clearance, especially in the SPZMM.	Indigenous Vegetation Clearance means the removal, trimming, felling, or modification of ~~any~~ indigenous vegetation ~~or the deliberate alteration of hydrological functions that support indigenous vegetation~~. ...
295.77	OceanaGold (New Zealand) Limited	Strategic Direction	The strategic direction objectives will be particularly relevant for any future changes to the Plan	Amend	Supports the intent of the introduction but considers that the third paragraph could be more succinctly drafted, while still providing clear guidance to plan users.	Seeks to amend as follows: The strategic direction objectives may also be relevant to the assessment of resource consent applications, notices of requirement for designations, and in directing future changes to the Plan. ~~The strategic direction objectives will be particularly relevant for any future changes to the Plan and any significant or complex resource consent applications. In addition to the specific objectives and policies contained in topic chapters of the Plan, relevant strategic direction objectives in this Chapter will also need to be assessed for any activity identified as discretionary or non-complying.~~
295.78	OceanaGold (New Zealand) Limited	Strategic Direction	SD-CHI-O1 Character and Identity Waitaki's character, historic and cultural heritage, a	Amend	Considers the objectives are too absolute in requiring protection of all features. The submitter supports protection where appropriate, but recommends focusing on the values of features, such as landscapes, hitoric heritage or cultural areas, rather than requiring full protection to better align with the RMA and support appropriate devemopment within the SPZMM.	Seeks to amend as follows: Waitaki's character, historic and cultural heritage, and identity is recognised and the values protected throughout the District.
295.79	OceanaGold (New Zealand) Limited	Strategic Direction	SD-CHI-O2 Recognition, protection, and future opportunities for Waitaki's heritage Reco	Amend	Considers the objectives are too absolute in requiring protection of all features. The submitter supports protection where appropriate, but recommends focusing on the values of features, such as landscapes, hitoric heritage or cultural areas, rather than requiring full protection to better align with the RMA and support appropriate devemopment within the SPZMM.	Seeks to amend as follows: Recognise the outstanding contribution that historic heritage makes to the Waitaki district by protecting the heritage values of buildings, items, areas and features and providing opportunities for the ongoing use and adaptive re-use of our heritage buildings and areas.
295.80	OceanaGold (New Zealand) Limited	Strategic Direction	SD-NE-O1 Natural character, landscapes and features and ecosystems Protection, restorat	Amend	Considers the objectives are too absolute in requiring protection of all features. The submitter supports protection where appropriate, but recommends focusing on the values of features, such as landscapes, hitoric heritage or cultural areas, rather than requiring full protection to better align with the RMA and support appropriate devemopment within the SPZMM.	Seeks to amend as follows: Protection of the natural character, outstanding natural landscapes and~~,~~ features and significant ecosystem~~s~~ values which strongly contribute to Waitaki's unique character, identity, and indigenous biodiversity from inappropriate subdivision, use, and development.
295.81	OceanaGold (New Zealand) Limited	Strategic Direction	SD-RRNH-O1 Natural hazards Improve the District's resilience to natural hazards, and wh	Support	Supports the objective - no specific reasons given.	Seeks to retain as notified.

295.82	OceanaGold (New Zealand) Limited	Strategic Direction	SD-RA-O1 Productive rural environments Rural productive opportunities are enabled in th	Support	Supports for the objective - considers it is important to recognise the significant contribution that primary production activities (which include mining) provide to the Waitaki District.	Seeks to retain as notified.
295.83	OceanaGold (New Zealand) Limited	Strategic Direction	SD-RA-O3 Rural character and reverse sensitivity Ensure activities in rural areas remai	Support	Support for the objective - considers it is appropriate to ensure existing activities are able to operate without being inappropriately constrained by reverse sensitivity effects arising due to incompatible activities taking place in areas within or adjacent to existing primary production (including mining) / rural activities.	Seeks to retain as notified.
295.84	OceanaGold (New Zealand) Limited	Strategic Direction	General	Amend	Considers that clear recognition should be made of the Hyde-Macraes Shear Zone in the Strategic Direction chapter to support the SPZMM through a new objective enabling mineral extraction, reflecting the area's significant economic contribution.	Seeks to add the following new objective:: To recognise the Hyde-Macraes Shear Zone as a significant mineral resource, thereby enhancing the social and economic well-being of the community.
295.85	OceanaGold (New Zealand) Limited	Strategic Direction	General	Amend	Considers that clear recognition should be made of the Hyde-Macraes Shear Zone in the Strategic Direction chapter to support the SPZMM through a new objective enabling mineral extraction, reflecting the area's significant economic contribution.	Seeks to add the following new objective: To enable mineral extraction and ancillary activities which support it, including specifically within the Special Purpose Zone – Macraes Mining.
295.86	OceanaGold (New Zealand) Limited	Transport	TRAN-R1 Vehicle crossings onto roads All zones Activity status: Permitted Where: PE	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.87	OceanaGold (New Zealand) Limited	Transport	TRAN-R2 Site access for activities without any on-site vehicle parking space or loading spaces	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.88	OceanaGold (New Zealand) Limited	Transport	TRAN-R3 On-site parking, loading, and access All zones Activity status: Permitted W	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.89	OceanaGold (New Zealand) Limited	Transport	TRAN-R4 Vehicle trip generating activities All zones Activity status: Permitted Whe	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.90	OceanaGold (New Zealand) Limited	Transport	TRAN-R5 Walkways, cycleways and shared paths which are located on public land other than a roa	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.

295.91	OceanaGold (New Zealand) Limited	Transport	TRAN-R6 Extensions and new vehicle access tracks ancillary to infrastructure, outside of any o	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.92	OceanaGold (New Zealand) Limited	Transport	TRAN-R7 Transport network ancillary infrastructure All zones Activity status: Permitt	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.93	OceanaGold (New Zealand) Limited	Transport	TRAN-S1 Pedestrian and cycling access The site must: have a direct legal road frontag	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.94	OceanaGold (New Zealand) Limited	Transport	TRAN-S2 Firefighting access Any access to a site located in an area where no fully ret	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.95	OceanaGold (New Zealand) Limited	Transport	TRAN-S3 Service lanes, private ways, private roads, pedestrian accessways and walkways	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.96	OceanaGold (New Zealand) Limited	Transport	TRAN-S4 On-site reverse manoeuvring On-site manoeuvring must be provided for a minimum	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.97	OceanaGold (New Zealand) Limited	Transport	TRAN-S5 Design standards for vehicle manoeuvring areas Areas must be provided on a sit	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.98	OceanaGold (New Zealand) Limited	Transport	TRAN-S6 Service Stations and Truck Stops Site access and manoeuvring space for service	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.99	OceanaGold (New Zealand) Limited	Transport	TRAN-S7 On-site loading spaces for non-residential activities The number of loading sp	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.

295.100	OceanaGold (New Zealand) Limited	Transport	TRAN-S8 Design requirements for loading spaces and vehicle standing spaces Loading spa	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.101	OceanaGold (New Zealand) Limited	Transport	TRAN-S9 Accessible parking spaces Where parking spaces are provided on site: any on-si	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.102	OceanaGold (New Zealand) Limited	Transport	TRAN-S10 Design requirements for on-site vehicle parking spaces Where parking spaces ar	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.103	OceanaGold (New Zealand) Limited	Transport	TRAN-S10 Design requirements for on-site vehicle parking spaces Where parking spaces ar	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.104	OceanaGold (New Zealand) Limited	Transport	TRAN-S11 Surface of parking and loading areas The surface of all parking and loading a	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.105	OceanaGold (New Zealand) Limited	Transport	TRAN-S12 On-site cycle parking All developments, excluding residential units and prima	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.106	OceanaGold (New Zealand) Limited	Transport	TRAN-S13 Width and number of vehicle crossings onto roads Every lot with direct vehicl	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.107	OceanaGold (New Zealand) Limited	Transport	TRAN-S14 Formation and sealing of vehicle crossings All vehicle crossings onto a seale	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.108	OceanaGold (New Zealand) Limited	Transport	TRAN-S15 Distance between vehicle crossings and road intersections the distance betwee	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.

295.109	OceanaGold (New Zealand) Limited	Transport	TRAN-S16 Sight distances from vehicle crossings Any vehicle crossing onto a road other	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.110	OceanaGold (New Zealand) Limited	Transport	TRAN-S17 Vehicle crossings and railway crossings Any new vehicle crossing must be loca	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.111	OceanaGold (New Zealand) Limited	Transport	TRAN-S18 Classification of roads All zones National, regional and arterial roads mus	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.112	OceanaGold (New Zealand) Limited	Transport	TRAN-S19 Design of roads All zones Roads must be designed and constructed in accorda	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.113	OceanaGold (New Zealand) Limited	Transport	TRAN-S20 Pedestrian walkways, cycleways and shared paths on public land other than roads	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.114	OceanaGold (New Zealand) Limited	Transport	Table 6 – High trip generator thresholds	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.115	OceanaGold (New Zealand) Limited	Transport	Table 7 – Minimum legal widths and formation requirements for private ways/access lots	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.116	OceanaGold (New Zealand) Limited	Transport	Table 8 – Minimum loading space requirements for non-residential activities	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.117	OceanaGold (New Zealand) Limited	Transport	Table 9 – Maximum number of vehicle crossings	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.

295.118	OceanaGold (New Zealand) Limited	Transport	Table 10 – Vehicle crossing widths	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.119	OceanaGold (New Zealand) Limited	Transport	Table 11 – Minimum distance between vehicle crossings and road intersections	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.120	OceanaGold (New Zealand) Limited	Transport	Table 12 – Minimum sight distances from vehicle crossings	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.121	OceanaGold (New Zealand) Limited	Transport	Table 13 – Minimum sight distances from vehicle crossings on to a state highway	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.122	OceanaGold (New Zealand) Limited	Transport	Table 14 – Minimum sight distances from vehicle crossings – vehicle orientated commercial activities	Oppose	Considers that the SPZMM should be treated as a standalone chapter, with transport standards inapplicable due to the site's specialised access and parking needs, which are tailored for health and safety and not suited to general District Plan standards.	Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.123	OceanaGold (New Zealand) Limited	Hazardous Substances	HAZS-O1 Hazardous facilities Recognise the benefits associated with activities involvin	Support	Supports the objective - no specific reasons given.	Seeks to retain as notified.
295.124	OceanaGold (New Zealand) Limited	Hazardous Substances	HAZS-P1 Residual risk of hazardous facilities Enable activities involving the use, stor	Support	Supports the policy - no specific reasons given.	Seeks to retain as notified.
295.125	OceanaGold (New Zealand) Limited	Hazardous Substances	HAZS-P5 Residual risk to sensitive activities and environments Manage use and developme	Support	Supports the policy - no specific reasons given.	Seeks to retain as notified.
295.126	OceanaGold (New Zealand) Limited	Hazardous Substances	HAZS-R1 Use and/or storage of hazardous substances within a hazardous facility, excluding a ma	Support	Support for hazardous substances being a permitted activity, given other legislation already regulates their use and recommends locating related rules within the SPZMM chapter to reflect the site's specific context.	Seeks to retain as notified. Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.
295.127	OceanaGold (New Zealand) Limited	Hazardous Substances	HAZS-R2 Major hazard facility All zones Activity status: Discretionary Where: DIS-1	Oppose	Considers that the definition of Major Hazard Facility could unintentionally capture essential mining activities, making them non-complying and recommends that hazardous substance use and storage should be fully provided for within the SPZMM.	Seeks to ensure that the use and storage of hazardous substances within the Macraes Mining Zone is permitted. Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone.

295.128	OceanaGold (New Zealand) Limited	Contaminated Land	CL-O1 Managing contaminated land The risks to human health and the environment from contamin	Support	Supports the objective and the approach taken by the PDP in that it does not contain rules relating to contaminated land and instead defers directly to the NES.	Seeks to retain as notified.
295.129	OceanaGold (New Zealand) Limited	Contaminated Land	CL-P1 Identification of contaminated land Identify, in conjunction with the relevant Regiona	Support	Supports the policy - no specific reasons given.	Seeks to retain as notified.
295.130	OceanaGold (New Zealand) Limited	Contaminated Land	CL-P2 Minimising risks from contaminated land Minimise the risk to people and the environme	Support	Supports the policy - no specific reasons given.	Seeks to retain as notified.
295.131	OceanaGold (New Zealand) Limited	Natural Hazards	NH-O1 Natural hazard risk The risks from natural hazards, including the effects of climate	Support	Support for the objective and notes it doesn't require full avoidance of activities in hazard areas. Considers that mining at Macraes can help reduce hazard risks, such as stabilising fault-prone areas and 'mining out' unstable areas, and questions the accuracy of the proposed Surface Fault Rupture Hazard Awareness Overlay.	Seeks to ensure that the Surface Fault Rupture Hazard Awareness Overlay is correct in its application through the SPZMM and recognition that certain activities can be beneficial in mitigating natural hazard risk by increasing stabilisation of known risk areas.
295.133	OceanaGold (New Zealand) Limited	Natural Hazards	NH-P2 Risk based approach Avoid subdivision, use and development in areas where natural	Support	Support for a risk based approach to hazard management.	Seeks to retain as notified.
295.134	OceanaGold (New Zealand) Limited	Natural Hazards	NH-P9 Surface Fault Rupture Hazard Awareness Overlay – Subdivision Require application	Oppose	The submitter questions the relevance of this policy to subdivision in the SPZMM, as such activities are unlikely to involve residential development.	Seeks to ensure that the Surface Fault Rupture Hazard Awareness Overlay is correct in its application through the SPZMM. Seeks to ensure that the SPZMM is a stand alone chapter and that subdivision for the purposes of mining activities would not be subject to this provision.
295.135	OceanaGold (New Zealand) Limited	Planning Maps	General	Amend	The submitter understands the intent of this policy, however questions how it could be applicable to subdivision activities that may be undertaken within the Macraes Mining Zone, which are unlikely to be developed for housing / residential type land use activities	Seeks to ensure that the Surface Fault Rupture Hazard Awareness Overlay is correct in its application through the Macraes Mining Zone. Seeks to ensure that the Macraes Mining Zone is a 'stand alone' chapter of the Plan, such that subdivision for the purposes of mining activities would not be subject to this provision.
295.136	OceanaGold (New Zealand) Limited	Natural Hazards	NH-P10 Surface Fault Rupture Hazard Awareness Overlay – Activities and Buildings Requir	Oppose	Considers that the policy and rule NH-R12 create uncertainty for mining activities in the area and recommends clearly excluding these provisions and ensuring all mining activities are appropriately addressed within the SPZMM.	Seeks to ensure that the Surface Fault Rupture Hazard Awareness Overlay is correct in its application through the SPZMM. Seeks to ensure that the SPZMM is a stand alone chapter in terms of the rules that apply to activities within the zone and that subdivision for the purposes of mining activities would not be subject to this provision.
295.137	OceanaGold (New Zealand) Limited	Planning Maps	General	Amend	The submitter questions the accuracy of the proposed Surface Fault Rupture Hazard Awareness Overlay within the SPZMM.	Seeks to ensure that the Surface Fault Rupture Hazard Awareness Overlay is correct in its application through the SPZMM.

295.138	OceanaGold (New Zealand) Limited	Historic Heritage	HH-O1 Protection of historic heritage The District's historic heritage is recognised, main	Amend	Considers the objective should seek to apply to areas of significant historic heritage value, rather than all historic heritage regardless of its significance or overall value.	Seeks to amend as follows: The District's historic heritage is recognised, maintained and protected in order that the significant heritage values of the District be retained.
295.139	OceanaGold (New Zealand) Limited	Historic Heritage	HH-O2 Use and adaptive re-use of historic heritage Historic Heritage Items and their herit	Amend	Support for the objective and considers it appropriate to seek to adaptively reuse and retain historic heritage item where this is practicable.	Seeks to amend as follows: Where practicable Historic Heritage Items and their heritage settings are sympathetically used, adaptively re-used and retained.
295.140	OceanaGold (New Zealand) Limited	Historic Heritage	HH-O3 Enhancement and restoration The heritage values of Historic Heritage Items are en	Amend	Supports the intent but considers that it would be more appropriate for this objective to seek to enhance or restore items where practicable, rather than possible.	Seeks to amend as follows: The heritage values of Historic Heritage Items are enhanced or restored ~~where possible~~ where practicable.
295.141	OceanaGold (New Zealand) Limited	Historic Heritage	HH-P1 Recognise historic heritage Identify Historic Heritage Items and their associated	Amend	Considers the policy is potentially misleading in that it states all items listed in Schedule 2 "warrant" protection – implying that these cannot be disturbed or altered in anyway.	Seeks to amend as follows: Identify Historic Heritage Items and their associated heritage settings throughout the Waitaki district ~~that warrant protection~~ in SCHED2 – Historic Heritage Items, and are significant in terms of one or more of the following values: ...
295.142	OceanaGold (New Zealand) Limited	Historic Heritage	HH-P2 Historic heritage scheduling Classify Historic Heritage Items and their associate	Oppose	The submitter notes that some Category A heritage items such as the Golden Point Mining Complex, are located within the SPZMM and border active mining areas and this context should be acknowledged.	Seeks to ensure that the extent of the heritage scheduling is accurate and appropriate, and does not inadvertently impact on the operation of the SPZMM.
295.143	OceanaGold (New Zealand) Limited	Historic Heritage	HH-P3 Benefits of active use, adaptive re-use, and protection of historic heritage Recogni	Support	Supports the intent of the policy and agrees that there can be social, cultural, environmental and economic benefits arising from the re-use of heritage items.	Seeks to retain as notified.
295.144	OceanaGold (New Zealand) Limited	Historic Heritage	HH-P9 Relocation of Historic Heritage Items within or beyond their heritage setting Allow	Amend	Supports the policy as a practical way to manage heritage items within the SPZMM but suggests it should also allow for relocation beyond the heritage setting where appropriate, such as moving artefacts to a museum for better preservation and public access.	Seeks to amend the policy to also allow for certain circumstances where it may be appropriate to relocate items to areas well beyond their heritage setting, where they may be able to be better preserved for longer, or obtain greater education / community benefits from doing so.
295.145	OceanaGold (New Zealand) Limited	Historic Heritage	HH-P10 Demolition or destruction of Category B Historic Heritage Items Only allow the d	Amend	Suuports the intent but recommends allowing consideration of positive effects when assessing proposals involving demolition of Category B features, to ensure balanced decision-making in line with the RMA.	Seeks to amend the policy to also allow for an appropriate consideration of the positive effects of the activity to be considered alongside the adverse effects of affecting such heritage items.
295.146	OceanaGold (New Zealand) Limited	Historic Heritage	HH-P11 Demolition or destruction of Category A Historic Heritage Items Avoid the demolitio	Oppose	Considers that the policy may hinder mining in the SPZMM and seeks assurance that all nearby Category A heritage items are properly assessed. The submitter also recommends maintaining a clear consenting pathway for mining activities that may affect these items.	Seeks to ensure that the Category A heritage items in and around the SPZMM have been accurately assessed and categorised. Alternatively, seeks to amend as follows:

						Avoid, remedy or mitigate the adverse effects of the demolition or destruction of a Category A Historic Heritage Item unless it can be demonstrated that it is in a state which poses a threat to life.
295.147	OceanaGold (New Zealand) Limited	Sites and Areas of Significance to Maori	SASM-P6 Culturally incompatible activities Avoid degradation of the values of wāhi tūpu	Oppose	The submitter notes that no Sites and Areas of Significance to Māori are located within the SPZMM, though one lies to the north and is concerned that the broad definition of wāhi tūpuna could lead to mining being seen as culturally incompatible, and reiterates its preference for a standalone chapter to clearly manage all mining-related provisions.	Seeks to ensure that the policy does not apply to mining activities in the SPZMM.
295.148	OceanaGold (New Zealand) Limited	Ecosystems and Indigenous Biodiversity	General	Amend	Considers that identifying SNAs is currently beyond the scope of the NPS-IB due to Section 21 of the Resource Management (Freshwater and Other Matters) Amendment Act 2024, which suspends SNA identification requirements for three years and states that any SNAs identified during this period are not considered SNAs under the NPS-IB.	Seeks for Counci to consider pausing the progression of the ECO chapter.
295.149	OceanaGold (New Zealand) Limited	Ecosystems and Indigenous Biodiversity	General	Amend	Considers the term “biosecurity pests” should be replaced with “pests and predators,” as the term is undefined and may imply only newly arrived pests, whereas established predators like possums and mice are major contributors to biodiversity loss. It also seeks clarification that predator control can be a primary offsetting measure, not just additional, and suggests removing the term “long-term” due to uncertainty around project timeframes.	Seeks to delete reference to “biosecurity pests” and replace with “pests and predators”.
295.150	OceanaGold (New Zealand) Limited	Ecosystems and Indigenous Biodiversity	The future impacts of climate change also present a threat to biodiversity. An increase in extreme w	Amend	Considers the term “biosecurity pests” should be replaced with “pests and predators,” as the term is undefined and may imply only newly arrived pests, whereas established predators like possums and mice are major contributors to biodiversity loss. It also seeks clarification that predator control can be a primary offsetting measure, not just additional, and suggests removing the term “long-term” due to uncertainty around project timeframes.	Seeks to amend as follows: Actions such as predator and pest control can provide benefits to indigenous vegetation and fauna, and can occur as part of biodiversity offsetting ~~where the measures are additional to~~ alongside other protection ~~and~~ or actions already being undertaken, provided they are sustained ~~in the long-term~~, and the benefits are measurable. Among other things, biodiversity offsets should seek to provide no net loss and a net gain for biodiversity.
295.151	OceanaGold (New Zealand) Limited	Ecosystems and Indigenous Biodiversity	ECO-O1 Halt the decline of indigenous biodiversity Halt the decline of the Waitaki Dist	Amend	Considers that the language used is inconsistent with the NPSIB, Clause 1.7 and that the NPSIB enables certain activities to manage their effects on SNAs particularly where they have a functional need to co-locate in such areas and this should be recognised in the objective.	Seeks to amend as follows: ~~Halt the decline of~~ Maintain the Waitaki District’s indigenous biodiversity so there is at least no overall loss, including between.... Also seeks to add the following clause: 4. Managing adverse effects of new subdivision, use, or development for specified infrastructure, mineral or aggregate extraction that provides significant national public benefit, or the operation or expansion of any existing lawfully established coal mine that has a functional need or operational need to be in that particular location and there are no practicable alternative locations that activity.

295.152	OceanaGold (New Zealand) Limited	Ecosystems and Indigenous Biodiversity	ECO-O2 Identify and protect Significant Natural Areas Areas identified as Significant Natu	Oppose	Considers the objective may conflict with enabling access to mineral resources in the SPZMM and also notes that under the RMA Amendment Act 2024, councils are not required to identify new SNAs for three years, creating uncertainty around advancing mapped areas in the Proposed Plan.	Seeks to delete the provision.
295.153	OceanaGold (New Zealand) Limited	Ecosystems and Indigenous Biodiversity	ECO-O3 Restore or enhance Significant Natural Areas Significant Natural Areas are resto	Support	Support - considers the objective to be consistent with the NPSIB.	Seeks to retain as notified.
295.154	OceanaGold (New Zealand) Limited	Ecosystems and Indigenous Biodiversity	ECO-P1 Evaluation of Significant Natural Areas Identify the ecological significance of	Oppose	Considers it inappropriate that clause (5) requires all identified SNAs to be scheduled through a future plan change as areas identified through resource consent may not be suitable for district-wide SNA status without broader assessment.	Seeks to delete the provision.
295.155	OceanaGold (New Zealand) Limited	Ecosystems and Indigenous Biodiversity	ECO-P2 Protection of Significant Natural Areas Except as provided for in clause 2 belo	Oppose	Considers the drafting unclear and recommends separating the policy into separate provisions. Also notes that the term “mineral extraction that provides significant national public benefit” is undefined and is expected to change with upcoming NPSIB amendments. The submitter also highlights that the RMA Amendment Act 2024 suspends the identification of new SNAs for three years, raising uncertainty about advancing mapped areas. Considers that given the Macraes Mining Zone’s recognised national and regional significance, it is appropriate to include specific provisions for managing SNAs within the zone through a standalone chapter with tailored biodiversity and SNA rules.	Seeks to delete the provision.
295.156	OceanaGold (New Zealand) Limited	Ecosystems and Indigenous Biodiversity	General	Oppose	Considers the drafting unclear and recommends separating the policy into separate provisions. Also notes that the term “mineral extraction that provides significant national public benefit” is undefined and is expected to change with upcoming NPSIB amendments. The submitter also highlights that the RMA Amendment Act 2024 suspends the identification of new SNAs for three years, raising uncertainty about advancing mapped areas. Considers that given the Macraes Mining Zone’s recognised national and regional significance, it is appropriate to include specific provisions for managing SNAs within the zone through a standalone chapter with tailored biodiversity and SNA rules.	Seeks to add a new policy recognising that the SPZMM is of national significance and therefore require under clause 3.11 of the NPSIB a bespoke approach to managing the effects of mining activities on SNAs.
295.157	OceanaGold (New Zealand) Limited	Ecosystems and Indigenous Biodiversity	ECO-P3 Appropriate activities within Significant Natural Areas Enable limited - earthw	Oppose	Considers that clause (5) suggests only limited activities are appropriate within SNAs and that clause 3.11 of the NPSIB allows for activities with a functional need to be located in SNAs, and that these should be assessed using the effects management hierarchy.	Seeks to delete the provision.
295.158	OceanaGold (New Zealand) Limited	Ecosystems and Indigenous Biodiversity	ECO-P4 Supporting the maintenance, restoration and enhancement of indigenous biodiversity	Support	Considers that the “appropriate thresholds” for vegetation clearance in ECO-P4(8) seem arbitrary and may not align with the NPSIB. It understands these refer to rule limits but recommends clearer justification and consistency with national policy.	Seeks to ensure that the thresholds set out in the rules and standards have been evidentially derived.
295.159	OceanaGold (New	Ecosystems and Indigenous Biodiversity	ECO-P5 National priorities for protection Recognise the following national priorities f	Support	Considers it is unclear how the policy will be implemented at a district level.	Seeks to delete the provision.

	Zealand) Limited					
295.160	OceanaGold (New Zealand) Limited	Ecosystems and Indigenous Biodiversity	ECO-P9 Precautionary approach Adopt a precautionary approach to considering the adverse	Oppose	The submitter acknowledges the intent of this policy and its alignment with NPSIB Policy 3, but considers it unnecessary to restate this separately, as clauses 3.10 and 3.11 already provide the appropriate framework in the Proposed Plan.	Seeks to delete the provision.
295.161	OceanaGold (New Zealand) Limited	Ecosystems and Indigenous Biodiversity	ECO-P10 Provision for maintenance of improved pasture for primary production where it may affe	Support	Considers the poilcy appropriate.	Seeks to retain as notified.
295.162	OceanaGold (New Zealand) Limited	Ecosystems and Indigenous Biodiversity	ECO-P11 Highly mobile fauna In relation to habitats of highly mobile fauna: identify a	Oppose	The submitter acknowledges the policy reflects the NPSIB, but questions its value since the PDP provisions don't clearly show how it will be implemented.	Seeks to delete the provision.
295.163	OceanaGold (New Zealand) Limited	Ecosystems and Indigenous Biodiversity	ECO-P14 Managing indigenous vegetation outside Significant Natural Areas Avoid signific	Oppose	Considers the policy goes beyond what Clause 3.16 of the NPSIB requires and doesn't allow for appropriate offsetting or compensation. Also considers that it sets an unnecessarily high bar by requiring effects to be avoided rather than managed.	Seeks to delete clauses (1)–(5) of the policy and enable access to offsetting and compensation measures to manage effects on areas outside of identified SNAs. Also seeks to replace the requirement to "avoid" with "manage".
295.164	OceanaGold (New Zealand) Limited	Ecosystems and Indigenous Biodiversity	ECO-P15 Inappropriate activities within or near to Significant Natural Areas Prohibit t	Amend	Considers that non-indigenous planting in SNAs should be provided for where it supports biodiversity, such as shelter belts or species that attract and support native fauna.	Seeks to amend the policy to acknowledge that in limited circumstances non-indigenous planting may be appropriate.
295.165	OceanaGold (New Zealand) Limited	Ecosystems and Indigenous Biodiversity	ECO-R1 Indigenous vegetation clearance outside of a Significant Natural Area listed in SCHED6	Support	Supports a rule allowing existing activities to clear indigenous vegetation but questions its necessity if clearance is already consented and also raises concerns about the legality and clarity of rules like PER-8, and recommends keeping "or" between rules to avoid contradictions.	Seeks to ensure that the rules are necessary, legal and do not contradict one another or existing approvals.
295.166	OceanaGold (New Zealand) Limited	Ecosystems and Indigenous Biodiversity	ECO-R2 Indigenous vegetation clearance within a Significant Natural Area listed in SCHED6 – Si	Oppose	Considers that the list in PER-1 implies that any other activity which may already hold appropriate authorisations to clear vegetation within an SNA is no longer deemed to be approved and it is unclear how this would affect existing use rights.	Seeks to delete the rule or make it consistent with ECO-R1 in terms of existing activities and existing approvals. Also seeks to ensure existing use rights are appropriately provided for in the development of the ECO chapter.
295.167	OceanaGold (New Zealand) Limited	Ecosystems and Indigenous Biodiversity	ECO-R3 Earthworks within a Significant Natural Area listed in SCHED6 – Significant Natural Are	Oppose	Considers that the list implies that activities that have appropriate authorisations to clear vegetation within an SNA is no longer deemed to be approved and it is unclear how this would affect existing use rights.	Seeks to delete the rule or otherwise ensure existing use rights are appropriately provided for in the ECO chapter.
295.168	OceanaGold (New Zealand) Limited	Ecosystems and Indigenous Biodiversity	ECO-R4 Exotic commercial forestry, agricultural intensification, quarrying activity or mining	Oppose	Considers the rule creates uncertainty and potential conflict with the SPZMM enabling intent as there are several SNAs and overlays within the SPZMM which may trigger additional regulations and require resource consent for activities that are otherwise permitted. The submitter recommends careful consideration of these overlays and highlights that ECO-R4 does not require consideration of the positive effects of mining.	Seeks to remove SNAs within the SPZMM, or alternatively, ensure that the SPZMM is treated as a 'stand alone' chapter and includes provisions for the management of indigenous biodiversity while striking a balance with the presumption that it primarily supports exploration and mining activities in the area. If the rule is retained, seeks to ensure that the matters of discretion include consideration of the positive effects arising from allowing the development to proceed.

295.169	OceanaGold (New Zealand) Limited	Ecosystems and Indigenous Biodiversity	ECO-R5 Commercial forestry, agricultural intensification, quarrying activity or mining activit	Oppose	Considers that the rule conflicts with the purpose of the SPZMM and Clause 3.11 of the NPSIB, which allows mining in SNAs if effects are properly managed. Also considers it inappropriate to classify mining as non-complying in a zone specifically designed to enable it.	Seeks to delete the provision.
295.170	OceanaGold (New Zealand) Limited	Ecosystems and Indigenous Biodiversity	ECO-R6 Planting non-indigenous vegetation within a Significant Natural Area listed in SCHED6 –	Oppose	Considers that non-indigenous planting within SNAs should not be prohibited, as it may support ecological outcomes such as stabilising areas affected by development or attracting native species. Considers that a blanket ban could limit positive biodiversity results.	Seeks to delete the provision.
295.171	OceanaGold (New Zealand) Limited	Ecosystems and Indigenous Biodiversity	ECO-R7 Planting species that result in wilding conifers within a Significant Natural Area, or	Oppose	Considers that non-indigenous planting within SNAs should not be prohibited, as it may support ecological outcomes such as stabilising areas affected by development or attracting native species. Considers that a blanket ban could limit positive biodiversity results.	Seeks to delete the provision.
295.172	OceanaGold (New Zealand) Limited	Ecosystems and Indigenous Biodiversity	ECO-R8 Intensive indoor primary production and intensive outdoor primary production within a Sign	Oppose	Considers that non-indigenous planting within SNAs should not be prohibited, as it may support ecological outcomes such as stabilising areas affected by development or attracting native species. Considers that a blanket ban could limit positive biodiversity results.	Seeks to delete the provision.
295.173	OceanaGold (New Zealand) Limited	Natural Character	NATC-O1 Preserving and protecting the natural character of riparian margins The natural	Amend	Considers the objective overly restrictive, effectively prohibiting development near riparian margins. This conflicts with section 6 of the RMA and the NPS-FM, which allow for offsetting or compensation under the effects management hierarchy.	Seeks to amend as follows: <u>Natural character values associated with riparian margins are protected from inappropriate subdivision, use and development.</u>
295.174	OceanaGold (New Zealand) Limited	Natural Character	NATC-O2 Restoring and enhancing degraded natural character The natural character of Waitak	Amend	Considers that requiring restoration of all riparian margins is inconsistent with section 6 of the RMA and the NPS-FM. Considers an objective is needed to support NATC-P2, which recognises that some activities may need to be located within stream environments.	Seeks to amend as follows: ~~The natural character of Waitaki District's riparian margins is restored or enhanced, where they exist in a degraded state.~~<u>Ensure adverse effects on riparian margins are appropriately managed, and where opportunities are available restore or enhance the values of these areas.</u>
295.175	OceanaGold (New Zealand) Limited	Natural Character	NATC-P1 Enabling appropriate buildings, structures, earthworks, vegetation clearance and plant	Oppose	Considers that the policy does not give effect to the NPSFM which allows stream and riparian margin disturbance associated with certain specified activities which have a functional need to locate within them (such as infrastructure or mining activities).	Seeks to link the policy to NATC-P2 which appropriately recognises the NPSFM and functional need requirements for certain activities to locate within stream and riparian margins.
295.176	OceanaGold (New Zealand) Limited	Natural Character	NATC-P3 Maintain the natural character of riparian margins Maintain the following, when	Oppose	Considers that the policy is akin to identification of outstanding natural features and that such an assessment is not appropriate for all areas of riparian margin.	Seeks to delete the provision.
295.177	OceanaGold (New Zealand) Limited	Natural Character	NATC-R1 Buildings and structures within a riparian margin All zones Activity status:	Oppose	The submitter notes this rule applies to all zones, including the SPZMM, which may conflict with provisions enabling mining. Considers the SPZMM should be a stand alone chapter to avoid contradictions and protect the intent of the zone.	Seeks to ensure that the provision does not apply to mining activities in the SPZMM.
295.178	OceanaGold (New	Natural Character	NATC-R2 Vegetation clearance within a riparian	Oppose	The submitter notes this rule applies to all zones, including the SPZMM, which may conflict with provisions enabling mining.	Seeks to ensure that the provisions does not apply to mining activities in the SPZMM.

	Zealand) Limited		margin All zones Activity status: Perm		Considers the SPZMM should be a stand alone chapter to avoid contradictions and protect the intent of the zone.	
295.179	OceanaGold (New Zealand) Limited	Natural Character	NATC-R3 Planting indigenous vegetation within riparian margins All zones Activity sta	Oppose	The submitter notes this rule applies to all zones, including the SPZMM, which may conflict with provisions enabling mining. Considers the SPZMM should be a stand alone chapter to avoid contradictions and protect the intent of the zone.	Seeks to ensure that the provision does not apply to mining activities in the SPZMM.
295.180	OceanaGold (New Zealand) Limited	Natural Character	NATC-R4 Planting exotic vegetation within riparian margins All zones Activity status:	Oppose	The submitter notes this rule applies to all zones, including the SPZMM, which may conflict with provisions enabling mining. Considers the SPZMM should be a stand alone chapter to avoid contradictions and protect the intent of the zone.	Seeks to ensure that the provision does not apply to mining activities in the SPZMM.
295.181	OceanaGold (New Zealand) Limited	Natural Character	NATC-R5 Planting of any pest, pest agent, or organism of interest identified in a Regional Pes	Oppose	The submitter notes this rule applies to all zones, including the SPZMM, which may conflict with provisions enabling mining. Considers the SPZMM should be a stand alone chapter to avoid contradictions and protect the intent of the zone.	Seeks to ensure that the provision does not apply to mining activities in the SPZMM.
295.182	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-O1 Outstanding Natural Features and Landscapes Outstanding Natural Features and Landsc	Support	Supports the objective as it is consistent with section 6 of the RMA.	Seeks to retain as notified.
295.183	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-O2 Significant Natural Features and Rural Scenic Landscapes The values of Significant	Support	Supports the objective - no specific reasons given.	Seeks to retain as notified.
295.184	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-O4 Restoration and enhancement of landscapes Outstanding Natural Features and Landscap	Amend	Considers it impractical to require restoration in all cases, especially where areas are already identified as ONFL or where rural landscapes change through productive use.	Seeks to amend as follows: Outstanding Natural Features and Landscapes, Significant Natural Features, and Rural Scenic Landscapes are restored and enhanced, <u>where practicable and</u> where their values have been lost or degraded.
295.185	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-P1 Identification of Outstanding Natural Features and Landscapes In relation to the	Oppose	Parts of the SPZMM are identified as ONL and Rural Scenic Landscape, despite existing mine workings in these areas. The submitter considers that landscape assessments should take into account existing modifications and consents, and that further analysis is needed to justify applying landscape overlays within a zone specifically designed for mining.	Seeks to remove the ONL and Rural Scenic Landscape overlays from within the SPZMM and from land adjacent to existing mining activities.
295.186	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-P2 Identification of Significant Natural Features and Rural Scenic Landscapes In re	Oppose	Parts of the SPZMM are identified as ONL and Rural Scenic Landscape, despite existing mine workings in these areas. The submitter considers that landscape assessments should take into account existing modifications and consents, and that further analysis is needed to justify applying landscape overlays within a zone specifically designed for mining.	Seeks to remove the ONL and Rural Scenic Landscape overlays from within the SPZMM and from land adjacent to existing mining activities.
295.187	OceanaGold (New Zealand) Limited	Planning Maps	General	Oppose	Parts of the SPZMM are identified as ONL and Rural Scenic Landscape, despite existing mine workings in these areas. The submitter considers that landscape assessments should take into account existing modifications and consents, and that further	Seeks to remove the ONL and Rural Scenic Landscape overlays from within the SPZMM and from land adjacent to existing mining activities.

					analysis is needed to justify applying landscape overlays within a zone specifically designed for mining.	
295.188	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-P3 Recognise the importance of protecting natural features and landscapes Recognise:	Oppose	Parts of the SPZMM are identified as ONL and Rural Scenic Landscape. The submitter considers these conflict with the zone's enabling purpose, especially near active mining areas and that it will be difficult to reconcile the 'national importance' and 'local and regional importance' of these landscape values vs the 'national importance of the mining activities' in this area.	Seeks to remove the ONL and Rural Scenic Landscape overlays from within the SPZMM and from land adjacent to existing mining activities.
295.190	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-P4 Avoiding inappropriate activities on or within Outstanding Natural Features or Landscap	Oppose	The submitter does not support the ONL status that has been applied to part of the SPZMM.	Seeks to remove the ONL from within the SPZMM and from land adjacent to existing mining activities.
295.192	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-P5 Avoiding inappropriate activities on or within Significant Natural Features and Rural S	Oppose	Considers that given the enabling intent of the SPZMM, it should not be constrained by a landscape overlay and that if the overlay remains, there must be a clear pathway for mining and primary production activities. Considers that avoidance policies for non-outstanding landscapes are inappropriate, especially as open cast mining can temporarily affect amenity values, with mining activities seeking to rehabilitate the landform and landscape with opportunities to manage the overall adverse effects appropriately in such areas.	Seeks to remove the Rural Scenic Landscape overlay from within the SPZMM and from land adjacent to existing mining activities.
295.193	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-P5 Avoiding inappropriate activities on or within Significant Natural Features and Rural S	Oppose	Considers that given the enabling intent of the SPZMM, it should not be constrained by a landscape overlay and that if the overlay remains, there must be a clear pathway for mining and primary production activities. Considers that avoidance policies for non-outstanding landscapes are inappropriate, especially as open cast mining can temporarily affect amenity values, with mining activities seeking to rehabilitate the landform and landscape with opportunities to manage the overall adverse effects appropriately in such areas.	Seeks to remove the Rural Scenic Landscape overlay from the SPZMM Alternatively, seeks to amend the policy as follows: <u>Provide for activities in Rural Scenic Landscapes, where they have a functional need or operational need to locate in such environments and where they appropriately manage the adverse effects on the values that overall contribute to its landscape status.</u>
295.195	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-P6 Landscape's ability to absorb change When determining a landscape's ability to abso	Amend	Considers that appropriate consideration should also be given to whether the activity has a functional or operational need to locate within this particular landscape.	Seeks to include reference to whether the activity has a functional or operational need to locate within the particular landscape identified.
295.196	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-P7 Earthworks within identified natural features and landscapes When determining if ea	Support	Supports recognition of the functional or operational needs for earthworks to occur where mineral resources are present.	Seeks to retain as notified.
295.197	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-P8 Buildings and structures on or within identified natural features and landscapes Wh	Support	Supports the policy - no specific reasons given.	Seeks to retain as notified.
295.198	OceanaGold (New	Natural Features and Landscapes	NFL-R1 Buildings and structures (excluding fences)	Oppose	Considers that as an overarching matter, all rules relating to the SPZMM should be set out within the 'stand alone' chapter for this area.	Seeks to remove ONL and RSL from the SPZMM and from land adjacent to existing mining activities such that the rules in the

	Zealand) Limited		on or within Outstanding Natural Features o			Natural Features and Landscape chapter of the Plan do not apply to the zone.
295.199	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-R2 Buildings and structures (excluding fences) on or within Significant Natural Features o	Oppose	Considers that as an overarching matter, all rules relating to the SPZMM should be set out within the 'stand alone' chapter for this area.	Seeks to remove ONL and RSL from the SPZMM and from land adjacent to existing mining activities such that the rules in the Natural Features and Landscape chapter of the Plan do not apply to the zone.
295.200	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-R3 Permanent fencing on or within Outstanding Natural Features or Landscapes, Significant	Oppose	Considers that as an overarching matter, all rules relating to the SPZMM should be set out within the 'stand alone' chapter for this area.	Seeks to remove ONL and RSL from the SPZMM and from land adjacent to existing mining activities such that the rules in the Natural Features and Landscape chapter of the Plan do not apply to the zone.
295.201	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-R4 Earthworks on or within Outstanding Natural Features or Landscapes or Significant Natur	Oppose	Considers that as an overarching matter, all rules relating to the SPZMM should be set out within the 'stand alone' chapter for this area.	Seeks to remove ONL and RSL from the SPZMM and from land adjacent to existing mining activities such that the rules in the Natural Features and Landscape chapter of the Plan do not apply to the zone.
295.202	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-R5 Primary production activities (excluding buildings, mining activities, quarrying activi	Oppose	Considers that as an overarching matter, all rules relating to the Macraes Mining Zone should be set out within the 'stand alone' chapter for this area.	Seeks to remove landscape status from the SPZMM and from land adjacent to existing mining activities such that the rules in the Natural Features and Landscape chapter of the Plan do not apply these areas.
295.203	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-R6 Amenity planting and shelterbelts on or within Outstanding Natural Features or Landscap	Oppose	Considers that as an overarching matter, all rules relating to the SPZMM should be set out within the 'stand alone' chapter for this area.	Seeks to remove ONL and RSL from the SPZMM and from land adjacent to existing mining activities such that the rules in the Natural Features and Landscape chapter of the Plan do not apply to the zone.
295.204	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-R7 Outdoor recreational activities (excluding buildings) on or within Outstanding Natural	Oppose	Considers that as an overarching matter, all rules relating to the SPZMM should be set out within the 'stand alone' chapter for this area.	Seeks to remove ONL and RSL from the SPZMM and from land adjacent to existing mining activities such that the rules in the Natural Features and Landscape chapter of the Plan do not apply to the zone.
295.205	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-R8 Landscape restoration activities on or within Outstanding Natural Features or Landscape	Oppose	Considers that as an overarching matter, all rules relating to the SPZMM should be set out within the 'stand alone' chapter for this area.	Seeks to remove ONL and RSL from the SPZMM and from land adjacent to existing mining activities such that the rules in the Natural Features and Landscape chapter of the Plan do not apply to the zone.
295.206	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-R9 Flood protection structures and flood protection works on or within Outstanding Natural	Oppose	Considers that as an overarching matter, all rules relating to the SPZMM should be set out within the 'stand alone' chapter for this area.	Seeks to remove ONL and RSL from the SPZMM and from land adjacent to existing mining activities such that the rules in the Natural Features and Landscape chapter of the Plan do not apply to the zone.
295.207	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-R10 Plantation Forestry within or on Significant Natural Features or Rural Scenic Landscap	Oppose	Considers that as an overarching matter, all rules relating to the SPZMM should be set out within the 'stand alone' chapter for this area.	Seeks to remove ONL and RSL from the SPZMM and from land adjacent to existing mining activities such that the rules in the Natural Features and Landscape chapter of the Plan do not apply to the zone.
295.208	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-R11 Mining activities and/or quarrying activities (excluding existing farm quarries) withi	Oppose	Considers that as an overarching matter, all rules relating to the SPZMM should be set out within the 'stand alone' chapter for this area.	Seeks to remove ONL and RSL from the SPZMM and from land adjacent to existing mining activities such that the rules in the Natural Features and Landscape chapter of the Plan do not apply to the zone.

295.209	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-R12 Mining activities and/or quarrying activities (excluding existing farm quarries) on or	Oppose	Considers that as an overarching matter, all rules relating to the SPZMM should be set out within the 'stand alone' chapter for this area.	Seeks to remove ONL and RSL from the SPZMM and from land adjacent to existing mining activities such that the rules in the Natural Features and Landscape chapter of the Plan do not apply to the zone.
295.210	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-R13 Intensive indoor primary production and intensive outdoor primary production within or	Oppose	Considers that as an overarching matter, all rules relating to the SPZMM should be set out within the 'stand alone' chapter for this area.	Seeks to remove ONL and RSL from the SPZMM and from land adjacent to existing mining activities such that the rules in the Natural Features and Landscape chapter of the Plan do not apply to the zone.
295.211	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-R14 Plantation Forestry on or within Outstanding Natural Features or Landscapes All	Oppose	Considers that as an overarching matter, all rules relating to the SPZMM should be set out within the 'stand alone' chapter for this area.	Seeks to remove ONL and RSL from the SPZMM and from land adjacent to existing mining activities such that the rules in the Natural Features and Landscape chapter of the Plan do not apply to the zone.
295.212	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-R15 Planting species that can result in wilding conifers on or within Outstanding Natural	Oppose	Considers that as an overarching matter, all rules relating to the SPZMM should be set out within the 'stand alone' chapter for this area.	Seeks to remove ONL and RSL from the SPZMM and from land adjacent to existing mining activities such that the rules in the Natural Features and Landscape chapter of the Plan do not apply to the zone.
295.213	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-R16 Intensive indoor primary production and intensive outdoor primary production on or wit	Oppose	Considers that as an overarching matter, all rules relating to the SPZMM should be set out within the 'stand alone' chapter for this area.	Seeks to remove ONL and RSL from the SPZMM and from land adjacent to existing mining activities such that the rules in the Natural Features and Landscape chapter of the Plan do not apply to the zone.
295.214	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-R2 Buildings and structures (excluding fences) on or within Significant Natural Features o	Support	Support for the permitted activity rule for activities within Rural Scenic landscapes. Considers that as an overarching matter, all rules relating to the SPZMM should be set out within the 'stand alone' chapter for this area.	Seeks to retain as notified.
295.215	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-R3 Permanent fencing on or within Outstanding Natural Features or Landscapes, Significant	Support	Support for the permitted activity rule for activities within Rural Scenic landscapes. Considers that as an overarching matter, all rules relating to the SPZMM should be set out within the 'stand alone' chapter for this area.	Seeks to retain as notified.
295.216	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-R11 Mining activities and/or quarrying activities (excluding existing farm quarries) withi	Oppose	Considers that given the enabling intent of the SPZMM, it should not be constrained by a landscape overlay and that if the overlay remains, there must be a clear pathway for mining and primary production activities. Considers that a fully discretionary status is too restrictive for a zone that anticipates mining.	Seeks to delete the rule, or exempt mining / quarrying activities in the SPZMM. Alternatively, seeks make the rule a restricted discretionary activity status if within the SPZMM.
295.217	OceanaGold (New Zealand) Limited	Natural Features and Landscapes	NFL-R12 Mining activities and/or quarrying activities (excluding existing farm quarries) on or	Oppose	A small section of ONL area borders the Coronation Mining Area within the SPZMM and the submitter considers this status inappropriate for a zone intended for mining. Considers that if the ONL overlay remains, mining should not be a non-complying activity, as this conflicts with the zone's purpose.	Seeks to delete the rule, or exempt mining / quarrying activities in the SPZMM. Alternatively, seeks make the rule a restricted discretionary activity status if within the SPZMM.
295.218	OceanaGold (New Zealand) Limited	Earthworks	General	Oppose	Considers that all activities within the SPZMM should be managed in a standalone chapter, separate from the General Earthworks provisions. Considers that the current drafting creates uncertainty around which rules apply to exploration and prospecting, and it is inappropriate for these activities to default to the Earthworks chapter.	Seeks to ensure that the chapter does not apply to any activities in the SPZMM.

295.219	OceanaGold (New Zealand) Limited	Earthworks	General	Oppose	Considers that all activities within the SPZMM should be managed in a standalone chapter, separate from the Earthworks (Quarrying) provisions.	Seeks to ensure that the chapter does not apply to any activities in the SPZMM.
295.220	OceanaGold (New Zealand) Limited	Earthworks	General	Oppose	Considers that all activities within the SPZMM should be managed in a standalone chapter, separate from the Earthworks (Mining) provisions.	Seeks to ensure that the chapter does not apply to any activities in the SPZMM.
295.221	OceanaGold (New Zealand) Limited	Light	General	Oppose	Considers that all activities within the SPZMM should be managed in a standalone chapter, separate from the LIGHT provisions.	Seeks to ensure that the chapter does not apply to any activities in the SPZMM.
295.222	OceanaGold (New Zealand) Limited	Noise	General	Oppose	Considers that all activities within the SPZMM should be managed in a standalone chapter, separate from the NOISE provisions.	Seeks to ensure that the chapter does not apply to any activities in the SPZMM.
295.223	OceanaGold (New Zealand) Limited	Noise	NOISE-R5 Vibration and blasting effects in the Special Purpose Zone - Macraes Mining Sp	Amend	Supports the rule but seeks that it is situated in the SPZMM as a 'stand alone' chapter of the plan with all relevant provisions set out within it.	Seeks to retain the rule, but relocate it to sit within the SPZMM chapter.
295.224	OceanaGold (New Zealand) Limited	Noise	NOISE-S1 Maximum noise limits Maximum noise level at or within the boun	Amend	Supports appropriate noise standards but is concerned about enforcement in the Potential Mining Area, where rural noise limits may conflict with nearby operational areas. Considers that future mining in these areas should be reflected in the zoning, and setbacks for sensitive activities could help manage noise effects. Also considers that applying noise rules across multiple land parcels within the mining zone may create arbitrary and inappropriate restrictions.	Seeks to retain the noise standard for the Existing Mining Area subject to ensuring the "boundary of and site" is not applied arbitrarily to land parcels. Seeks to ensure any noise standards set for the SPZMM are appropriate and reflect the nature of existing and potential mining activities to be undertaken in this zone. Seeks to relocate the noise rules that apply to SPZMM to the SPZMM chapter. Seeks to ensure new sensitive activities are required to set back an appropriate distance from the SPZMM to protect existing and potential mining activities from reverse sensitivity.
295.225	OceanaGold (New Zealand) Limited	Signs	General	Oppose	Consider it unclear whether this chapter applies to the SPZMM, as it contains general limits that don't suit an active mine site. Considers all activities in the zone should be managed in a standalone chapter, with this chapter's provisions excluded.	Seeks to ensure that the chapter does not apply to any activities in the SPZMM.
295.226	OceanaGold (New Zealand) Limited	General Rural Zone	General	Oppose	The submitter understands that some General Rural Zone standards may apply to the SPZMM. Considers that all standards for the SPZMM should be contained within its own chapter to provide a clear, standalone framework for managing activities and land uses.	Seeks to ensure that the chapter does not apply to any activities in the SPZMM and that SPZMM chapter comprehensively addresses all existing and potential activities within those zone provisions (including non-mining and mining activities).
295.227	OceanaGold (New	General Rural Zone	General	Support	General support for the General Rural Zone objectives and policies as they relate to mining outside the SPZMM. Considers	Seeks to retain the objectives and policies of the General Rural Zone and include new objectives and policies that ensure new

	Zealand) Limited				that the current provisions don't adequately protect activities within the mining zone from reverse sensitivity and that introducing setbacks for sensitive activities near the zone boundaries could help manage future conflicts.	sensitive activities are required to set back an appropriate distance from the SPZMM to protect existing and potential mining activities from reverse sensitivity.
295.228	OceanaGold (New Zealand) Limited	General Rural Zone	General	Support	General support for the General Rural Zone objectives and policies as they relate to mining outside the SPZMM. Considers that the current provisions don't adequately protect activities within the mining zone from reverse sensitivity and that introducing setbacks for sensitive activities near the zone boundaries could help manage future conflicts.	Seeks to retain the objectives and policies of the General Rural Zone and include new objectives and policies that ensure new sensitive activities are required to set back an appropriate distance from the SPZMM to protect existing and potential mining activities from reverse sensitivity.
295.229	OceanaGold (New Zealand) Limited	General Rural Zone	GRUZ-R2 Primary production (excluding carbon forestry otherwise provided for in GRUZ-R18, mini	Oppose	Considers it unclear what the resulting activity status is for mining and quarrying activities in the General Rural Zone as a result of this rule. Considers it is likely that it defaults to the GRUZ-R23 discretionary rule. Considers that as mining is defined as primary production it should have restricted discretionary status in the General Rural Zone, where such activities are expected.	Seeks to clarify what activity status mining and quarrying activities have in the General Rural Zone. Seeks that there should be a consenting pathway for mining activities on highly productive land.
295.230	OceanaGold (New Zealand) Limited	General Rural Zone	GRUZ-R23 Any other activity not provided for as a permitted, restricted discretionary, non-com	Oppose	Considers that all primary production activities, including mining, should be provided for, with restricted discretionary status appropriate for new developments.	Seeks to provide for mining activities as a restricted discretionary activity in GRUZ and provide a consenting pathway for mining activities on highly productive land.
295.231	OceanaGold (New Zealand) Limited	Planning Maps	General	Amend	Considers that the SPZMM should include all of the following land in the vicinity of the Hyde-Macraes Shear Zone: - Land that is owned by OceanaGold; - Land that is covered by minerals permits issued by the government and held by OceanaGold; - Land that is covered by resource consents held by OceanaGold for mining or mining related activities; and - Land over which OceanaGold holds the rights to minerals. Annexure 1 to this submission indicatively illustrates the extent of such land [refer to original submission].	Seeks to retain the maps relating to the SPZMM subject to amending the boundary of the zone to that indicatively illustrated in Annexure 1 to this submission [refer to original submission].
295.232	OceanaGold (New Zealand) Limited	Planning Maps	General	Oppose	Opposes the ONL overlay across part of the SPZMM as it is a highly modified mining environment and it is difficult to determine how ONL status has been derived at in this location.	Seeks to remove the ONL status within the SPZMM
295.233	OceanaGold (New Zealand) Limited	Planning Maps	General	Oppose	Opposes the Rural Scenic Landscape overlay across parts of the SPZMM as this conflicts with the intended enabling purpose of the zone.	Seeks to remove the RSL overlay from the SPZMM
295.234	OceanaGold (New Zealand) Limited	Planning Maps	General	Oppose	Considers natural hazard overlays may impose unnecessary constraints, as risks are already well understood and managed in an operational mining environment and that the associated rules could create unnecssary limitations on current activities.	Seeks to remove the natural hazard overlays from within the SPZMM.

295.235	OceanaGold (New Zealand) Limited	Planning Maps	General	Oppose	Some SNAs within the SPZMM were identified through OceanaGold's own consent-related studies. These areas are in a highly modified environment, and the submitter considers it inappropriate to designate them for indigenous biodiversity protection, as this conflicts with the zone's intent.	Seeks to remove SNA and Skink Habitat Management Area overlays from within the SPZMM.
295.236	OceanaGold (New Zealand) Limited	Planning Maps	General	Oppose	The submitter notes the plan includes a wide range of heritage items, including Category A sites within the SPZMM and considers this high level of protection must be based on accurate identification and genuine heritage value, as it may conflict with the zone's purpose. Considers that as many of these sites reflect historic mining, there is an opportunity to recognise heritage while enabling modern mining to continue the legacy of Otago's pioneers.	Seeks to ensure heritage items and setting areas that are not properly categorised do not inadvertently impact on the ability to operate or develop the mine and ancillary activities within the SPZMM.
296.1	Gavin Simpson	Strategic Direction	General	Support	In general support of Strategic Direction chapter, in particular the historical and cultural identity and values, and the rural areas. [Refer to original submission for full reasons]	Retain as notified
296.2	Gavin Simpson	Definitions	Agricultural intensification in relation to the Ecosystems and Indigenous Biodiversity c	Oppose	[Refer to original submission for full reasons]	[Refer to original submission for full relief sought] Seeks to add a new definition as follows: ~~Agricultural intensification:~~ High rate irrigation: in relation to the ~~Ecosystems and Indigenous Biodiversity chapter, Natural Features and Landscapes chapter, and the~~Sites and Areas of Significance to Māori chapter where rock art is identified, means change from non-irrigated primary production (including plantation forestry) to ~~irrigated~~agricultural production that is irrigated to a depth more than 10mm, or not controlled by a Freshwater Farm Plan on land that is not currently irrigated as of 1st March 2025.~~It also includes any change from irrigated crop and seed production to dairy farming.~~
296.3	Gavin Simpson	Definitions	Commercial activity NPS means any activity trading in goods, equipment or services. It	Oppose	Considers the definition captures not-for-profit and charity trading unlikely to be of a scale to cause significant adverse effects.	Seeks to amend as follows: Commercial activities: means any activity trading in goods, equipment or services for profit....
296.4	Gavin Simpson	Definitions	Farm building means a building used for the exercise of farming activities and excludes:	Oppose	Considers the term 'primary production activities' should be used consistently in the PDP.	Seeks to amend as follows: means a building used for the exercise of ~~farming~~ primary production activities and excludes:
296.5	Gavin Simpson	Definitions	Farm track An un-sealed private track serving permitted agricultural or forestry activit	Oppose	The definition of a farm track should also include tracks serving consented activities. Concerns exist about requiring tracks to remain unsealed without evidence of environmental harm, as sealing can reduce sediment loss and control dust, offering potential environmental benefits. Additionally, there is no clear definition for 'agricultural' activity, while multiple definitions exist for types of forestry. Therefore, the term 'farm track' should be broadened to encompass 'primary production' activities as	Seeks to amend as follows: Farm track: An un-sealed or sealed private track serving ~~permitted agricultural or forestry~~ primary production activities.

					defined in the NPS, which includes agriculture, forestry, and other related activities.	This would reduce consent burden on a wider range of activities and therefore be more in alignment with the Strategic Direction. In particular: SD-RA-o1 - Rural productive opportunities are enabled in the rural environment to recognise and sustain the significant contribution of primary production and rural industry activities to the social, cultural and economic well-being of the district.
296.6	Gavin Simpson	Definitions	Hazardous facility means a facility or activity that involves the use, storage or dispos	Oppose	No specific reason given.	Seeks to retain as notified.
296.7	Gavin Simpson	Definitions	Heritage professional means a person with a degree or recognised post-graduate qualifica	Amend	The definition is generally supported, as requiring a specified qualification and five years of experience aligns with regional council standards for 'Suitably Qualified Persons.' However, the phrase 'recognised post-graduate qualification' is considered too vague because it does not clarify who provides recognition or the criteria for it. A post-graduate qualification is inherently of a high level and, when in a heritage conservation or management field, meets the intent of the definition.	Seeks to amend as follows: Heritage professional: means a person with a degree or ~~recognised~~ post-graduate qualification in a field related to heritage conservation or management and either at least five years of experience in a heritage conservation or management role, or is supervised by a heritage professional that meets both the qualification and experience requirements.
296.8	Gavin Simpson	Definitions	Identified taoka has the same meaning as in the National Policy Statement on Indigenous	Oppose	The submission opposes in part due to the absence of a clear schedule of acknowledged or identified taoka, as the NPS-IB does not require iwi to provide such a list. The term 'taoka' is used throughout the plan to refer to various treasures, creating ambiguity about whether these are identified or acknowledged. Without an unambiguous list, it is difficult to make informed submissions on the plan's provisions for taoka.	Seeks to see an inserted schedule of identified taoka and acknowledged taoka. If none has been provided then use the schedule to note this fact. Remove provisions for taoka until a list is provided and provisions can be submitted on.
296.9	Gavin Simpson	Definitions	Intensive outdoor primary production means primary production activities involving the	Oppose	The inclusions and exclusions are supported, but some terminology in the definition is considered too vague and open to subjective interpretation. Specifically, the phrase 'where the regular feed source for the production of goods is substantially provided other than from the site concerned' lacks clarity. Plan users need clearer definitions of what is meant by 'regular' and 'substantially provided other than from the site concerned.'	More closely define how much imported feed is needed to meet the threshold. During drought conditions pastoral farms may need to import most of their feed. It would be unduly onerous to require a resource consent in these circumstances. Seeks to amend as follows: Intensive outdoor primary production means primary production activities involving the keeping or rearing of livestock, or commercial aquaculture, where the ~~regular~~ majority feed source for the production of goods is ~~substantially~~ provided other than from the site concerned. The activity may be undertaken entirely outdoors or in a

						combination of indoors and outdoors, including within an outdoor enclosure. It includes: ... e. Primary production activities when a drought is declared
296.10	Gavin Simpson	Definitions	Pervious surface means any part of a site which is grassed or planted in trees or shrubs	Oppose	Oppose in part Other surfaces may be pervious such as stones or other types of garden.	Seeks to amend as follows: Pervious surface means any part of a site which ~~is grassed or planted in trees or shrubs and~~ is capable of absorbing water including soft landscaping, grass and planted trees or shrubs.. It does not include impervious surfaces or any area which: ...
296.11	Gavin Simpson	Definitions	Potentially high-impact industrial activities means industrial activities that because o	Oppose	noting that the definition seems to include hunting and home kill, which lack the scale to justify being classified as high impact, and septic tanks, which could duplicate regional council consent requirements. These activities are historically necessary on farms, and adding consent burdens could restrict affordable housing and food provision. Requiring two consents for one septic tank is inefficient, and farms already have regulated means for disposing of small numbers of dead animals under regional council permitted activity criteria. Including these in the district plan would create unnecessary duplication.	Seeks to amend as follows: Potentially high impact industrial activities means industrial activities that because of their nature or scale has a greater potential to impact on the receiving environment than other industrial activities and are those listed below: 1. manufacture and processing of chemical fertilisers; 2.commercial and non-pest species meat processing, or ~~any~~ associated processing of meat and meat by-products, or co-products; 3. fish curing, cleaning, treatment, preserving and storage; ... 10. storage and disposal of sewage, septic tank sludge, or refuse other than at the source;
296.12	Gavin Simpson	Definitions	Recreational activity means the use of land and/or buildings for the purpose of active o	Oppose	Oppose in part - This is a circular definition because it uses itself in it's definition.	Seeks to amend as follows: Recreational activity: means the use of land and/or buildings for the purpose of active or passive enjoyment of organised sports, ~~recreation~~ or entertainment. Excludes any recreational activity within the meaning of residential activity.
296.13	Gavin Simpson	Definitions	Regionally significant infrastructure is: strategic land transport network and arterial	Support	No specific reasons given	Seeks to retain as notified particularly with irrigation and stock water schemes included.

296.14	Gavin Simpson	Definitions	Repair workshop means the mechanical repair and servicing of motor vehicles (includes mo	Oppose	The submission opposes in part because the definition currently applies only to the Local Centre Zone. If extended to other zones once the plan becomes operative, it could unintentionally include farm and residential workshops.	Seeks to retain as proposed (only in LCZ). BUT Should it apply to other zones, amend as follows: Repair workshop means the commercial mechanical repair and servicing of motor vehicles (includes motorcycles, caravans, boat motors, trailers) inside a building.
296.15	Gavin Simpson	Definitions	Sensitive environment area of land contained within any of the following areas: Coa	Oppose	Oppose in part The district plan has no jurisdiction on airspace. The correct term for the height of land above sea level is elevation.	Seeks to amend as follows: Delete 11. Above 900 metres in altitude Or, if the intent is to include land above 900m elevation then amend the definition as follows: ... 11. Above 900 metres in ~~altitude~~ elevation
296.16	Gavin Simpson	Definitions	Riparian margin means: for land in the General Rural Zone, all landward property adjo	Oppose	Considers the definition is inconsistent with other measures under the RMA which manage similar sediment issues such as the regulations controlling intensive winter grazing which have a 5m buffer.	Seeks to amend as follows: 1. ~~for land in the General Rural Zone,~~all landward property adjoining and within ~~20~~5 metres of the boundary of the bed of a river or lake, or of the edge of a wetland; ~~and~~ ~~2. for land outside the General Rural Zone, all landward property adjoining and within 10 metres of the boundary of the bed of a river or lake, or of the edge of a wetland.~~
296.17	Gavin Simpson	Definitions	Temporary activity means activities and their ancillary buildings and structures that ar	Support	Supports the definition but considers that the undefined term 'helicopter' could be interpreted too broadly and include anything from a drone, gyrocopter through to high impact military helicopters which require support services. Considers that the term 'aircraft' isappropriate touse as it encompasses helicopters, drones, gyrocopters, and fixed-wingaircraft.	Seeks to amend clause (6) as follows: 6. temporary ~~helicopter~~aircraft take-offs and landings; and
296.18	Gavin Simpson	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Considers that the term 'chemical' [clause (6)] is too broad and could include harmless substances like water or atmospheric gases and that requiring proof of a change to the hydrological balance is impractical, as baseline data is not generally available. Considers that many of the listed effects may occur accidentally or naturally, and the wording should allow for such occurrences. Considers it ambiguous whether cushionfield[clause (8)] is the competitor or the outcompeted species referred to. Also considers the reference to mob-stocking [clause (10)] is unclear and potentially contradictory, as grazing is excluded from the definition and is often beneficial to ecosystems - suggests using	Seeks to amend as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation establishedasat1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate:

					the term 'pugging' as an alternative. Considers that the term 'established farming practice' lacks a clear method or explanation for how it is determined. Considers that restrictions on indigenous vegetation removal may disincentivise new plantings and will be more expensive to establish than exotic species (which also offer better returns under the Emissions Trading Scheme) and would also limit access to non-threatened indigenous species like manuka, which are valuable for low-cost home heating.	1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of ~~chemicals~~ harmful substances including herbicide; 7. burning; 8.~~the deliberate~~ application of water, fertiliser or oversowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion~~, including dryland cushionfield species;~~ 9.~~the~~ drainage of mapped wetlands or lakes; ~~10. mob-stocking; and~~ 11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site;~~ b. walking; c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood
296.19	Gavin Simpson	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried (not mined). Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	Seeks to amend as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones,~~and a prescribed substance within the meaning of the Atomic Energy Act 1945
296.20	Gavin Simpson	Mana whenua	General	Support	Support in part [Refer to original submission for full reasons]	Seeks to retain as notified
296.21	Gavin Simpson	Mana whenua	Consultation with mana whenua	Support	Supports in part. Support is expressed for clearly identifying when mana whenua may be affected by a proposal. Considers that where iwi consultation is encouraged, costs should be recoverable and that for matters of national importance (including mana whenua, historic heritage, natural features, ecosystems, and natural hazard), costs should be publicly funded, not charged to individual applicants. Considers that specifying applicant fees is outside the scope of the PDP and that consultation processes should be guided by memorandums of understanding or similar, as recommended in the SASM Section 32 report.	Seeks o remove reference to applicants being charged fees for consultation and for a memorandum of understanding to be consulted on prior to further submissions.
296.22	Gavin Simpson	Natural Hazards	NH-O1 Natural hazard risk The risks from natural hazards,	Support	Supports with modifications to include proportionality of the avoidance and mitigation to the level of risk.	Seeks to amend as follows:

			including the effects of climate			The impact on people, property and the environment from the risks of natural hazards and the effects of climate change are recognised, avoided or mitigated relative to the level of risk.
296.23	Gavin Simpson	Natural Hazards	NH-P1 Identification of natural hazard areas As information becomes available, identify an	Support	Support in part with modification to better focus the policy.	Seeks to amend as follows: As information becomes available, identify and map land that ~~may~~is known to be subject to natural hazards, including taking into account the effects of climate change.
296.24	Gavin Simpson	Natural Hazards	NH-P2 Risk based approach Avoid subdivision, use and development in areas where natural	Support	No specific reasons given	Retain as notified
296.25	Gavin Simpson	Natural Hazards	NH-P3 Critical facilities and regionally significant infrastructure Avoid locating critica	Support	No specific reasons given	Retain as notified
296.26	Gavin Simpson	Natural Hazards	NH-P4 Natural protection features Encourage the use, protection, maintenance and enhanc	Support	Support with recommendation to expand scope to explicitly require engineering solutions where natural protection features are unsuitable, particularly in cases involving the protection of infrastructure, people, and property, where more reliable methods may be necessary.	Seeks to amend as follows: Encourage the use, protection, maintenance and enhancement of natural features, buffers and systems, such as wetlands and vegetation, which provide protection from natural hazard risk where engineering solutions are not required to mitigate risk to people, property and infrastructure.
296.27	Gavin Simpson	Natural Hazards	NH-P13 Other natural hazard awareness overlays Encourage proposals for subdivision, use an	Support	Supports in part but considers an assessment should not be required in all cases, especially when there's no evidence that a specific use is at risk from an awareness overlay. Considers there is no clear definition of what constitutes an 'acceptable level' of risk and who determines it.	Seeks to amend as follows: Encourage proposals for subdivision, ~~use~~and development in a natural hazard awareness overlay to undertake an assessment of natural hazard risk and incorporate any methods to reduce or mitigate the risk. ~~to an acceptable level.~~ Alternatively, if 'use' is to remain, seeks to amend as follows: Encourage proposals for subdivision, use and development in a natural hazard awareness overlay to ~~undertake an assessment~~consider the effects of natural hazard risk and incorporate methods to reduce or mitigate the risk ~~to an~~ acceptable level.
296.28	Gavin Simpson	Natural Hazards	NH-R1 Buildings, structures and fences in the Otago Flood Assessment Overlay All zones	Oppose	Considers the definition should acknowledge that other farm structures, like poles or irrigation infrastructure, are not more flood-prone or hazardous than those already listed and may even mitigate risk. Considers the term 'suitably qualified and experienced professional' should be clarified.	Seeks to amend as follows: PER-1 The building or structure is: ... 3. an unenclosed building without a floor or with a concrete

						floor; or ... 6. a pole; or 7. irrigation or stockwater infrastructure Seeks clarification on the term 'suitably qualified and experienced professional'
296.29	Gavin Simpson	Natural Hazards	NH-R2 Buildings, structures and fences in the Canterbury Flood Assessment Overlay All z	Oppose	Considers the definition should acknowledge that other farm structures, like poles or irrigation infrastructure, are not more flood-prone or hazardous than those already listed and may even mitigate risk.	Seeks to add provision for other floors in buildings and structures like poles and water infrastructure.
296.30	Gavin Simpson	Natural Hazards	NH-R4 Earthworks excluding land disturbance in all Flood Assessment Overlays All zones	Support	Supports with recommendation to permit the building of tracks.	Seeks to amend as follows: PER-3 The earthworks are for the construction of a farm track.
296.31	Gavin Simpson	Natural Hazards	NH-R6 Land use activities in the Canterbury Flood Assessment Overlay, the Otago Flood Assessme	Support	Supports with recommendation to add other uses which are compatible with the objectives and policies of the Natural Hazards chapter such as airstrips and helicopter take off and landing areas.	Seeks to amend as follows: 5. Aeroplane airstrips and helicopter take-off and landing areas.
296.32	Gavin Simpson	Natural Hazards	NH-P5 Site specific assessment/investigation A risk assessment will be required for subdiv	Support	No specific reasons given	Retain as notified
296.33	Gavin Simpson	Natural Hazards	NH-P6 Canterbury Flood Assessment Overlay Except as provided for in NH-P3, avoid subdiv	Support	No specific reasons given	Retain as notified
296.34	Gavin Simpson	Natural Hazards	NH-P7 Otago Flood Assessment Overlay and Waitaki River Floodplain Assessment Overlay Ex	Support	No specific reasons given	Retain as notified
296.35	Gavin Simpson	Natural Hazards	NH-P11 Liquefaction Assessment Overlay Provide for subdivision in the Liquefaction Assessm	Support	No specific reasons given	Retain as notified
296.36	Gavin Simpson	Natural Hazards	NH-P12 Wildfire – subdivision and land use Ensure that subdivision and land use in area	Support	No specific reasons given	Retain as notified
296.37	Gavin Simpson	Natural Hazards	NH-R3 Buildings, structures and fences in the Waitaki River Floodplain Assessment Overlay	Oppose	Considers the definition should acknowledge that other farm structures, like poles or irrigation infrastructure, are not more flood-prone or hazardous than those already listed and may even mitigate risk.	Seeks to add provision for other floors in buildings and structures like poles and water infrastructure.

296.38	Gavin Simpson	Natural Hazards	NH-R13 Wildfire – woodlots, shelterbelts, plantation forestry and buildings All zones	Amend	Supports with modification to encourage the planting of low flammability plants, particularly near houses.	Seeks to amend as follows: PER-4 The wood lot, shelterbelt or plantation forestry is a species listed in the FENZ Low Flammability Plant Directory.
296.39	Gavin Simpson	Hazardous Substances	General	Support	Support for chapter and definitions	Retain as notified
296.40	Gavin Simpson	Historic Heritage	HH-O1 Protection of historic heritage The District's historic heritage is recognised, main	Support	No specific reasons given	Retain as notified
296.41	Gavin Simpson	Historic Heritage	HH-O2 Use and adaptive re-use of historic heritage Historic Heritage Items and their herit	Support	Supports noting that primary production is sympathetic re-use of the heritage settings where existing.	Retain as notified
296.42	Gavin Simpson	Historic Heritage	HH-P1 Recognise historic heritage Identify Historic Heritage Items and their associated	Support	Support with recommendation to recognise landowners' interests and consent in heritage protection. Considers heritage protection to be more effective when landowners are constructively engaged and permission is required for listing.	Seeks to amend as follows: With landowner permission, identify Historic Heritage Items and their associated heritage settings throughout the Waitaki district that warrant protection in SCHED2 – Historic Heritage Items, and are significant in terms of one or more of the following values: ...
296.43	Gavin Simpson	Historic Heritage	HH-P2 Historic heritage scheduling Classify Historic Heritage Items and their associate	Support	No specific reasons given	Retain as notified
296.44	Gavin Simpson	Historic Heritage	HH-P3 Benefits of active use, adaptive re-use, and protection of historic heritage Recogni	Support	Support in the context of re-use being primary production.	Retain as notified
296.45	Gavin Simpson	Historic Heritage	HH-P4 Heritage maintenance Enable the use and heritage maintenance of the Historic Heri	Support	Support in the context of re-use being primary production.	Retain as notified
296.46	Gavin Simpson	Historic Heritage	HH-P5 Modern service attachments Enable attachments to Historic Heritage Items included	Support	No specific reasons given	Retain as notified
296.47	Gavin Simpson	Historic Heritage	HH-P6 Heritage restoration Control the heritage restoration of Historic Heritage Items	Support	No specific reasons given	Retain as notified
296.48	Gavin Simpson	Historic Heritage	HH-P7 Retaining historic heritage – earthquake and	Support	No specific reasons given	Retain as notified

			flooding resiliency Encourage earthquak			
296.49	Gavin Simpson	Historic Heritage	HH-P8 Protecting historic heritage from inappropriate heritage alterations Provide for	Support	No specific reasons given	Retain as notified
296.50	Gavin Simpson	Historic Heritage	HH-P9 Relocation of Historic Heritage Items within or beyond their heritage setting Allow	Support	No specific reasons given	Retain as notified
296.51	Gavin Simpson	Historic Heritage	HH-P10 Demolition or destruction of Category B Historic Heritage Items Only allow the d	Support	No specific reasons given	Retain as notified
296.52	Gavin Simpson	Historic Heritage	HH-P11 Demolition or destruction of Category A Historic Heritage Items Avoid the demolitio	Support	No specific reasons given	Retain as notified
296.53	Gavin Simpson	Historic Heritage	HH-P12 Buildings and structures within heritage settings Only allow new buildings and s	Support	No specific reasons given	Retain as notified
296.54	Gavin Simpson	Historic Heritage	HH-P13 Subdivision of sites containing Historic Heritage Items Only allow subdivision o	Support	No specific reasons given	Retain as notified
296.55	Gavin Simpson	Historic Heritage	HH-P14 Planning incentives to encourage the sustainable use of Historic Heritage Items Ass	Support	No specific reasons given	Retain as notified
296.56	Gavin Simpson	Historic Heritage	HH-P15 Future consideration of historic heritage Council continues to investigate the iden	Oppose	Considers this to be a council matter, not a planning matter as future councils may have different priorities and should not be bound by past policies or required to undertake a plan change between cycles.	Seeks to delete the policy.
296.57	Gavin Simpson	Historic Heritage	HH-R1 Heritage maintenance on Historic Heritage Items listed in SCHED2 – Historic Heritage Ite	Support	No specific reasons given	Retain as notified
296.58	Gavin Simpson	Historic Heritage	HH-R2 Animal grazing on sites and their heritage setting identified in SCHED2 – Historic Herit	Support	Supports in the context of a working farm.	Retain as notified
296.59	Gavin Simpson	Historic Heritage	HH-R3 Earthworks within the heritage setting of a Historic	Support	Supports in the context of a working farm.	Retain as notified

			Heritage Item listed in SCHED2 – Hi			
296.60	Gavin Simpson	Historic Heritage	HH-R5 New buildings, structures and signs, or alterations to an existing building or structure	Support	Support with suggested modifications to reflect the practical needs of heritage items located in a rural context where structures like fences and pipes are necessary for primary production.	Seeks to amend as follows: PER 1 Any new building, structure or sign is: … 5. is a post and wire or post and rail fence; or 6. is irrigation or stock water infrastructure; or
296.61	Gavin Simpson	Historic Heritage	HH-R12 Relocation of a Category B Historic Heritage Item listed in SCHED2 – Historic Heritage	Support	No specific reason given	Retain as notified
296.62	Gavin Simpson	Historic Heritage	HH-R13 Relocation of a Category A Historic Heritage Item listed in SCHED2 – Historic Heritage	Oppose	Considers that the relocation of heritage items can sometimes improve their condition or address health and safety risks (for example the Herbert War Memorial) and that making consent too difficult may increase the risk of demolition by neglect.	Seeks to amend HH-R13 to a discretionary activity.
296.63	Gavin Simpson	Historic Heritage	HH-R14 Any demolition of a Historic Heritage Item listed in SCHED2 – Historic Heritage Items	Oppose	Considers this to be a council matter, not a planning matter as future councils may have different priorities and should not be bound by past policies or required to undertake a plan change between cycles.	Seeks to delete HH-M1
296.64	Gavin Simpson	Historic Heritage	HH-R14 Any demolition of a Historic Heritage Item listed in SCHED2 – Historic Heritage Items	Support	Supports the intent but considers this to be a council matter rather than a planning matter.	Seeks to delete HH-M4
296.65	Gavin Simpson	Notable Trees	General	Support	Support for the chapter	Retain as notified
296.66	Gavin Simpson	Notable Trees	TREE-P5 Other trimming and pruning of Notable Trees Provide for any other trimming of N	Support	Support with modifications as not possible to confirm long-term impacts of trimming on tree health or lifespan in advance. Considers 'likelihood' is a more practical measure than certainty. Also considers that trimming may alter a tree's natural form, especially when removing diseased or hazardous limbs and that TREE-S1 should also be considered regarding the retention of natural form.	Seeks to amend as follows: Provide for any other trimming of Notable Trees where it can be demonstrated that the works do not: 1.likely compromise the long-term health of the Notable Tree; 2. compromise the identified values of the Notable Tree, listed in SCHED4 - Notable Trees; 3.likely reduce the natural life of the Notable Tree; 4. increase the risk of the Notable Tree being subject to wind damage; and 5. impact the natural shape and form of the Notable Tree more than necessary.

296.67	Gavin Simpson	Notable Trees	TREE-S1 Trimming of Notable Trees All zones The maximum branch diameter being trimm	Support	No specific reason given	Retain as notified
296.68	Gavin Simpson	Notable Trees	TREE-S2 Trimming or removal of Notable Trees posing a threat to people or property All	Support	No specific reason given	Retain as notified
296.69	Gavin Simpson	Notable Trees	TREE-S3 Trimming or removal of Notable Trees All zones The works are undertaken or	Support	No specific reason given	Retain as notified
296.70	Gavin Simpson	Notable Trees	TREE-R1 Maintenance of the ground within the root protection area of a Notable Tree All	Support	No specific reason given	Retain as notified
296.71	Gavin Simpson	Notable Trees	TREE-R2 Trimming or pruning of a Notable Tree All zones Activity status: Permitted	Support	No specific reason given	Retain as notified
296.72	Gavin Simpson	Notable Trees	TREE-R3 Removal of a Notable Tree All zones Activity status: Permitted Where: PER-1	Support	No specific reason given	Retain as notified
296.73	Gavin Simpson	Sites and Areas of Significance to Maori	General	Oppose	[refer to original submission for full reasons]	[Refer to original submission for relief sought]
296.74	Gavin Simpson	SCHED5 – Schedule of Sites and Areas of Significance to Maori	ID ref Name Description and Values SASM015 Ōtewhakauki Ōtewhakau	Oppose	Oppose in part Schedule 5. The property is encumbered with the following SASM overlays: SASM013 [refer to original submission for full reasons]	[Refer to original submission for relief sought]
296.75	Gavin Simpson	Sites and Areas of Significance to Maori	General	Oppose	Considers that Freshwater Farm Plans are set to become the primary planning tool for farmland and aim to streamline consent processes by managing farming effects within a single plan under the RMA, and these may also incorporate SASM values. Considers that Freshwater Farm Plans retain level playing field because the landowner is obligated to have it certified to carry out activities, while the iwi are obligated to consult with the landowner to advise on protection of their significant sites. Both obligations require good faith and genuine relationships rather than expensive consent burdens involving the district council.	Seeks to reduce consent burdens on farmers and allow them to plan directly with iwi in good faith through Freshwater Farm Plans.
296.76	Gavin Simpson	Mana whenua	General	Oppose	Considers there to be a conflict of interest as the plan states that Aukaha helped draft the provisions and will also charge for consultation on them. Considers there needs to be a clear separation between plan-making and implementation.	Seeks that farms with a certified Freshwater Farm Plan (FWFP) include a chapter on SASM management, allowing for permitted activity status. Alternatively, consultation could be provided by a Suitably Qualified Person (SQP) with relevant qualifications and experience, promoting a competitive market and reducing workload for iwi.

296.77	Gavin Simpson	Sites and Areas of Significance to Maori	General	Oppose	Considers the uncertainty of time and cost associated with consenting, particularly under the SASM provisions should be supported by a service level agreement. Considers that some issues are better addressed through RMA reform and that many Significant Natural Areas and Natural Features and Landscapes appear to have been mapped without proper landowner engagement.	Seeks for the withdrawal of the Sites and Areas of Significance to Māori, Natural Features and Landscapes, Natural Character and Ecosystems and Biodiversity Chapters until the RMA reform is complete and an MOU is in place with Aukaha detailing time and cost of consultation.
296.78	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-O1 Rakatirataka and kaitiakitaka The rakatirataka of mana whenua over their signif	Amend	Supports the intent with modification to clarify that the objective is not intended to be in isolation from the landowner. Considers that that the exercise of kaitiakitaka can't be implemented without agreement from the and owners who have their own rights and responsibilities within their own relationship with the land.	Seeks to amend as follows: The rakatirataka of mana whenua over their significant sites and areas is recognised and they are able to exercise kaitiakitaka within these areas with agreement from the landowners.
296.79	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-O2 Protection of wāhi tūpuna values The relationship of mana whenua with wāhi tūpuna	Support	Support for the objective particularly the goal of increasing community awareness of wāhi tūpuna values. Considers that landowners have historically maintained relationships with these sites without needing district plan provisions and that regulation is not necessary to sustain mana whenua connections.	Seeks that the values for protection need to be identified in the PDP.
296.80	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-O3 Preservation of tuhituhi neherā The integrity of tuhituhi neherā sites is prese	Support	No specific reasons given	Retain as notified
296.81	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-O4 Enhancement of mahika kai Mahika kai values are enhanced to support customary use.	Support	Support with modification to recognise that mahikakai values are maintained and where appropriate these values enhanced, as it may not always be possible to enhance.	Seeks to amend as follows: Mahika kai values are maintained or, enhanced where appropriate to support customary use.
296.82	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-O5 Access and use for customary purposes Mana whenua are able to access wāhi tūpuna f	Oppose	Considers theobjectiverequires clarification that it does not imply a general right of access to wāhitūpunaand that access should be with landowner permission. Considers the Trespass Act is impractical for managing access and may strain iwi–landowner relationships.	Seeks to amend as follows: Mana whenua are able to access, where appropriate, wāhi tūpuna for customary purposes and are able to use mahika kai resources in accordance with tikaka and with landowner agreement.
296.83	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-P1 Identification of wāhi tūpuna Working with mana whenua, identify, on Planning m	Support	No specific reason given	Retain as notified
296.84	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-P2 Mana whenua involvement in resource management processes Provide for the invol	Oppose	Considers the policy should clarify whether rules apply only where wāhi tūpuna values remain, or even where they've been physically altered but still hold cultural significance. Considers that consultation for all activities within or near wāhi tūpuna areas places a significant burden on landowners and mana whenua and the policy should be more targeted, directing consultation and notification to situations where it would meaningfully support the protection or enhancement of wāhi tūpuna values.	Seeks to amend the SASM overlay to map only where the values are known to still exist. If the maps cannot be changed, seeks to amend as follows: Provide for the involvement of mana whenua in resource management processes affecting identified wāh itūpuna by encouraging consultation and engagement with mana whenua prior to undertaking activities which will have an adverse effect on

						the maintenance or enhancement of ~~or applying for resource consent within or adjoining~~identified wāhi tūpuna.
296.85	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-P3 Management of wāhi tūpuna Only allow or provide for land use and development in id	Support	Support with amendment to provide for the protection of existing uses.	Seeks to amend as follows: ~~Only allow or provide for~~ Ensure new land use and development in identified wāhitūpuna ~~where it~~ avoids significant adverse effects, and avoids, remedies or mitigates other adverse effects, on the remaining values associated with these areas, having particular regard to:
296.86	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-P4 Obstruction of mauka, tuhituhi neherā and wai māori by structures Avoid the loc	Support	Support is given in part to SASM-P4, with a preference for clearly identifying the locations of mauka, tuhituhineherā, and waimāori on District Plan maps to guide where structures should be avoided. Considers provision should also be made for compatible structures that support land uses enhancing wāhi tūpuna values, and the policy should explicitly protect existing uses while avoiding vague terms like “or near.”	Seeks to amend as follows: Avoid the location of new structures in riparian margins, on ~~or near~~ limestone outcrops, on upper slopes and on ~~or near~~ ridgelines unless: 1. they do not obstruct views to and across culturally significant waterbodies, tuhituhi neherā or mauka; and 2.~~they avoid adverse effects on the~~ the structure can maintain or enhance the wāhi tūpuna values of these areas.
296.87	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-P5 Protection of integrity of tuhituhi neherā Avoid the following activities on, o	Oppose	Concerns with the assumptions in irrigation modelling used to assess impacts and considers evidence suggests water loss may be overestimated and low-rate irrigation can avoid adverse effects. Considers that while the intent to protect tuhituhi neherā is supported, the policy should acknowledge that some existing agricultural and forestry activities have been compatible with these values and may continue to be so.	Seeks to permit and encourage low-rate irrigation and discourage high-rate irrigation [refer to original submission]. Also seeks for the protection of existing uses to be explicitly provided for in SASM-P4. Seeks to amend as follows: Avoid the following new activities on areas mapped as, ~~or in close proximity to~~, limestone outcrops. 1.~~agricultural intensification~~high-rate irrigation; and 2. plantation forestry, unless any adverse effects on the integrity of tuhituhi neherā from disturbance of land and vegetation and changes in the water table, soil water environment and air moisture are avoided.
296.88	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-P6 Culturally incompatible activities Avoid degradation of the values of wāhi tūpu	Support	No specific reason given.	Seeks to retain as notified.
296.89	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-P7 Habitat restoration and enhancement Encourage restoration and enhancement of indig	Support	No specific reason given.	Seeks to retain as notified.

296.90	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-P8 Mahika kai activities Enable mana whenua to undertake mahika kai activities in ide	Support	Support in part with a request for modification, as the PDP does not grant general access rights or transfer ownership of mahikakai resources, and the current user notes lack legal standing and clarity on ownership. Considers the policy should be reworded to more accurately reflect how the objective will be achieved while fostering respectful relationships between landowners and iwi.	Seeks that the PDP should clarify that landowner permission is required to undertake mahikakai. Also seeks to amend as follows: Enable mana whenua to undertake mahikakai activities in identified wāhi tūpuna, in accordance with tikaka and with landowner agreement.
296.91	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-P9 Access for customary purposes Maintain existing access opportunities and encourage	Support	Support in part with a request to clarify that it does not create a general right of access to wāhi tūpuna on private land and that access should remain subject to landowner permission. Considers the policy should be reworded to reflect existing legal frameworks and practical considerations, ensuring respectful relationships and sustainable resource management.	Seeks to amend as follows: Maintain existing access opportunities and encourage enhancement of access, where appropriate, for mana whenua to identified wāhi tūpuna for customary purposes with landowner agreement.
296.92	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-P10 Wilding conifer species Protect wāhi tūpuna from modification by wilding conifer	Support	No specific reason given.	Seeks to retain as notified.
296.93	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-R1 Mahika kai activities within a wāhi tūpuna identified in SCHED5 – Sites and Areas of S	Support	Support in part with modifications.	Seeks to amend as follows: Activity status: Permitted Where: PER-1: An agreement is reached with the landowner permitting access and use of resources. Activity status when compliance is not achieved: ~~Not Applicable~~ Prohibited Note: The provisions in this rule do not override the provisions of the Trespass Act 1980. There is no general right of public access across private land or right to use private resources.
296.94	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-R2 Buildings and structures within a wāhi tūpuna identified in SCHED5 - Sites and Areas o	Oppose	Opposes in part, as the 200m^2 threshold lacks justification and may unnecessarily increase consent requirements, while compatible structures that support wāhi tūpuna values should be distinguished. A 6m height limit for buildings and 25m for structures such as silos is supported, and low-rate irrigation infrastructure should be permitted within 100m of limestone cliffs to avoid unintended environmental impacts. The rule should clarify restricted discretionary matters, avoid unnecessary expert assessments, and ensure access, alternatives, and enhancement requirements are practical and proportionate [refer to original submission].	Seeks to amend as follows: Activity status: Permitted Where: PER-1 The building or structure has a maximum building footprint of ~~200~~ 350m2; and PER-2 The building ~~or structure~~has a maximum height of 6m as measured from the existing natural ground level; and.

						PER-3 The structure has a maximum height of 25m; and ~~PER-3~~PER-4 The building or structure is not located within 20m of a waterbody or 50m of a wetland (excluding farm buildings or farm structures less than 10m2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating);and ~~PER-4~~PER-5 The building or structure is not located on, or within, 100m of a limestone escarpment (excluding farm buildings or farm structures less than 10m2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating); and ~~PER-5~~PER-6 The building or structure is not located on or within 20m vertical distance of a ridgeline (excluding farm buildings or farm structures less than 10m2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating); and ~~PER-6~~PER-7 The building or structure is located at an elevation less than 900m above sea level (excluding farm buildings or farm structures less than 10m2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating). Matters of discretion are restricted to: 1. whether the relevantrūnakahas been consulted, the outcome of that consultation, and the extent to which the proposal responds to, or incorporates the outcomes of that consultation; and 2. the ~~potential~~ adverse effects on the values of the wāhitūpuna, and the relationship of mana whenua with the area, including: a. loss of wāhitūpunaassociations through modification of the landscape and natural processes; and ~~b. damage to the integrity of wāhitūpunathrough disturbance of land and/or indigenous vegetation; and~~ c. disturbance of wāhi tapu and archaeological sites; and d. adverse effects on the ~~integrity~~preservation of tuhituhi

						neherā sites ~~including through disruption of the landform or water balance in the area;~~and e. adverse effects on the mauri of waterbodies; and f. reduction in the extent and quality ofmahikakai; and ~~g. loss of access to mahika kai for customary activities; and~~ 3. effects on sites where there is the potential forkōiwior artefacts to be found, including consideration of the need to impose an accidental discovery protocol or have a cultural monitor present; and ~~4. whether there are alternative methods, locations or designs that would avoid or reduce the impact on the values associated with wāhitūpuna; and~~ ~~5. the appropriateness of any mitigation measures, including monitoring, planting or improved access for customary use; and~~ ~~6. whether the proposal provides an opportunity to recognise mana whenua culture, history and identity associated with the wāhi tūpuna, and any potential to:~~ ~~a. affirm the connection between mana whenua and the wāhi tūpuna; or~~ ~~b. enhance the cultural values of the wāhi tūpuna~~ Activity status when compliance is not achieved: ~~Non-Complying~~Discretionary Where: ~~NC-1~~DIS-1 Compliance is not achieved with PER-3, PER-5 and/or PER-6 Notification: Any application made under RDIS-1 and/or NC-1 may be notified to Te Rūnanga o Moeraki
296.95	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-R3 Indigenous vegetation clearance within a wāhi tūpuna, identified in SCHED5 - Sites and	Support	Support with request to modify the rule so it does not discourage landowners from planting new indigenous vegetation, and to allow a permitted pathway for indigenous vegetation removal where landowners have certified Freshwater Farm Plans.	Seeks to amend as follows: PER-1 ... k. improved pasture ... ~~PER-4~~ The indigenous vegetation was planted after 1st March 2025 and complies with a certified Freshwater Farm Plan.
296.96	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-R4 Earthworks within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significanc	Oppose	Oppose in part as it excludes earthworks for permitted building platforms and would create unnecessary consent requirements for routine activities, especially where SASM overlays cover farm bases and improved pasture with no archaeological value. The submitter suggests either removing SASM overlays from such areas or modifying the rule to increase earthworks thresholds	[refer to original submission for full relief sought] Seeks to amend as follows:

					(e.g., to 3m cut and 1,000m^2 area), manage effects through permitted activity criteria, and use boundary setbacks in residential settings, thereby reducing the consent burden while still protecting genuinely sensitive sites.	[GRUZ/RLZ/OSZ]: PER-3 The permitted activity standards of EW-R1 are complied with; and PER-4 Earthworks are set back 100m from tuhituhi nehera and complies with a certified Freshwater Farm Plan; and PER-5 Earthworks are set back 20m from mahikakai resources; and PER-6 Access to mahikakai resources is not obstructed; and ... PER-9 The earthworks are associated with any permitted activity under SASM-R2. [GRZ/SETZ] Where: ~~PER-5~~PER-10 All earthworks where they comply with the following earthworks standards where relevant: 1. EW-S1 Threshold areas [submitting change to 1,000m]. 2. EW-S2 Maximum cut depth and fill height [submitting change to 3m cut and fill depth];and 3. EW-S4 Earthworks within 20 metres of a waterbody
296.97	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-R5 Urupā within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significance to	Support	Support for existing urupā, but request that new urupā be treated the same as cemeteries due to similar environmental effects, while acknowledging their different cultural and spiritual significance.	Seeks to retain as notified.
296.98	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-R6 Amenity planting and shelterbelts within a wāhi tūpuna, identified in SCHED5 – Sites a	Support	Support but considers specific provision to permit existing shelterbelts within 100m of limestone escarpments is required.	Seeks to amend as follows: Where: PER-1 The new amenity planting or shelterbelt is not located on or within 100m of a limestone escarpment.
296.99	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-R7 Natural hazard mitigation structures within a wāhi tūpuna, identified in SCHED5 - Site	Support	Support with modification to allow a permitted pathway for councils or private applicants to create natural hazard structures, provided iwi are consulted to ensure any permitted activity pathway addresses potential effects on cultural values.	Seeks to consult with iwi regarding effects they wish to manage with SASM-R7 and what a permitted activity pathway could be. Amend as follows:

						Activity status: ~~Restricted Discretionary~~Permitted PER-1 Fish passage is not impeded. ~~Where:~~ ~~RDIS-1~~ ~~The structures are erected by, or on behalf of, Waitaki District Council, Otago Regional Council, or Canterbury Regional Council.~~ ~~Matters of discretion are restricted to:~~ ~~1. The matters of discretion listed in SASM-R2 RDIS-1.~~ Notification: Any application made under ~~this rule~~DIS-1 may be notified to TeRūnangao Moeraki.
296.100	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-R8 Agricultural intensification within a wāhi tūpuna, identified in SCHED5 - Sites and Ar	Oppose	No specific reason given.	[refer to original submission]
296.101	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-R9 Commercial outdoor recreation within a wāhi tūpuna, identified in SCHED5 - Sites and A	Support	Support if SASM overlays are adjusted to exclude improved pasture, otherwise, opposes the rule as considers it unnecessarily restricts landowner diversification in less sensitive areas without clear evidence of adverse effects. Considers iwi oversight is justified for archaeological sites, but requiring consent for recreation in non-sensitive areas needs strong justification.	Seeks to delete the rule if the SASM mapping remains.
296.102	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-R10 Plantation forestry activities within a wāhi tūpuna, identified in SCHED5 - Sites and	Support	No specific reason given.	Seeks to retain as notified.
296.103	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-R11 Mining activities, farm quarries or quarrying activities within a wāhi tūpuna, identi	Oppose	Oppose in part requesting that farm quarries be excluded from the rule and permitted with appropriate setbacks from sensitive sites, so properties mostly covered by a SASM overlay can still meet operational needs. Considers existing quarries should remain permitted, and the rule could be supported if the overlay mapping is rationalised as submitted.	Seeks to amend as follows: New mining activities, farm quarries or quarrying activities within a wāhi tūpuna ,identified in SCHED5 - Sites and Areas of Significance to Māori Activity status: ~~Discretionary~~Permitted Where: PER-1 The farm quarry is set back 100m from tuhituhi nehera, waterways, limestone escarpments, archaeological sites and cemeteries or urupa. ~~DIS-1~~PER-2 Gravel extraction is required for flood mitigation works. undertaken by a regional council.

						Notification: Any application made under NC-1 ~~this rule~~may be notified to TeRūnangao Moeraki.
296.104	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-R12 Cemeteries or crematoria within a wāhi tūpuna, identified in SCHED5 - Sites and Areas	Support	No specific reason given.	Seeks to retain as notified.
296.105	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-R13 Landfills within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significanc	Support	No specific reason given.	Seeks to retain as notified.
296.106	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-R14 Wastewater treatment plants within a wāhi tūpuna, identified in SCHED5 - Sites and Ar	Support	No specific reason given	Seeks to retain as notified.
296.107	Gavin Simpson	Sites and Areas of Significance to Maori	SASM-R15 Planting wilding conifer species within a wāhi tūpuna, identified in SCHED5 - Sites a	Support	No specific reason given.	Seeks to retain as notified.
296.108	Gavin Simpson	Earthworks	General	Oppose	Oppose in part noting that small-scale, occasional earthworks are essential for primary production, land management, and health and safety, and are critical to the economic and sustainable management of land and water resources.	No specific relief sought.
296.109	Gavin Simpson	Earthworks	EW-O1 Earthworks activities Earthworks activities enable people and communities, social	Support	No specific reason given.	Seeks to retain as notified.
296.110	Gavin Simpson	Earthworks	EW-O3 Protecting communities Earthwork activities are undertaken in a manner that maint	Support	No specific reason given.	Seeks to retain as notified.
296.111	Gavin Simpson	Earthworks	EW-O2 Protecting sensitive environments Indigenous biodiversity, natural landscapes, natur	Support	Support with modification to clarify and narrow scope by defining “natural landforms,” referencing “Significant Natural Areas” for indigenous biodiversity and aligning references to “natural landscapes” and “natural features” with Outstanding Natural Landscapes and Features, while ensuring existing earthworks in sensitive environments can continue. Considers the objective should also reference ‘Historic and Cultural Values’ for clarity and efficiency and protect long-standing activities like the Oamaru Stone Quarry within sensitive environments.	Seeks to amend as follows: ~~Indigenous biodiversity~~ Significant Natural Areas, Outstanding natural landscapes, ~~natural landforms,~~ Outstanding natural features, ~~mana whenua~~and historic and cultural ~~heritage~~ values are protected from the adverse effects of new earthworks.
296.112	Gavin Simpson	Earthworks	EW-P1 Enabling earthworks Enable earthworks where the scale, extent and effects are approp	Support	No specific reason given.	Seeks to retain as notified.
296.113	Gavin Simpson	Earthworks	EW-P2 Protecting sensitive environments Provide for	Support	No specific reason given.	Seeks to retain as notified.

			earthworks where adverse effects on th			
296.114	Gavin Simpson	Earthworks	EW-P3 Conservation activities within sensitive environments Enable earthworks that facilit	Support	No specific reason given.	Seeks to retain as notified.
296.115	Gavin Simpson	Earthworks	EW-P4 Primary production activities Enable earthworks that support the operational effi	Support	Support with modification to allow earthworks for installing identified infrastructure and farm buildings, as considers these are managed by existing standards and provide positive environmental effects. Considers enabling primary production activities should be maximised outside sensitive environments, which are already protected by other plan provisions.	Seeks to amend as follows: Enable earthworks that support the operational efficiency of primary production activities, including the construction, maintenance and repair of existing farm tracks, farm buildings, yards, irrigation systems, fences, dams, stormwater infrastructure, sedimentation ponds, culverts and stormwater drains.
296.116	Gavin Simpson	Earthworks	EW-P5 Construction and maintenance of farm tracks and recreational tracks Enable earthwork	Support	No specific reason given.	Seeks to retain as notified.
296.117	Gavin Simpson	Earthworks	EW-P6 Earthworks within the National Grid Yard Enable earthworks within the National Grid	Support	No specific reason given.	Seeks to retain as notified.
296.118	Gavin Simpson	Earthworks	EW-P7 The effects of earthworks Manage any earthworks to avoid, remedy or mitigate adve	Support	Support with modification to clarify that effects should be controlled beyond the site boundary and that visual amenity and local amenity values should only apply off-site and in sensitive environments, while removing soil quality as it is a regional council matter.	Seeks to amend as follows: Manage any earthworks to avoid, remedy or mitigate adverse effects on the following: 1. the stability of land, buildings and structures at or beyond the boundary of the site; and 2. the visual amenity values of the site in a sensitive environment, and after rehabilitation; and ~~3. natural landforms; and~~ 4. local amenity values beyond the boundary of the site; and 5. erosion and sediment loss from the site; and ~~6. natural hazard risk; and~~ 7. the stormwater management systems; and 8. dust, lighting, odour, vibration, noise and traffic beyond the boundaries of the site; and ~~9. soil quality.~~
296.119	Gavin Simpson	Earthworks	EW-P8 Rehabilitation of disturbed ground Enable earthworks that enhance, restore or rehabi	Support	Support with modification that restoration should not always reflect the surrounding landform and vegetation, but enhancement or rehabilitation may require different approaches such as replacing undesirable species with more suitable ones. Considers the policy should enable positive changes rather than require strict replication of existing conditions.	Seeks to amend as follows: Enable earthworks that enhance, restore or rehabilitate areas of disturbed ground ~~to reflect the surrounding landform and vegetation.~~
296.120	Gavin Simpson	Earthworks	EW-R1 General earthworks located outside of a sensitive environment All zones Activit	Support	Support with modified standards as detailed below [refer to original submission].	Seeks to retain as notified but with amended standards [refer to original submission]

296.121	Gavin Simpson	Earthworks	EW-R2 Earthworks for repair and maintenance activities within or outside of a sensitive enviro	Support	Support with the addition of construction of infrastructure and farm buildings, so that earthworks for house builds or small sheds are permitted without unnecessary extra consent, while large-scale construction remains controlled by existing thresholds.	Seeks to amend as follows: Earthworks for construction, repair and maintenance activities within or outside of a sensitive environment PER-1 ... 10. farm buildings; and PER-3 Earthworks undertaken for the lawful establishment of: 1. farm tracks; 2. yards; 3. water supply and irrigation systems; 4. fences; 5. dams/ponds; 6. walking and cycling tracks; 7. driveways and accessways; 8. stormwater infrastructure, sediment detention ponds, culvertsand stormwater drains; 9. coastal hard protection structures;
296.122	Gavin Simpson	Earthworks	EW-R3 Earthworks for the construction of farm tracks, public footpaths, public bridle paths an	Support	Support with amendment to allow wider dairy tracks (at least 6.5–8m) and accommodate larger machinery, as recommended by Dairy NZ and typical for the Waitaki District.	Seeks to amend as follows: Where: PER-1 The track is associated with a permitted or lawfully established activity within the zone and does not exceed ~~4~~8metres in width with an additional allowance of 1 metre either side of the track for battering; and
296.123	Gavin Simpson	Earthworks	EW-R4 Earthworks for conservation activities within a sensitive environment All zones	Support	Support with a higher threshold, as considers requiring consent for conservation earthworks in sensitive environments could discourage important activities like fencing SNAs or planting indigenous species.	Seeks to either permit the relevant earthworks thresholds for the underlying zone or increase the threshold within all conservation activities rules.

						Seeks to amend as follows: Earthworks for conservation activities within a riparian margin or sensitive environment Activity status: Permitted Where: PER-1 ~~On any site earthworks do not exceed 25m2 in area over any 3 year period.~~ ~~PER-2~~ All of the following standards are complied with: 1. EW-S2 Maximum cut depth and fill height; 2. EW-S3 Earthworks on sloping sites; and ~~3. EW-S4 Earthworks within 20m of a waterbody.~~ Activity status when compliance is not achieved: Restricted Discretionary Where: RDIS-1 Compliance is not achieved with ~~PER-2~~ PER-1 Matters of discretion are restricted to: 1. the matters of discretion listed in any of thestandardsEW-S2, EW-S3 and/or EW-S4 that are not complied with. ~~Activity status when compliance is not achieved: Discretionary~~ ~~Where:~~ ~~DIS-1~~ ~~Compliance is not achieved with PER-1~~
296.124	Gavin Simpson	Earthworks	EW-R5 Earthworks within a riparian margin All zones Activity status: Permitted Wher	Support	Support with modifications to clarify the distinction between regional and district council responsibilities, remove duplication in matters of discretion, permit maintenance of water supply systems, and limit consideration of cumulative effects to those specifically identified.	Seeks to amend as follows: PER-3 ... c. water supply or irrigation systems; Matters of discretion are restricted to: ... 2. the extent and management of adverse effects or cumulative effects on natural character of the riparian margin,

						including: a. the extent to which the proposed earthworks will: i. allow natural elements to dominate; and ~~ii. introduce man-made elements to the riparian margin; and~~ iii. affect the amenity values of the riparian margin; and iv. create disturbances that will be ... ~~ix. restrict access for mahika kai purposes; and~~ ~~3. any cumulative effects.~~
296.125	Gavin Simpson	Earthworks	EW-R6 Earthworks and land disturbance within the National Grid Yard All zones Activit	Support	No specific reason given.	Seeks to retain as notified.
296.126	Gavin Simpson	Earthworks	EW-R7 Earthworks within a sensitive environment All zones Activity status: Discretion	Support	No specific reason given.	Seeks to retain as notified.
296.127	Gavin Simpson	Earthworks	EW-S1 Threshold areas (m2) All Residential Zones Rural Lifestyle Zone Settlement Zo	Oppose	Considers that area thresholds are an inadequate tool for managing earthworks as they focus on the size of the activity rather than its environmental impact and effect management should take precedence over area measurement. Considers that thresholds should be used as matters of discretion or permitted activity criteria, not rigid limits and that the current thresholds are too low, capturing routine activities like house scrapes, silage pits, and shed construction. Also considers that the standards duplicate those in the NFL chapter, regarding landscape effects, which are subjective and undefined outside NFL overlays.	Seeks to remove area thresholds so they default to regional council thresholds and introduce standards or permitted activity criteria to manage the effects of earthworks directly. If threshold areas are to remain seeks to increase threshold to 1,000m2 for all zones. Seeks to amend as follows: Matters of discretion are restricted to: 1. whether ~~the~~earthworks changing the landform of a ridgeline are of a type, scale and form that is appropriate for the location and anticipated character of the zone; and 2. the management of silt, sediment and erosion on-site; and 3. impacts on ~~character and~~amenity values beyond the site boundary, ~~natural landforms and features~~, including whether the cut face and/or any retaining structures can be concealed behind development or effectively landscaped; and 4.~~visual amenity, including~~landscape treatment, site reinstatement and screening; and ~~5. the potential for cumulative effects on the natural form of the landscape; and~~ ... ~~Note: A landscape assessment may be required for the assessment of this standard.~~ ...

296.128	Gavin Simpson	Earthworks	EW-S2 Maximum cut depth and fill height The cut depth or fill height must not exceed 1	Support	Support for EW-S2 with modification to reduce the number of consents that will be required across the district.	Seeks to amend as follows: 1. The cut depth or fill height must not exceed ~~1.5~~3metres as measured vertically; and 2. Cut or fill supported by a retaining wall must be setback a distance at least equal to the height of the retaining wall. 3. Cut and fill equal to or less than 0.5m in height is exempt from this standard. 4. Cut and fill for building platforms is exempt from this standard. 5. Earthworks over 1.5m in height or depth that take place within 1.5m of a site boundary require a written approval from the adjoining landowner. ~~Note: Earthworks over 1.5m in height or depth that take place within 1.5m of a site boundary may require a written approval from the adjoining landowner.~~
296.129	Gavin Simpson	Earthworks	EW-S3 Earthworks on sloping sites Earthworks must not take place on slopes with an ang	Support	No specific reason given	Retain as notified
296.130	Gavin Simpson	Earthworks	EW-S4 Earthworks within 20 metres of a waterbody Earthworks shall not take place withi	Support	Support with modification to reduce consent costs and improve clarity around when ecological or landscape reports are required.	Seeks to amend as follows: Matters of discretion are restricted to: 1. the provision of sediment control techniques to ensure sediment run-off does not enter a waterbody; and 2. effects of earthworks within 5m of the waterbody on the natural character and ecological values of the waterbody; and ~~3. impacts on the character and amenity values, natural landforms and features; and~~ ~~4. management of visual amenity effects through~~landscape treatment, site reinstatement and screening; and ~~5. the potential for cumulative effects on the natural form of the landscape.~~ Note: A site management plan may be required for consideration of the assessment matter 1. Note: An ecological report ~~and/or landscape assessment~~may be required for consideration of matters of discretion (2),~~(3), (4) and (5)~~in EW-S4.

296.131	Gavin Simpson	Earthworks	General	Support	Support the rules, objectives and policies overall especially EW(Q)-P1 for farm quarries, as enabling on-farm aggregate use benefits the environment by reducing road wear and transport emissions.	Seeks to retain as notified.
296.132	Gavin Simpson	Earthworks	EW(Q)-P4 Existing quarries Enable the continued operation of existing lawfully established	Support	Support the protection of existing quarries beyond existing use rights, as considers it is critical to avoid excessive consent barriers that could threaten their continued operation, similar to the challenges faced by landfills.	Seeks to retain as notified.
296.133	Gavin Simpson	Earthworks	EW(Q)-R1 Farm quarry General Rural Zone Special Purpose Zone - Macraes Mining Activ	Support	Support with modification, as considers the current restriction on quarrying in sensitive environments is too broad and prevents the benefits of farm quarrying across much of the district. Considers the rule should be proportionate to the scale limits already in place and earthworks in sensitive environments are managed by other chapters.	Seeks to amend as follows: PER-6 The farm quarry is not located within ~~a sensitive environment or within~~ the Coastal Environment or Coastal Natural Hazard overlays.
296.134	Gavin Simpson	Earthworks	EW(Q)-R4 Quarrying activities (excluding farm quarry and restricted use quarry) Special	Support	Support with modification for consistency, as the current daily extraction limit of 100m3 is inconsistent with the allowed number of heavy vehicle trips in (CON-4).	Seeks to amend as follows: CON-3 The quantity of aggregate extracted is limited to ~~100m3~~200m3day; and
296.135	Gavin Simpson	Earthworks	General	Support	General support but considers that quarrying activities currently captured by the mining definition should instead be managed under quarrying provisions to ensure protection for existing quarries.	Seeks to retain as notified but with changes to mineral definition as submitted.
296.136	Gavin Simpson	SCHED5 – Schedule of Sites and Areas of Significance to Maori	ID ref Name Description and Values SASM016 Te Awamoko Te Awamako	Oppose	Oppose in part Schedule 5 The property is encumbered with the following SASM overlays: SASM015, SASM016 [refer to original submission for full reasons]	[Refer to original submission for relief sought]
296.137	Gavin Simpson	Ecosystems and Indigenous Biodiversity	General	Oppose	Oppose the chapter in part - considers proceeding with identifying new SNAs before the government's review and changes to the NPS-IB will create unnecessary and repeated requirements for landowners and the community, especially given the current suspension of council obligations to identify new SNAs until October 2027.	Seeks to retain the existing policy and rule framework for managing indigenous biodiversity in the ODP and implement only the requirements of the NPS-IB where SNAs have already been identified by the current/operative district plan. Seeks to defer the wider chapter review until there is more certainty from government and until such time that the review of the NPS-IB has occurred.
296.138	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-O1 Halt the decline of indigenous biodiversity Halt the decline of the Waitaki Dist	Oppose	Oppose in part, supporting the management of indigenous biodiversity in line with national direction, but seek amendment to focus maintenance and enhancement efforts on significant habitats and fauna, rather than requiring resource-intensive calculations across all zones. Considers the objective should prioritize consistency with national policy and target significant areas for enhancement where appropriate.	Seeks to amend as follows: ~~Halt the decline~~Manage of the Waitaki District's indigenous biodiversity ~~so there is at least no overall loss, including between species and ecosystems,~~ by maintaining and, where appropriate, enhancing indigenous biodiversity, in areas of mapped significant

						indigenous habitats and significant fauna (Significant Natural Areas)~~and to achieve this~~by: 1. protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity while providing for the social, cultural and economic wellbeing of people and communities now and in the future; and 2. recognising the mana of takata whenua ~~as~~to exercise kaitiaki ~~of~~in relation to maintaining, enhancing and restoring indigenous biodiversity; and 3. recognising people and communities, including landowners, as guardians of indigenous biodiversity.
296.139	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-O2 Identify and protect Significant Natural Areas Areas identified as Significant Natu	Oppose	Oppose in part, seeking modification for clarity and consistency with ECO-O1, and to ensure the objective focuses on the purpose of identifying SNAs, involves transparent partnership with landowners, and does not discourage new indigenous plantings. Considers SNAs should only be identified where indigenous biodiversity already exists as of March 1,2025and the process should recognise the role of sustainable land uses in maintaining significant values and avoid duplicating efforts or undermining trust with landowners.	Seeks to amend as follows: ECO-O2 Identify ~~and protect~~Significant Natural Areas ~~Areas identified as Significant Natural Areas are protected to ensure no net loss of indigenous biodiversity or indigenous biodiversity values as a result of land use activities.~~Work with people and communities, including mana whenua and land owners, to identify Significant Natural Areas of indigenous biodiversity established in accordance with the NPS-IB.
296.140	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-O3 Restore or enhance Significant Natural Areas Significant Natural Areas are resto	Support	Support in part, agreeing that restoration and enhancement should be encouraged where appropriate, but also emphasising the need to allow appropriate development where area values can be maintained, as many existing land management practices have already supported significant indigenous habitats and fauna.	Seeks to amend as follows: Existing mapped Significant Natural Areas are restored or enhanced, where appropriate and provision is made for the appropriate subdivision, use and development where the values of the area can be maintained.
296.141	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-P1 Evaluation of Significant Natural Areas Identify the ecological significance of	Oppose	Considers ECO-P1 should be deferred until the government review of the NPS-IB is complete.	Seeks for the deletion of ECO-P1 [refer to original submission for full relief sought] If ECO-P1 is not deleted, seeks to amend as follows: Work with mana whenua and land owners to identify the ecological significance of indigenous vegetation and habitats of indigenous fauna established before 1st March 2025 using; ~~1. the criteria contained in APP5 – Criteria for identifying areas that qualify as Significant Natural Areas (SNA); or~~ 1. The criteria in the NPS IB; or 2. in the case of Crown owned land, Clause 3.8(8) of the National Policy Statement on Indigenous Biodiversity and: ~~3. where they are known and meet the criteria to be SNA's, list them in SCHED6 Significant Natural Areas and on the Planning Maps;~~ ~~3. where they are not known,~~applying the criteria through the resource consent process, notice of requirement, outline plan, or other planning processes, to determine an area's significance; and 4. if a new Significant Natural Area is identified as a result of a

						resource consent application, include the SNA in SCHED6 – Significant Natural Areas in the next appropriate plan review or plan change notified by Waitaki District Council.
296.142	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-P2 Protection of Significant Natural Areas Except as provided for in clause 2 belo	Support	Support in part, with modification to split into simpler policies for clarity and ensuring sustainable land uses can continue alongside SNAs where effects are managed so landowners can maintain pest control and reinvestment in significant natural areas.	Seeks to amend as follows: 1. Except as provided for in clause 2 below, protect Significant Natural Areas listed in SCHED6 – Significant Natural Areas by: a. ensuring the following adverse effects are avoided, remedied or mitigated on the: i. loss of ecosystem representation and extent. .... 2.~~The~~Manage any adverse effects of subdivision, use and development on identified SNA's ~~shall be managed~~in accordance with 1.b. above only, in relation to the following activities: a. the new subdivision, use or development is required for the purposes of any of the following: i. construction or upgrade ~~(if the upgrade does not meet the requirements of clause 3.15(2) of the National Policy Statement on Indigenous Biodiversity)~~of specified infrastructure that provides significant national or regional public benefit: or ... v. there is a functional need or operational need for the new subdivision, use or development to be in that particular location; and ~~vi.~~ there are no practicable alternative locations for the new subdivision, use or development.
296.143	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-P3 Appropriate activities within Significant Natural Areas Enable limited - earthw	Support	Support in part - [No specific reason given]	Seeks to amend as follows: Enable limited - ... 3. Is for a lawfully established activity; or 4. The activity as a functional need to be located in the area; or 5. The activity has no more than minor adverse effects on the significant indigenous vegetation of fauna or habitat.
296.144	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-P4 Supporting the maintenance, restoration and enhancement of indigenous biodiversity	Support	Support in part, seeking amendments to recognise that different areas may require different management approaches, that primary production can benefit indigenous biodiversity, and that eco-sourced planting should only be required where justified. Also notes that integrated management across administrative boundaries can only be encouraged, not enforced.	Seeks to amend as follows: ... 3. encouraging, ~~or where appropriate requiring,~~ the use of eco-sourced indigenous plantings where it is available; ~~4.ensuring it is managed~~encourage management in an integrated way, within, and across administrative boundaries; 5. giving effect to the decision-making principles set out in Clause 1.5 of the National Policy Statement on Indigenous Biodiversity;

						6. recognising that maintaining indigenous biodiversity ~~requires~~can be achieved by: a. the maintenance and ~~at least~~no overall reduction of ~~all~~the following: ... 7. promoting increased indigenous vegetation cover in both urban environments and non-urban environments where appropriate; 8. requiring that significant adverse effects of activities on indigenous biodiversity (outside of SNA's or on specified Māori land) are managed by applying appropriate thresholds for indigenous vegetation clearance which was established after 1st March 2025, and where these are not met, by applying the biodiversity effects management hierarchy. 9. Recognising the benefits of farm management practices and active management of indigenous biodiversity including voluntary animal and plant pest and stock control and/or formal legal protection.
296.145	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-P5 National priorities for protection Recognise the following national priorities f	Support	No specific reason given.	Seeks to retain as notified.
296.146	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-P6 Impacts of climate change on resilience of ecosystems Take into account the potenti	Support	Support in principle but suggests modifications to align with the NPS-IB by focusing on considering specific, known effects of climate change rather than speculative future impacts.	Seeks to amend as follows: ~~Take into account the potential future impacts~~Consider the effects of climate change to promote resilience of indigenous biodiversity to climate change:
296.147	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-P7 Providing for the relationship of takata whenua with indigenous biodiversity Pro	Support	No specific reason given.	Seeks to retain as notified.
296.148	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-P8 Indigenous vegetation on urban environment allotments Recognise that indigenous	Support	Support with a modification to include ‘domestic curtilage’ as defined in the plan, to ensure properties with septic tanks that don’t meet the ‘urban environment allotment’ definition aren’t unnecessarily subject to the ECO chapter’s stricter requirements.	Seeks to amend as follows: Indigenous vegetation on domestic curtilage ~~urban environment allotments~~ Recognise that indigenous vegetation on domestic curtilage ~~urban environment allotments~~is not protected, unless specifically scheduled in the plan as a Significant Natural Area or Notable Tree.
296.149	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-P9 Precautionary approach Adopt a	Support	No specific reason given	Seeks to retain as notified.

			precautionary approach to considering the adverse			
296.150	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-P10 Provision for maintenance of improved pasture for primary production where it may affe	Support	Support with modifications to improve clarity by removing the subjective requirement for 'adequate evidence' of regular pasture maintenance, as the definition of pasture already implies this. Also consider that the clause excluding improved pasture that has become an SNA is unnecessary and circular, since such areas are already protected under SNA provisions.	Seeks to amend as follows: Allow for the maintenance of improved pasture to continue where: 1~~.there is adequate evidence to demonstrate that~~ the maintenance of improved pasture is part of a regular cycle of periodic maintenance of that pasture; 2. any adverse effects of the maintenance of improved pasture on an identified SNA are no greater in intensity, scale, or character than the effects of activities previously undertaken as part of the regular cycle of periodic maintenance of that pasture; ~~3. the improved pasture has not, itself, become an SNA;~~ ~~4. the land is not an uncultivated depositional landform; and~~ 5. the maintenance of improved pasture will not adversely affect a threatened or at risk (declining) species.
296.151	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-P11 Highly mobile fauna In relation to habitats of highly mobile fauna: identify a	Oppose	Considers the policy should be deferred until the NPS-IB review is complete.	Seeks to delete ECO-P11. If retained, seeks modification to make it consistent with the NPS IB and prevent duplication between territorial authority and regional council [refer to original submission for full relief sought] Seeks to amend as follows: In relation to habitats of highly mobile fauna: 1.Assist the regional council to identify and manage areas outside of SNA's that support specified highly mobile fauna to maintain their populations across their natural range, and improve information and awareness around them; and 2. manage the adverse effects of activities on them, in order to maintain viable populations of specified highly mobile fauna across their natural range.
296.152	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-P12 Restoration of indigenous biodiversity In relation to restoration of indigenous	Support	No specific reason given	Seeks to retain as notified.
296.153	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-P13 Commercial forestry In relation to commercial forestry: the adverse effects of	Support	Support in part with appropriate management of commercial forestry within existing mapped SNA areas.	Seeks to amend as follows: In relation to commercial forestry: 1. the adverse effects of commercial forestry activities in any existing commercial forest on any identified SNA must be managed in a manner that: a. maintains indigenous biodiversity in the identified SNA as far as practicable; while b. providing for commercial forestry activities to continue; and 2. despite ECO-P2, any part of an identified SNA that is within an area of an existing commercial forest that is planted, or is intended to be, replanted in trees for harvest must be managed over the course of consecutive rotations of production in

						the manner necessary to maintain the long-term populations of any threatened or at risk (declining) species present in the area.
296.154	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-P14 Managing indigenous vegetation outside Significant Natural Areas Avoid signific	Oppose	Considers the policy is overly broad and imposes disproportionate cost and complexity across the district, despite the NPS-IB not requiring territorial authorities to avoid significant adverse effects on indigenous vegetation outside SNAs.	Seeks to delete the provision.
296.155	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-P15 Inappropriate activities within or near to Significant Natural Areas Prohibit t	Support	Support with modification to specify that only deliberate planting is included.	Seeks to amend as follows: Prohibit the deliberate planting of:
296.156	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-R1 Indigenous vegetation clearance outside of a Significant Natural Area listed in SCHED6	Support	Support, in particular the provision permitting indigenous vegetation clearance for existing established activities, provided appropriate thresholds or circumstances are met.	Seeks to retain as notified.
296.157	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-R2 Indigenous vegetation clearance within a Significant Natural Area listed in SCHED6 – Si	Support	Support in part, endorsing clearance of indigenous vegetation where there is a functional need within listed SNAs, but suggesting that minor breaches of permitted activity standards may not always warrant an ecological assessment and this should be reflected in the note.	Seeks to amend note as follows: Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any application made under this provision ~~must provide~~ will likely require, in addition to the standard information requirements, an Ecological Assessment, provided by a suitably qualified ecologist, that is commensurate with the scale and significance of the proposal, and meets the requirements of APP8 - ECO Chapter Information Requirements for Resource Consents.'
296.158	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-R3 Earthworks within a Significant Natural Area listed in SCHED6 – Significant Natural Are	Support	Support with modifications to improve practicality by allowing earthworks within mapped SNAs where there is a functional need, and reconsidering the 10 working days' notice requirement, which may not be feasible in cases like emergencies or weather delays. Additionally, minor earthworks exceeding permitted standards may not always justify an ecological assessment, and the note should reflect this flexibility.	Seeks to amend as follows: PER-3 Silt and sediment control measures are in place to prevent discharge of silt and/or sediment into the Significant Natural Area ~~and notice is provided to Council 10 working days prior to the commencement of works.~~ Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any application made under this provision ~~must provide~~will likely require, in addition to the standard information requirements, an Ecological Assessment, provided by a suitably qualified ecologist, that is commensurate with the scale and significance of the proposal, and meets the requirements of APP8 - ECO Chapter Information Requirements for Resource Consents.
296.159	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-R4 Exotic commercial forestry, agricultural intensification, quarrying activity or mining	Support	No specific reason given	Seeks to retain as notified with Matters of Discretion in the correct column.
296.160	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-R5 Commercial forestry, agricultural intensification,	Support	No specific reason given	Seeks to retain as notified

			quarrying activity or mining activit			
296.161	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-R6 Planting non-indigenous vegetation within a Significant Natural Area listed in SCHED6 –	Support	Support in part, noting that a blanket prohibition on planting non-indigenous vegetation within SNAs could significantly impact existing primary production, and suggesting that such activities should be considered through a resource consent process where adverse effects can be appropriately managed.	Seeks to amend as follows: ~~Planting~~Deliberate planting of new non-indigenous vegetation within a Significant Natural Area listed in SCHED6 – Significant Natural Areas Activity status: ~~Prohibited~~ Discretionary
296.162	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-R7 Planting species that result in wilding conifers within a Significant Natural Area, or	Oppose	Oppose in part - should be clarified that only deliberate planting is controlled by ECO-R6 and ECO-R7.	Seeks to amend as follows: ~~Planting~~Deliberate planting of species that result in wilding conifers within a Significant Natural Area, or within 100m of a Significant Natural Area listed in SCHED6 – Significant Natural Areas
296.163	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-S1 Indigenous vegetation clearance in highly sensitive ecological environments that are no	Oppose	Oppose ECO-S1 to ECO-S4 as considers they are overly broad without sufficientjustification, andrely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators.	[Refer to original submission for full relief sought] Seeks to amend as follows: Indigenous vegetation clearance in highly sensitive ecological environments that meet SNA criteria but are not currently identified as Significant Natural Areas Apart from maintenance of improved pasture, there ~~There~~ shall be no indigenous vegetation clearance in the following locations:
296.164	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-S2 Indigenous vegetation clearance in sensitive ecological environments that are not curre	Oppose	Oppose ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators.	[Refer to original submission for full relief sought] Seeks to amend as follows: Indigenous vegetation clearance in sensitive ecological environments that meet SNA criteria but are not currently identified as Significant Natural Areas
296.165	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-S3 Indigenous vegetation clearance in threatened land environments Indigenous veget	Oppose	Oppose ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators.	[Refer to original submission for full relief sought] Seeks to amend as follows: Indigenous vegetation clearance in threatened land environments that meet SNA criteria but are not currently identified as Significant Natural Areas.

296.166	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-S4 Indigenous vegetation clearance areas dominated by snow tussock Indigenous vegetati	Oppose	Oppose ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators.	[Refer to original submission for full relief sought] Seeks to amend as follows: Indigenous vegetation clearance areas identified as dominated by snow tussock
296.167	Gavin Simpson	Ecosystems and Indigenous Biodiversity	ECO-S5 General indigenous vegetation clearance If not addressed by ECO-S1 to ECO-S4, th	Support	Support ECO-S5 with amendments to ECO-S1 to ECO-S4.	Seeks to retain as notified
296.168	Gavin Simpson	Natural Character	General	Support	General support for the chapter with modification to riparian margin definition.	Seeks to retain as notified with amendment to riparian margin definition
296.169	Gavin Simpson	Natural Features and Landscapes	General	Support	Support in part but considers the stringent provisions applied to NFL overlays are disproportionate to the land types and the scale of coverage.	Seeks to adjust the overlays so that stringent rules apply only to landscapes that are agreed with landowners as significant or outstanding.
296.170	Gavin Simpson	SCHED7 – Schedule of Outstanding Natural Features	ONF29 Outstanding Natural Feature Awamoko Stream Valley/Valley of the Whales Fe	Support	Considers the mapped overlay areas for ONF25 are too broad, and the stringent rules applied to them are disproportionate to the actual landscape characteristics. Considers that reliance on existing use rights is problematic, especially for activities like agricultural intensification, which can lose protection if paused for a year and the plan creates a risk of locking in current land uses, as stopping an activity could trigger a new consent requirement to restart it. Also considers that remote desktop mapping is inadequate and that ground-truthing with landowners has proven more effective and led to better agreement on overlay extents. [refer to original submission for full reasons]	Seeks to amend the boundaries for ONF25 as per map provided in original submission [refer to original submission for relief sought].
296.171	Gavin Simpson	Natural Features and Landscapes	NFL-O1 Outstanding Natural Features and Landscapes Outstanding Natural Features and Landsc	Support	No specific reason given	Seeks to retain as notified
296.172	Gavin Simpson	Natural Features and Landscapes	NFL-O2 Significant Natural Features and Rural Scenic Landscapes The values of Significant	Support	Supports in part the objective to protect Significant Natural Features and Rural Scenic Landscapes but suggests values should be maintained only where appropriate.	Seeks to amend as follows: The values of Significant Natural Features and Rural Scenic Landscapes are maintained where appropriate.
296.173	Gavin Simpson	Natural Features and Landscapes	NFL-O3 Wilding conifers The impact of wilding conifers on Outstanding Natural Features and	Support	Supports in part the objective to reduce the impact of wilding conifers on landscape areas and suggests the policy should encourage reduction of these effects.	Seeks to amend as follows: Encourage the impact of wilding conifers on Outstanding Natural Features and Landscapes, Significant Natural Features, and Rural Scenic Landscapes is be reduced.
296.174	Gavin Simpson	Natural Features and Landscapes	NFL-O4 Restoration and enhancement of landscapes Outstanding Natural Features and Landscap	Oppose	Opposes the objective as currently worded, arguing that it could result in subjective assessments and requiring restoration and enhancement of landscape values may not always be practicable and suggests limiting the requirement to where practicable.	Seeks to delete NFL-O4 but seeks to amend as follows if retained: Where practicable, Outstanding Natural Features and Landscapes, Significant Natural Features, and Rural Scenic

						Landscapes are restored and enhanced, where their values listed in this plan have been lost or degraded.
296.175	Gavin Simpson	Natural Features and Landscapes	NFL-P1 Identification of Outstanding Natural Features and Landscapes In relation to the	Support	Supports in part the policy for identifying Outstanding Natural Features but recommends using the full Pigeon Bay criteria as current wording omits some of the criteria and could be misleading. Also considers the policy implies changes could occur outside of the plan change or review process.	Seeks to delete NFL-P1. If retained, seeks to include all Pigeon Bay criteria and an additional requirement to work onsite in consultation with the landowner. Seeks also to include a note that changes will only occur through normal plan change or plan review.
296.176	Gavin Simpson	Natural Features and Landscapes	NFL-P2 Identification of Significant Natural Features and Rural Scenic Landscapes In re	Support	Supports in part the policy for identifying SNF/RSL but recommends using the full Pigeon Bay criteria as current wording omits some of the criteria and could be misleading. Also considers the policy implies changes could occur outside of the plan change or review process.	Seeks to delete NFL-P2 If retained, seeks to include all Pigeon Bay criteria and an additional requirement to work onsite in consultation with the landowner. Seeks also to include a note that changes will only occur through normal plan change or plan review.
296.177	Gavin Simpson	Natural Features and Landscapes	NFL-P3 Recognise the importance of protecting natural features and landscapes Recognise:	Support	No specific reason given.	Seeks to retain as notified.
296.178	Gavin Simpson	Natural Features and Landscapes	NFL-P4 Avoiding inappropriate activities on or within Outstanding Natural Features or Landscap	Support	Supports in part the policy to avoid inappropriate activities on Outstanding Natural Features and Landscapes but considers there is ambiguity in the wording and seeks clearer discouragement of critical infrastructure in these areas and more precise identification of values.	Seeks to amend as follows: Only provide for subdivision, use and development where it: 1. protects the values identified in SCHED7 – Outstanding Natural Features and SCHED8 – Outstanding Natural Landscapes that make the natural feature or landscape outstanding; and ~~2. avoids, remedies or mitigates adverse effects on other Outstanding Natural Features and Landscapes values, including avoiding any significant loss of indigenous vegetation.~~ 2. avoids the placement of critical infrastructure within the Outstanding Natural Features and Landscapes unless there is no reasonable alternative due to the functional need for the location and the adverse effects on landscape values can be avoided or appropriately managed.
296.179	Gavin Simpson	Natural Features and Landscapes	NFL-P5 Avoiding inappropriate activities on or within Significant Natural Features and Rural S	Support	Supports the policy for Rural Scenic Landscapes and Significant Natural Features, but requests clarification that only identified values are protected, to avoid ambiguity.	Seeks to amend as follows: Only provide for subdivision, use and development in Rural Scenic Landscapes and on Significant Natural Features where it: 1. maintains ~~amenity values; and~~ the values identified in SCHED9 - Significant Natural Features and SCHED10 - Schedule of Rural Scenic Landscapes. ~~2. avoids, remedies or mitigates adverse effects on other values of Significant Natural Features or Rural Scenic Landscapes, including avoiding any significant loss of indigenous vegetation.~~
296.180	Gavin Simpson	Natural Features and Landscapes	NFL-P6 Landscape's ability to absorb change When determining a landscape's ability to abso	Support	Supports the policy but only if other landscape overlays are corrected as requested for ONF029.	Seeks to conditionally retain as notified.

296.181	Gavin Simpson	Natural Features and Landscapes	NFL-P7 Earthworks within identified natural features and landscapes When determining if ea	Support	Supports the policy but only if other landscape overlays are corrected as requested for ONF029 [ONF025 - refer to submission point 298.169].	Seeks to conditionally retain as notified.
296.182	Gavin Simpson	Natural Features and Landscapes	NFL-P8 Buildings and structures on or within identified natural features and landscapes Wh	Support	Supports the policy but only if other landscape overlays are corrected as requested for ONF029 [ONF025 - refer to submission point 298.169].	Seeks to conditionally retain as notified.
296.183	Gavin Simpson	Natural Features and Landscapes	NFL-P9 Subdivision on or within identified natural features and landscapes Avoid subdivisi	Support	Supports the policy but only if other landscape overlays are corrected as requested for ONF029 [ONF025 - refer to submission point 298.169].	Seeks to conditionally retain as notified.
296.184	Gavin Simpson	Natural Features and Landscapes	NFL-P10 Wilding conifers Avoid the spread of wilding conifers by: prohibiting planting of	Support	Supports the policy but notes there is no incentive for landowners to remove wilding conifers and questions the effectiveness without council support.	Seeks to retain as notified but consider deleting clause (2) if there is no intention of following through.
296.185	Gavin Simpson	Natural Features and Landscapes	NFL-P11 Enhancement and restoration of Outstanding Natural Features and Landscapes, Significan	Support	Supports in part the policy to enhance and restore landscape areas but suggests restoration should only occur where appropriate.	Seeks to amend as follows: Support the enhancement and where appropriate the restoration of Waitaki's Outstanding Natural Features and Landscapes, Significant Natural Features and Rural Scenic Landscapes where their values have been lost or degraded by:
296.186	Gavin Simpson	Natural Features and Landscapes	NFL-R1 Buildings and structures (excluding fences) on or within Outstanding Natural Features o	Oppose	Opposes the rule as considers that small-scale farm buildings should be permitted as they are compatible with landscape management. Considers that if the ONF boundaries can be rationalised to only areas that are genuinely natural (not improved pasture) then NFL-R1 could be supported.	Seeks to amend as follows: Activity status: Permitted Where: PER-1 The structure is underground; or PER-2 The building or structure is for primary production purposes, excluding residential units; and PER-3 The building or structure does not exceed 30m2; and PER-4 The building or structure does not exceed 3m in height; and PER-5 The building or structure complies with the following standard: 1. NFL-S1

296.187	Gavin Simpson	Natural Features and Landscapes	NFL-R2 Buildings and structures (excluding fences) on or within Significant Natural Features o	Support	Supports in part but considers the rule should allow for minor buildings on Significant Natural Features as per the relief sought in submission point 298.185 or the same thresholds as in RSL.	Seeks to amend as follows: Activity status: Permitted Where: PER-1 The structure is underground; or PER-2 The building or structure is in a Rural Scenic Landscape ~~(except where it is also located on a Significant Natural Feature);~~and ...
296.188	Gavin Simpson	Natural Features and Landscapes	NFL-R3 Permanent fencing on or within Outstanding Natural Features or Landscapes, Significant	Support	Supports in part but considers deer fencing up to 2.5m high be permitted for pest management.	Seeks to amend as follows: PER-2 Any fence or gates are no more than 1.5m high (except any deer fence which can be up to ~~2m~~2.5m high).
296.189	Gavin Simpson	Natural Features and Landscapes	NFL-R4 Earthworks on or within Outstanding Natural Features or Landscapes or Significant Natur	Support	Supports in part but only if improved pasture is removed from ONFL overlays, otherwise, GRUZ earthworks rules should apply. Considers that earthworks are often needed to install tracks to give access for conservation efforts.	Seeks to conditionally retain as notified.
296.190	Gavin Simpson	Natural Features and Landscapes	NFL-R5 Primary production activities (excluding buildings, mining activities, quarrying activi	Support	Supports the policy with modifications to the definition of agricultural intensification and requests removal of improved pasture from overlays.	Seeks to amend the definition of agricultural intensification and remove improved pasture from ONFL's and SNF's. [refer to original submission for full relief sought]
296.191	Gavin Simpson	Natural Features and Landscapes	NFL-R6 Amenity planting and shelterbelts on or within Outstanding Natural Features or Landscap	Support	Supports permitting amenity planting and shelterbelts in landscape areas, provided the mapping is accurate.	Seeks to retain as notified.
296.192	Gavin Simpson	Natural Features and Landscapes	NFL-R7 Outdoor recreational activities (excluding buildings) on or within Outstanding Natural	Support	Supports the rule with modification to exclude not-for-profit and charities from the definition of commercial activities.	Seeks to amend the definition of commercial activities and seeks to add a permitted activity criteria specifically for temporary events, or an advice note advising that the Temporary Events chapter overrides NFL-R7.
296.193	Gavin Simpson	Natural Features and Landscapes	NFL-R8 Landscape restoration activities on or within Outstanding Natural Features or Landscape	Support	No specific reason given.	Seeks to retain as notified.
296.194	Gavin Simpson	Natural Features and Landscapes	NFL-R9 Flood protection structures and flood protection works on or within Outstanding Natural	Support	Supports with modification to allow all people, not just councils, to undertake flood protection works.	SeeksdeletionofPER-1 If retained, seeks to add a note to advise that emergency works are permitted under the RMA.
296.195	Gavin Simpson	Natural Features and Landscapes	NFL-R10 Plantation Forestry within or on Significant	Support	No specific reason given.	Seeks to retain as notified.

			Natural Features or Rural Scenic Landscap			
296.196	Gavin Simpson	Natural Features and Landscapes	NFL-R11 Mining activities and/or quarrying activities (excluding existing farm quarries) withi	Support	Supports with modifications to protect existing quarrying and mining activities. [refer to original submission]	Seeks to amend as follows: Mining activities and/or quarrying activities (excluding existing ~~farm quarries~~quarrying activity) within or on Significant Natural Features or Rural Scenic Landscapes [refer to original submission for full relief sought]
296.197	Gavin Simpson	Natural Features and Landscapes	NFL-R12 Mining activities and/or quarrying activities (excluding existing farm quarries) on or	Support	Supports with modifications to protect existing quarrying and mining activities. [refer to original submission]	Seeks to amend as follows: Mining activities and/or quarrying activities (excluding existing ~~farm quarries~~quarrying activity) within or on Significant Natural Features or Rural Scenic Landscapes [refer to original submission for full relief sought]
296.198	Gavin Simpson	Natural Features and Landscapes	NFL-R13 Intensive indoor primary production and intensive outdoor primary production within or	Oppose	Opposes in part and considers restricted discretionary status is more appropriate instead of non-complying as parts of the RSL may be appropriate, particularly where land is already irrigated and developed.	Seeks to amend NFL-R13 from non-complying activity status to restricted discretionary with the matters of discretion being the same as NFL-R10.
296.199	Gavin Simpson	Natural Features and Landscapes	NFL-R14 Plantation Forestry on or within Outstanding Natural Features or Landscapes All	Support	No specific reason given.	Seeks to retain as notified.
296.200	Gavin Simpson	Natural Features and Landscapes	NFL-R15 Planting species that can result in wilding conifers on or within Outstanding Natural	Support	No specific reason given.	Seeks to retain as notified.
296.201	Gavin Simpson	Natural Features and Landscapes	NFL-R16 Intensive indoor primary production and intensive outdoor primary production on or wit	Support	No specific reason given.	Seeks to retain as notified.
296.202	Gavin Simpson	Natural Features and Landscapes	NFL-S1 Standards for colours of buildings and structures in landscapes Buildings and st	Support	No specific reason given	Retain as notified
296.203	Gavin Simpson	Public Access	PA-O1 Public and customary access Public and customary access is protected, maintained,	Support	No specific reason given.	Seeks to retain as notified.
296.204	Gavin Simpson	Public Access	PA-O2 Provision of public access minimises adverse effects Public access to and along t	Support	No specific reason given.	Seeks to retain as notified.

296.205	Gavin Simpson	Public Access	PA-P1 Activities that protect and maintain public and customary access Enable activitie	Support	No specific reason given.	Seeks to retain as notified.
296.206	Gavin Simpson	Public Access	PA-P2 Mechanisms for improving public access Protect, maintain and enhance public acces	Oppose	Opposes in part the policy encouraging public access opportunities in land use applications but considers it is too ambiguous without rules and could pressure applicants and suggests limiting to esplanade reserves/strips where appropriate through a subdivision process.	Seeks to amend as follows: Protect, maintain and enhance public access by: ~~1. encouraging opportunities and mechanisms to maintain and enhance public access when a land use application provides an opportunity for access; and~~ ~~2.~~1. requiring the creation of esplanade reserves and esplanade strips where appropriate in accordance with the Subdivision Chapter, ~~with priority given~~ along the waterways listed in SCHED11 – Priority Areas for Public Access and Esplanade Strips, and lakes larger than 8 hectares.
296.207	Gavin Simpson	Public Access	PA-P3 Consideration of adverse effects on public access When considering any applicatio	Support	Supports the policy but considers it should apply only to public land, not private land.	Seeks to amend as follows: When considering any application for resource consents, have regard to any adverse effects of the proposed activity on public access routes and access points on public land.
296.208	Gavin Simpson	Activities on the Surface of Water	General	Support	General support for the chapter.	Seeks to retain as notified - except for submission points that follow.
296.209	Gavin Simpson	Activities on the Surface of Water	ASW-P2 Commercial activities Provide for commercial surface water activities where it can	Support	Supports the policy for commercial activities on water, with a request to redefine 'commercial activities' as submitted in the definitions chapter.	Seeks to redefine 'commercial activities' as submitted.
296.210	Gavin Simpson	Activities on the Surface of Water	ASW-R1 Use of vessels for a recreational activity All zones Activity status: Permitted	Amend	Considers that prescribed noise limits for vessels may create reverse sensitivity for recreational lake use as houses are built nearby and suggests protecting existing uses.	Seeks to amend as follows: PER-2 The following noise limits are not exceeded at a notional boundary established prior to 1st March 2025:
296.211	Gavin Simpson	Light	General	Support	Support for the chapter.	Seeks to retain as notified.
296.212	Gavin Simpson	Noise	General	Support	Support for the chapter.	Retain as notified
296.213	Gavin Simpson	Signs	General	Support	General support for the chapter.	Seeks to retain as notified except for the submission points that follow.
296.214	Gavin Simpson	Signs	SIGN-R7 Signs attached to a trailer, vehicle or vessel All zones Activity status: Non	Amend	Considers that the rule controlling signs on vehicles/trailers is ambiguous and may cause arbitrary decision-making and suggests clarifying exemptions for company vehicles and business operations.	Seeks to amend as follows: This rule does not apply to: 1.~~an advertising~~ sign painted or adhered directly onto company/fleet vehicles or trailers ~~which is incidental to the primary use of that vehicle or trailer;~~or

						2. an advertising sign painted or adhered directly onto company/fleet vehicles or trailers ~~which are used in the day-to-day operation of that business;~~or 3. businesses operating from a vehicle. ~~truck or caravan such as food vendors.~~
296.215	Gavin Simpson	Temporary Activities	General	Support	Support for chapter with modification to remove the word 'light' from 'light aircraft' as this is not defined. Also refer to submission point on definitions chapter related to 'temporary activities'.	Seeks to replace ‘helicopter’ and ‘light aircraft’ with ‘aircraft' throughout the chapter.
296.216	Gavin Simpson	Temporary Activities	TEMP-R6 Temporary helicopter and light aircraft take-offs and landings, excluding Ōamaru Airpo	Support	Considers that 'helicopter' is not a defined term and should be replaced with 'aircraft' [refer to submission point on definitions chapter related to 'temporary activities']	Seeks to replace ‘helicopter’ and ‘light aircraft’ with ‘aircraft' throughout the chapter.
296.217	Gavin Simpson	General Rural Zone	GRUZ-O1 Purpose of the General Rural Zone The General Rural Zone provides for primary p	Support	Support the purpose of the general rural zone for primary production and that the rural zone provides vital socio-economic benefits to the District.	Retain as notified
296.218	Gavin Simpson	General Rural Zone	GRUZ-O2 Character of the General Rural Zone The character of the General Rural Zone rem	Support	Support while recognising that odours are managed by the regional council. Support that primary production contributes to open character and maintenance of rural landscapes, and that a degree of built form is necessary to support the ongoing productivity of the rural zone.	Retain as notified.
296.219	Gavin Simpson	General Rural Zone	GRUZ-O3 Highly productive land The value and long-term benefits of using highly product	Support	Support - managing highly productive land is important to retain and support primary production in the rural environment, particularly where land is identified as being highly productive.	Retain as notified.
296.220	Gavin Simpson	General Rural Zone	GRUZ-O4 Rural amenity values A range of activities anticipated in the General Rural Zon	Support	Support for objective but considers there should be clearer guidance or a definition of rural amenity values.	Seeks to define 'rural amenity values' as follows: include; open space, primary production, low population and building density, pastoral and arable character interspersed with indigenous biodiversity, relative quietness compared to urban areas, and connection to land for cultural, recreational and historic reasons.
296.221	Gavin Simpson	General Rural Zone	GRUZ-O5 Business development in rural areas Rural areas are retained for primary produc	Support	Support - recognition is important for enabling appropriate rural-based business activities that complement the zone’s purpose.	Retain as notified
296.222	Gavin Simpson	General Rural Zone	GRUZ-P1 Protection of highly productive land Protect highly productive land for use by	Support	Support - important that identified highly productive land is protected for primary production.	Retain as notified.
296.223	Gavin Simpson	General Rural Zone	GRUZ-P2 Development in the General Rural Zone Maintain the rural character in the Gener	Support	Support for intent to maintain rural character while allowing flexibility for ancillary activities and existing uses, encouraging appropriate indigenous planting, and enabling quality staff housing and additional dwellings and recognising the diverse residential needs of rural operations without compromising housing standards.	Seeks to amend as follows: ... 4. encouraging the maintenance and enhancement of existing, and the planting of new,

						indigenous vegetation where appropriate; and 5. providing for conservation activities; and 6. recognising and providing for lawfully established rural activities and minimising reverse sensitivity effects on primary production and ancillary activities of new development in the General Rural Zone; and 7. providing for a ~~single~~ minor residential unit on sites to facilitate residential choice and flexibility ~~while ensuring that the minor residential unit is subservient to the principal residential unit on the site.~~ 8. providing for multiple residential units on large sites to facilitate staff accommodation while ensuring building density is appropriate for the General Rural Zone.
296.224	Gavin Simpson	General Rural Zone	GRUZ-P3 Design of development in rural areas Ensure that new development is well design	Support	Support for intent to ensure new development is appropriate for the environment and buildings and structures are necessary to support primary production.	Retain as notified
296.225	Gavin Simpson	General Rural Zone	GRUZ-P4 Maintenance of clear urban, rural lifestyle and rural areas Maintain a clear di	Support	Support intent where there is a distinguishment of urban and rural environments but encourage flexibility for primary production activities on the rural fringe where adverse effects can be appropriately managed.	Seeks to amend as follows: Maintain a clear distinction between urban, rural lifestyle and rural areas through the use of clear land use zones and avoidance of ad-hoc subdivision where growth to Settlement or Rural Lifestyle zones has not been planned for unless the adverse effects can be avoided, remedied or mitigated.
296.226	Gavin Simpson	General Rural Zone	GRUZ-P5 Intensive primary production Provide for intensive indoor primary production an	Support	Support as important that provision is made for intensive primary production in the rural zone where effects can be appropriately managed.	Retain as notified
296.227	Gavin Simpson	General Rural Zone	GRUZ-P6 Integration of primary production with natural and cultural values Recognise th	Support	Support but seeks clarification that sensitive values do not apply across the entire GRUZ zone and recommend limiting specialist reports to identified overlays, and advocate for enabling new primary production activities.	Seeks to amend as follows: Recognise the importance of the identified landscape, heritage, biodiversity and mana whenua values and provide for continued and new primary production in these areas while avoiding, remedying or mitigating any adverse effects on the values.
296.228	Gavin Simpson	General Rural Zone	GRUZ-P7 Intensive primary production and extractive industries in close proximity to settlemen	Support	Support intent that any new primary production and extractive industries avoid adverse effects on existing settlements.	Retain as notified.
296.229	Gavin Simpson	General Rural Zone	GRUZ-P8 Energy and resource efficiency Encourage minimisation of energy and water use a	Support	Support intent to promote energy and resource efficiency where appropriate, but notes that the Energy chapter lacks sufficient permissiveness to effectively implement the policy.	Seeks to amend as follows: Encourage minimisation of energy and water use and the use of low impact design such as optimal site layout, passive solar design, solar power and water heating, and greywater recycling for any new development, where appropriate.

296.230	Gavin Simpson	General Rural Zone	GRUZ-P9 Outline Development Plans Provide for any substantial development extension of	Support	Support with clarification that recreational, heritage, and ecological values should be limited to those identified in the plan to avoid unnecessary reporting, and suggest using covenants or separation distances to manage adverse effects on new dwellings near the General Rural Zone.	Seeks to amend as follows: ... c. retains and supports the relationship to, and where possible enhances, identified recreational, heritage and ecological features and values; and d. is co-ordinated with the delivery of appropriate infrastructure; and e. achieves a high level of amenity; and f. specifies covenants and/or provides a sufficient separation distance of habitable buildings with the General Rural Zone to minimise the potential for reverse sensitivity effects.
296.231	Gavin Simpson	General Rural Zone	GRUZ-R1 Building activity General Rural Zone Activity status: Permitted Where: PER-	Support	Support rule to provide for building activity in the rural zone and default to restricted discretionary where compliance cannot be achieved.	Retain as notified.
296.232	Gavin Simpson	General Rural Zone	GRUZ-R2 Primary production (excluding carbon forestry otherwise provided for in GRUZ-R18, mini	Support	Support rule advocating for the protection of existing mining and quarrying activities in the General Rural Zone, and affirm that primary production is appropriately located within this zone.	Seeks to amend as follows: Primary production (excluding carbon forestry otherwise provided for in GRUZ-R18, new mining activity, new quarrying activities, new intensive indoor primary production and new intensive outdoor primary production)
296.233	Gavin Simpson	General Rural Zone	GRUZ-R3 Amenity planting and shelterbelts General Rural Zone Activity status: Permitt	Support	Support with amendments to clarify that PER-1 may overly restrict amenity planting due to broad pest species criteria, and that PER-2 should regulate actual effects rather than speculative ones.	Seeks to amend as follows: PER-1 The amenity planting or shelterbelt does not involve planting of species that are, ~~or can become,~~ pest species as identified in any Regional Pest Management Plan; and PER-2 The amenity planting ~~will~~ does not shade any existing adjoining residential unit between the hours of 9:00am and 4:00pm, or any formed public road between 10:00am and 2:00pm, on the shortest day of the year; and ...
296.234	Gavin Simpson	General Rural Zone	GRUZ-R4 Residential activity General Rural Zone Activity status: Permitted Activity	Support	No specific reason given	Retain as notified
296.235	Gavin Simpson	General Rural Zone	GRUZ-R5 Residential unit General Rural Zone Activity status: Permitted Where: PER-1	Support	No specific reason given	Retain as notified
296.236	Gavin Simpson	General Rural Zone	GRUZ-R6 Accessory building General Rural Zone Activity status: Permitted Activity s	Support	No specific reason given	Retain as notified

296.237	Gavin Simpson	General Rural Zone	GRUZ-R7 Minor residential unit General Rural Zone Activity status: Permitted Where:	Support	Support in part, recommending it apply only to smaller sites, with staff housing for larger farms permitted through other provisions to ensure adequate and appropriate accommodation for rural workers.	Retain as notified
296.238	Gavin Simpson	General Rural Zone	GRUZ-R8 Visitor accommodation General Rural Zone Activity status: Permitted Where:	Support	Support but recommend amending the five-person limit to better reflect actual building capacity and accommodate larger groups, such as tour parties, where adverse effects can be appropriately managed.	Seeks to amend as follows: PER-1 The visitor accommodation is limited to homestays accommodating no more than ~~5~~ 10 visitors at any one time; and
296.239	Gavin Simpson	General Rural Zone	GRUZ-R9 Home business (excluding primary production activity) General Rural Zone Acti	Support	Support for enabling employment and entrepreneurialism in the rural zone, noting that effects like noise and visual impact are typically well managed through existing provisions, and recommend flexibility for outdoor storage and activities, with screening requirements clearly defined and not overly restrictive.	Seeks to amend as follows: ~~PER-1~~ ~~No more than 40m2 of the gross floor area of all buildings on the site is used for the home business; and~~ ~~PER-2~~PER-1 No more than one full time employee, or equivalent, ~~engaged in~~ working at the site of the home business, resides off-site; and ~~PER-3~~PER-2 No more than 2 heavy vehicle movements, and a total of 20 vehicle movements are generated in a 24-hour period for the home business; and ~~PER-4~~PER-3 Any on-site storage of materials associated with the home business is undertaken within buildings on the site, or is screened to a height of at least 1.2m from adjoining roads and sites; and ~~PER-5~~PER-4 The manufacturing, altering, repairing, dismantling or processing of any goods, or articles associated with the home business, take place within a building or is screened to a height of at least 1.2m from adjoining roads and sites.
296.240	Gavin Simpson	General Rural Zone	GRUZ-R10 Intensive indoor primary production and intensive outdoor primary production G	Support	Support with modifications to avoid duplication of effluent consent requirements already managed by the Regional Council, and recommend aligning any remaining provisions with Regional Council's 150m notification threshold.	Seeks to amend as follows: PER-2 1. housed pigs are located no closer than 500m to a property boundary; and ~~2. no disposal or storage of effluent within 500m of a residential unit on any other site; and~~ 3. no intensive indoor primary production or intensive outdoor primary production of pigs occurs within ~~2 kilometres~~ 150m of a Residential, Settlement, or Open Space Zone; or PER-3 ...

						~~2. no disposal or storage of effluent within 500m of a residential unit on any other site; and~~ 3. no intensive indoor primary production or intensive outdoor primary production of poultry occurs within ~~2 kilometres~~ 150m of a Residential, Settlement or Open Space Zone; or PER-4 For intensive indoor primary production or intensive outdoor primary production of any other species, there is: ~~1. no disposal or storage of effluent within 500m of a residential unit on any other site; and~~ 2. a setback of at least ~~2 kilometres~~ 150m from a Residential, Settlement or Open Space Zone.
296.241	Gavin Simpson	General Rural Zone	GRUZ-R11 Recreational activity General Rural Zone Activity status: Permitted Activi	Support	No specific reason given	Retain as notified
296.242	Gavin Simpson	General Rural Zone	GRUZ-R12 Flood protection structures General Rural Zone Activity status: Permitted	Support	No specific reason given	Retain as notified
296.243	Gavin Simpson	General Rural Zone	GRUZ-R13 Conservation activities General Rural Zone Activity status: Permitted Acti	Support	No specific reason given	Retain as notified
296.244	Gavin Simpson	General Rural Zone	GRUZ-R14 Commercial activity General Rural Zone Activity status: Permitted Where: P	Support	Support with amendments to allow farm shops to sell a broader range of locally produced primary goods, ideally within a 100km radius, while maintaining rural character and avoiding expansion into general retail.	Seeks to amend as follows: PER-1 Retail sales are limited to: 1. food sourced from primary production activities within a 100km radius of the site ~~farming produce (including milk, fruit, vegetables, plants, flowers, or eggs) produced on the site, or honey processed on the site; or~~
296.245	Gavin Simpson	General Rural Zone	GRUZ-R15 Aeroplane airstrips and helicopter landing areas, and the use of these by aircraft	Oppose	Considers that the aircraft movement limit should be increased to 32 per month for flexibility, and that no limit should apply where sufficient setbacks ensure there are no adverse effects at the nearest boundary.	Seeks to amend as follows: PER-3 The use of the landing area or airstrip is for any other activity which results in no more than ~~8 aircraft movements per week (4 take-offs and 4 landings)~~ 32 aircraft movements per month; or PER-4 The airstrip is more than 1,000m from the nearest notional boundary under different ownership; or ...
296.246	Gavin Simpson	General Rural Zone	GRUZ-R16 Papakāika within land held under Te Ture Whenua Māori Act 1993 or within a Native Res	Support	No specific reason given	Retain as notified

296.247	Gavin Simpson	General Rural Zone	GRUZ-R17 Seasonal Worker accommodation General Rural Zone Activity status: Permit	Oppose	Supports the need for seasonal worker housing but oppose limitations that encourage sub-standard accommodation, advocating instead for flexible, self-contained, and higher-quality options that respect the dignity and needs of workers.	Seeks to amend as follows: PER-1 The minor residential unit or building ~~and/or any campsite~~ is only to be used by workers employed on the site; and PER-2 The seasonal worker accommodation is located on a site that is a minimum of 20ha; and ~~PER-3~~ ~~Any building is relocatable or able to be reconfigured to a building accessory to land-based primary production; and~~ ~~PER-4~~ ~~Any seasonal worker accommodation contains no more than one kitchen facility; and~~ PER-5 ~~Any building used for seasonal worker accommodation is no more than 125m2 gross floor area; and~~ PER-6 Any building used for seasonal worker accommodation provides for a maximum of 10 occupants; and ~~PER-7~~ ~~The maximum area used for camping as part of any seasonal worker accommodation shall be 1000m2 and be located at least 100m from any residential unit on an adjoining site.~~
296.248	Gavin Simpson	General Rural Zone	GRUZ-R18 Carbon forestry General Rural Zone Activity status: Permitted Where: PER-1	Support	Support with modifications to permit suitable indigenous species for carbon forestry, align setback rules with biodiversity provisions, correct wording around pest species, and remove unnecessary restrictions that conflict with broader plan objectives to enhance native biodiversity.	Seeks to amend as follows: PER-1 The species of planting are indigenous ~~to the ecological district in which the activity is to take place;~~ and ... PER-4 ~~4. within 10m of a Significant Natural Area; and~~ PER-5 The carbon forestry activity ~~does not involve the planting~~ avoids an increase in scale or intensity of any pest, pest agent, or organism of interest identified in the relevant Regional Pest Management Plan; and ~~PER-6~~ ~~The carbon forestry utilises no more than 50% of any site.~~

296.249	Gavin Simpson	General Rural Zone	GRUZ-R19 Rural Industry General Rural Zone Activity status: Restricted Discretion	Support	Support with more permissive settings to reflect the functional and operational needs of rural industries, noting that site design and infrastructure are developer decisions and that adverse effects are already managed through other chapters in the plan.	Seeks to amend as follows: Activity status:~~Restricted Discretionary~~ Permitted Where: PER-1 The activity is not a potentially high-impact industrial activity. Note: consent may be required under the Transport chapter. ~~Matters of discretion are restricted to:~~ ~~1. the suitability of the location, site design and layout; and~~ ~~2. the intensity and scale of the activity; and~~ ~~3. the extent of adverse effects on existing or permitted activities; and~~ ~~4. the extent of adverse effects on the safe and efficient operation of the road network, and suitability of onsite loading, manoeuvring and access; and~~ ~~5. the provision of infrastructure to service the activity.~~
296.250	Gavin Simpson	General Rural Zone	GRUZ-R20 Papakāika where not otherwise provided for under GRUZ-R16 General Rural Zone	Support	No specific reason given	Retain as notified
296.251	Gavin Simpson	General Rural Zone	GRUZ-R21 Community facility General Rural Zone Activity status: Discretionary Activ	Support	No specific reason given	Retain as notified
296.252	Gavin Simpson	General Rural Zone	GRUZ-R22 Industrial activity General Rural Zone Activity status: Discretionary Acti	Support	No specific reason given	Retain as notified
296.253	Gavin Simpson	General Rural Zone	GRUZ-R23 Any other activity not provided for as a permitted, restricted discretionary, non-com	Support	No specific reason given	Retain as notified
296.254	Gavin Simpson	General Rural Zone	GRUZ-R24 Retirement village General Rural Zone Activity status: Non-Complying Activ	Support	No specific reason given	Retain as notified
296.255	Gavin Simpson	General Rural Zone	GRUZ-R25 Educational facility General Rural Zone Activity status: Non-Complying Act	Oppose	Opposes the non-complying activity status for schools in rural zones and considers that their rural character typically minimises reverse sensitivity risks and that access to education should be balanced with protecting primary production.	Seeks to amend the activity to a permitted activity with appropriate setbacks for buildings for the educational facility or restricted discretionary.
296.256	Gavin Simpson	General Rural Zone	GRUZ-S1 Residential site density The maximum density of residential units on any site	Support	No specific reason given	Retain as notified
296.257	Gavin Simpson	General Rural Zone	GRUZ-S2 Maximum height All building and structures must	Support	Support GRUZ-S2 with amendment to reflect that grain silos can be up to 25m in height.	Seeks to amend as follows:

			not exceed a maximum height of			1. All building and structures must not exceed a maximum height of: ... 2.~~15m~~ 25m for grain silos; ...
296.258	Gavin Simpson	General Rural Zone	GRUZ-S3 Building coverage The building coverage for any site shall not exceed 20%. Rai	Support	No specific reason given	Retain as notified
296.259	Gavin Simpson	General Rural Zone	GRUZ-S4 Road and rail setbacks A stock loading ramp or race with its entry/exit point	Support	Support with modification to allow stock loading ramps angled to the road, provided there is at least 30m of space to accommodate full off-road parking and manoeuvring.	Seeks to amend as follows: 1. A stock loading ramp or race with its entry/exit point located facing a road, including a State Highway, shall not be located within ~~a~~ 30m ~~setback~~ from the road boundary in the direction the loading ramp faces. 2. A stock loading ramp or race with its entry/exit point running parallel or away from ~~to~~ the road is exempt from this standard.
296.260	Gavin Simpson	General Rural Zone	GRUZ-S5 Internal boundary setbacks The minimum setback of any part of a building or str	Support	No specific reason given	Retain as notified
296.261	Gavin Simpson	General Rural Zone	GRUZ-S6 Frontage fencing Any fencing within a road boundary setback or internal bounda	Support	Support with modification to exempt the curtilage of residential and minor residential units, allowing more residential-style fencing around homes while retaining appropriate rural fencing elsewhere in the zone.	Seeks to amend as follows: 1. Any fencing within a road boundary setback or internal boundary setback shall be post and netting, post and wire, or post and rail fencing. 2. Fencing of residential units and minor residential units is exempt from this standard.
296.262	Gavin Simpson	General Rural Zone	GRUZ-S7 Crop protection structures Dark green or black cloth is used for all vertical	Oppose	Opposes in part and considers there should be justification for colour and size restrictions.	Seeks to delete or provide evidence or justification for colour and size restrictions.
296.263	Gavin Simpson	General Rural Zone	GRUZ-S8 Hours of operation Any activity (other than a residential activity or visitor	Support	Support intent to limit hours for rural amenity protection but considers the matters of discretion should also address potential reverse sensitivity effects on primary production activities.	Seeks to amend as follows: Matters of discretion are restricted to: ... 2. any adverse effects on the amenity values of properties on any adjoining residential sites; and 3. any reverse sensitivity effects on primary production.
296.264	Gavin Simpson	General Rural Zone	GRUZ-S9 Servicing and firefighting water supply and access All new buildings must be c	Oppose	Oppose in part, supporting its intent to ensure buildings are appropriately serviced but recommending flexibility for farm and accessory buildings that do not require reticulated services to avoid unrealistic expectations.	Seeks to amend as follows: 1. All new residential buildings must be connected to reticulated services where these are available; and 2. All new residential buildings must comply with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PA 4509:2008 unless written approval is provided from Fire and Emergency New Zealand regarding an alternative firefighting water supply.

296.265	Gavin Simpson	Transport	TRAN-O1 On-site transport facilities and access Use and development has safe and effective	Support	No specific reason given	Retain as notified
296.266	Gavin Simpson	Transport	TRAN-O2 High trip generating use and development The safety and efficiency of the transpor	Support	No specific reason given	Retain as notified
296.267	Gavin Simpson	Transport	TRAN-O3 Transport network The transport network is effective, accessible and integrated	Support	No specific reason given	Retain as notified
296.268	Gavin Simpson	Transport	TRAN-P1 High trip generating use and development Provide for high vehicle trip generato	Support	Support with modification to clarify the term 'surrounding area' in Point 5, as it is currently vague and may lead to inconsistent interpretation.	Seeks to amend as follows: ... 5. the effect of the proposed activity on the character and amenity values of the surrounding ~~area~~ adjoining sites; and ...
296.269	Gavin Simpson	Transport	TRAN-P2 Appropriate on-site transport facilities Enable on-site transport facilities where	Oppose	Opposes the policy as it addresses only on-site effects and considers that internal site use is typically managed by landowners and industry standards, and that provisions should focus on impacts beyond the site to align with TRAN-O1 and avoid unnecessary safety risks.	Seeks to amend as follows: Enable on-site transport facilities where these: 1. meet industry standards; and 2. are of a location and design that provides for: a. public health and safety; and ~~b. the safe and efficient use of the site; and~~ c. the safe and efficient functioning of the transport network; and d. the reasonable loading and access demands generated by the use of the site; and e. the safe and effective access for firefighting purposes. ~~3. promote the uptake and use of the active transport network.~~
296.270	Gavin Simpson	Transport	TRAN-P3 Potentially appropriate on-site transport facilities Only allow for on-site tra	Oppose	Considers the policy unnecessary as relevant matters are already addressed unless they regulate internal effects. Considers it should focus solely on firefighting access and remove provisions targeting off-site effects.	Amend as follows: Only allow for on-site transport facilities that do not meet industry standards where it can be demonstrated, if applicable, that: ~~1. the design is in response to site and/or topographical constraints; and~~
296.271	Gavin Simpson	Transport	TRAN-P4 Vehicle crossings Provide for safe and efficient connections between the transp	Support	Support to the extent that it applies to new vehicle crossings.	Seeks to amend as follows: Provide for safe and efficient connections between the transport network and on-site transport facilities by requiring new vehicle crossings to roads to address:

						...
296.272	Gavin Simpson	Transport	TRAN-P5 Regionally Significant Infrastructure Recognise the social, economic, cultural	Support	Support, particularly the definition of Regionally Significant Infrastructure.	Retain as notified.
296.273	Gavin Simpson	Transport	TRAN-P6 Multi-modal and active transport Encourage activities to incorporate opportunitie	Oppose	Considers to be overly strong in wording and that cycling/pedestrian modes are more hazardous and should not be encouraged where full cycling infrastructure is not available.	Seeks to amend as follows: ~~Encourage~~ Promote activities to incorporate opportunities for multi-modal and active transport, including cycle parking and end of trip facilities if the site is served by the active transport network where it separates cyclists and pedestrians.
296.274	Gavin Simpson	Transport	TRAN-P8 Upgrading of the transport network Provide for the upgrading or development of	Support	Considers clearer guidance needed on when to respond to earthworks effects, suggesting the policy be limited to landscape and ecological values identified in overlays and chapters of the plan.	Seeks to amend as follows: ... 8. responds to site and topographical constraints including opportunities to reduce the effects of earthworks on identified landscape and ecological values; ...
296.275	Gavin Simpson	Transport	TRAN-P9 Roads as infrastructure corridors Encourage the use of roads as infrastructure	Support	No specific reason given	Retain as notified
296.276	Gavin Simpson	Transport	TRAN-P10 Road classification Classify roads according to their function and anticipated	Support	No specific reason given	Retain as notified
296.277	Gavin Simpson	Transport	General	Oppose	Considers that rural zones should be exempt from policies that may pressure developers to fund cycle and footpaths where they offer no practical benefit and seeks clarification that policies apply only to new activities, noting that technical evidence from the WDC roading department is needed to support provisions for road crossings.	Seeks to have submission points considered across all TRAN provisions and for the roading department to reply to this submission at further hearings commenting on the TRAN chapter overall.
296.278	Gavin Simpson	Transport	TRAN-R1 Vehicle crossings onto roads All zones Activity status: Permitted Where: PE	Support	Support for new vehicle crossings subject to TRAN-R1	Seeks to amend as follows: TRAN-R1 New Vehicle crossings onto roads
296.279	Gavin Simpson	Transport	TRAN-R2 Site access for activities without any on-site vehicle parking space or loading spaces	Support	Support with modifications to clarify that pedestrian and cycling access requirements should not apply in zones where vehicle travel is operationally necessary, such as due to distance.	Seeks to amend as follows: TRAN-R2 Site access for new activities without any on-site vehicle parking space or loading spaces

						PER-1 All of the following standards are complied with where relevant: 1. TRAN-S1 Pedestrian and cycling access in Residential Zones; 2. TRAN-S2 Firefighting access
296.280	Gavin Simpson	Transport	TRAN-R3 On-site parking, loading, and access All zones Activity status: Permitted W	Oppose	Considers the provision overregulates internal site effects unrelated to the transport network, particularly dairy lanes and private access already covered under TRAN-S3, and finds TRAN-S5 overly restrictive by limiting vehicle standing, queuing, and manoeuvring within a site that are inherent and internal and should not be subject to standards.	Seeks to delete TRAN-S7 and TRAN-S8 from the rule.
296.281	Gavin Simpson	Transport	TRAN-S9 Accessible parking spaces Where parking spaces are provided on site: any on-si	Support	Support subject to submissions from disability advocate organisations, particularly with reference to rural sites.	Retain as notified
296.282	Gavin Simpson	Transport	TRAN-S10 Design requirements for on-site vehicle parking spaces Where parking spaces ar	Oppose	Considers the managing of internal site effects inconsistent with TRAN-O1 and recommends it be amended to clarify that it does not apply to rural or residential zones.	Seeks to provide clarification that the standard does not apply to rural and residential zones.
296.283	Gavin Simpson	Transport	TRAN-S11 Surface of parking and loading areas The surface of all parking and loading a	Oppose	Considers that setting a low car park threshold would place undue burden on rural zones, and that regulating internal site effects is inconsistent with TRAN-O1.	Seeks to provide clarification that the standard does not apply to rural and residential zones.
296.284	Gavin Simpson	Transport	TRAN-S12 On-site cycle parking All developments, excluding residential units and prima	Amend	Considers that while TRAN-S12 excludes primary production, it should also exclude rural zones due to long travel distances and lack of separated cycleways, noting that many related standards are similarly irrelevant in rural contexts.	Seeks to provide clarification that the standard does not apply to rural zones.
296.285	Gavin Simpson	Transport	TRAN-S12 On-site cycle parking All developments, excluding residential units and prima	Oppose	Considers standard to be overly prescriptive regarding the standard of cycle parking.	Seeks to provide clarification that the standard does not apply to rural and residential zones
296.286	Gavin Simpson	Transport	TRAN-R3 On-site parking, loading, and access All zones Activity status: Permitted W	Oppose	Opposes incorporating Australian and New Zealand Standards by reference in the district plan due to their cost, copyright restrictions, external review processes, and inefficiency and considers the PDP should include locally specified standards to avoid financial barriers and regulatory outsourcing.	Seeks to use standards acceptable to the WDC roading department which are written into the plan to be freely available. Delete TRAN-R3. Alternatively, if retained sees to amend as follows All zones except Rural Lifestyle Zone, General Rural Zone, Macraes Mining Zone and Settlement Zone. PER-1 All of the following standards are complied with where relevant; 1. TRAN-S2 Firefighting access; ~~2. TRAN-S3 Service lanes, private ways, private roads, pedestrian accessways and walkways;~~ ~~3. TRAN-S4 Reverse manoeuvring;~~ ~~4. TRAN-S5 Design standards for vehicle manoeuvring areas;~~

						5. TRAN-S6 Service stations and truck stops; ~~6. TRAN-S7 On-site loading spaces for non-residential activities;~~ ~~7. TRAN-S8 Design requirements for loading and vehicle standing spaces;~~ 8. TRAN-S9 Accessible parking spaces; ~~9. TRAN-S10 Design requirements for on-site vehicle parking spaces;~~ ~~10. TRAN-S11 Surface of parking and loading areas;~~ ~~11. TRAN-S12 On-site cycle parking.~~ Matters of discretion are restricted to: 1. the matters of discretion listed in any of the standards TRAN-S2,~~TRAN-S3, TRAN-S4, TRAN-S5,~~ TRAN-S6,~~TRAN-S7, TRAN-S8,~~TRAN-S9, ~~TRAN-S10, TRAN-S11, and/or TRAN-S12~~ that are not complied with.
296.287	Gavin Simpson	Transport	TRAN-R4 Vehicle trip generating activities All zones Activity status: Permitted Whe	Support	Supports with changes to reduce the consent threshold and controlling the activity directly by the number of traffic movements rather than using proxies like gross floor area.	Retain as notified with changes to Table 6 - High Trip Generator Thresholds.
296.288	Gavin Simpson	Transport	TRAN-R5 Walkways, cycleways and shared paths which are located on public land other than a roa	Support	Support with amendment to replace the Austroads Guide with a specific standard to ensure oversight of future changes is under WDC control.	Seeks to retain as notified with changes to TRAN-S20.
296.289	Gavin Simpson	Transport	TRAN-R6 Extensions and new vehicle access tracks ancillary to infrastructure, outside of any o	Support	Support with amendment to apply within overlays as extensive coverage of the Rural Scenic and Outstanding Natural Landscapes overlays makes it overly restrictive if excluded, and considers infrastructure access should take precedence over overlay values without requiring consent or incurring additional costs.	Seeks to amend as follows: TRAN-R6 Extensions and new vehicle access tracks ancillary to infrastructure, ~~outside of any overlay~~
296.290	Gavin Simpson	Transport	TRAN-S3 Service lanes, private ways, private roads, pedestrian accessways and walkways	Support	Support if restricted to public ways only and specifies a standard rather than requiring purchase of the standard.	Seeks to amend as follows: TRAN-S3 Service lanes, ~~private ways, private roads,~~ pedestrian accessways and walkways <u>on public land.</u> 1. Service lanes, private ways, private roads, pedestrian accessways and walkways on <u>public land</u> must be designed and constructed in accordance with <u>[describe standards here]</u> ~~NZS 4404:2010 Land Development and Subdivision Infrastructure; except where Table 7 Minimum legal widths and formation requirements for private ways/vehicle access lots replaces the formation requirements of private ways for residential units detailed in NZS 4404:2010.~~
296.291	Gavin Simpson	Transport	TRAN-S5 Design standards for vehicle manoeuvring areas Areas must be provided on a sit	Oppose	Considers the standard overly restrictive by requiring all vehicle standing, queuing, and manoeuvring to occur entirely within a site, including areas inherently used for such purposes, making on-street parking non-compliant and imposing internal site controls unrelated to TRAN-O1.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. Areas must be provided on a site for vehicles to stand, queue and make all necessary manoeuvres on site without using the

						road or State Highway, ~~and without using the area provided for parking space, servicing, loading space or outdoor storage purposes;~~ and ...Matters of discretion are restricted to: 1. the safety and movement of pedestrians, cyclists, public transport and general traffic on the road corridor.
296.292	Gavin Simpson	Transport	TRAN-S7 On-site loading spaces for non-residential activities The number of loading sp	Oppose	Considers the standard inappropriate for rural contexts and that it imposes unnecessary discretion over loading needs best determined by the operator. Also considers that it relies on outdated and inaccessible standards and should instead include explicit provisions within the plan.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. The number of loading spaces for any non-residential activity must not be less than that shown in Table 8 – Minimum loading space requirements for non-residential activities below and must be provided on-site, except in the Town Centre Zone and rural zones. ... 3. Neither Clause 1 or 2 above apply to sites of less than 50m2 that are used for infrastructure purposes, or to primary production. Matters of discretion are restricted to: 1. the effective, efficient and safe operation of the transport network; and ~~2. the identified loading needs of the activity.~~
296.293	Gavin Simpson	Transport	TRAN-S8 Design requirements for loading spaces and vehicle standing spaces Loading spa	Oppose	Considers the standard inappropriate for rural conditions and imposes unnecessary discretion over loading needs. Also considers the standard relies on outdated and inaccessible standards, and should instead include clear, explicit provisions within the plan.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. Loading spaces and vehicle standing spaces required under TRAN-S5 must be designed, constructed and maintained in accordance with [produce a specific standard in the text here].~~AS 2890.2.2002 Parking facilities Part 2: Off-street commercial vehicle facilities, for the specified minimum design vehicle.~~ Matters of discretion are restricted to: 1. the effective, efficient and safe operation of the transport network; and ~~2. the identified loading and vehicle space needs of the activity.~~
296.294	Gavin Simpson	Transport	TRAN-S9 Accessible parking spaces Where parking spaces are provided on site: any on-si	Support	Support subject to submission(s) from disability advocate organisations, particularly regarding application to rural zones.	Seeks to retain with any amendments requested by disability advocate organisations and disabled people.

296.295	Gavin Simpson	Transport	TRAN-S10 Design requirements for on-site vehicle parking spaces Where parking spaces ar	Oppose	Considers the standard imposes design requirements that are unclear or unsuitable for rural and residential contexts and regulates internal site effects inconsistent with TRAN-O1.	Seeks to amend as follows: Where parking spaces are provided on a site: 1. car parking must comply with the requirements of [provide standard here] ~~AS 2890.1:2004 Parking facilities Part 1: Off-street car parking,~~ except for: a. a parking space in a garage or carport; or b. staff parking that is provided as stacked parking of no more than two vehicles, or c. parking for residential or primary production activity. ...
296.296	Gavin Simpson	Transport	TRAN-S11 Surface of parking and loading areas The surface of all parking and loading a	Oppose	Considers the standard imposes unnecessarily low thresholds and surface requirements on parking and loading areas in rural and residential zones, regulates internal site effects inconsistent with TRAN-O1, and conflicts with permitted pathways for multiple residential units.	Seeks to delete or include as advice note. Alternatively, seeks to amend as follows: 1. The surface of ~~all~~ parking and loading areas must either be: ... 2. Clause 1 does not apply where a site contains parking for ~~one~~ residential units or primary production activity.
296.297	Gavin Simpson	Transport	TRAN-S12 On-site cycle parking All developments, excluding residential units and prima	Oppose	Considers the standard inappropriately applies cycle parking requirements in rural areas where cycling is impractical and potentially unsafe, and is overly prescriptive in its design standards.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. All developments, excluding residential units and primary production, ~~must~~ should provide cycle parking at a rate of 1 cycle parking for every 10 car parking spaces provided; and 2. cycle parking ~~must~~ should meet the following minimum specifications: a. cycle parking facilities ~~must~~ should be: i. signposted or visible to cyclists entering the site; and ~~ii. located as close as possible to, and no more than 15m from at least one main pedestrian public entrance to the building/activity; and~~ iii. located so they do not impede pedestrian thoroughfares, including areas used by people whose mobility or vision is restricted; and iv. clear of vehicle parking or manoeuvring areas; ~~b. cycle parking facilities must be available during the activity's hours of operation and must not be impeded by any structure, storage of goods, landscape planting or other use; and~~ ~~c. long stay cycle parking facilities (for staff or residents) must be located:~~ ~~i. in a covered area; and~~ ~~ii. in an area where access by the general public is generally excluded.~~

						~~Note: Refer to the Austroads Bicycle Parking Facilities: Guidelines for design and installation: October 2-16 (AP-R527-16).~~ Matters of discretion are restricted to: ... 4. whether cycling is a safe method of transport to the site.
296.298	Gavin Simpson	Transport	TRAN-S13 Width and number of vehicle crossings onto roads Every lot with direct vehicl	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
296.299	Gavin Simpson	Transport	TRAN-S14 Formation and sealing of vehicle crossings All vehicle crossings onto a seale	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
296.300	Gavin Simpson	Transport	TRAN-S15 Distance between vehicle crossings and road intersections the distance betwee	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
296.301	Gavin Simpson	Transport	TRAN-S16 Sight distances from vehicle crossings Any vehicle crossing onto a road other	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
296.302	Gavin Simpson	Transport	Table 6 – High trip generator thresholds	Support	Supports the thresholds with modification to raise the lower limits, as considers there is no technical evidence supporting the current thresholds and managing effects through vehicle movements is more appropriate. Also considers that valuable services such as emergency, healthcare, education, recreation, and community facilities should be given higher permitted thresholds to reduce consent barriers and better reflect their social importance.	Seeks to incorporate management of the effects from publicly owned or funded educational facilities managed by TRAN-R8 when a road needs upgraded to meet effects from an exceeded threshold. [refer to original submission for full relief sought]
296.303	Gavin Simpson	Transport	Table 7 – Minimum legal widths and formation requirements for private ways/access lots	Oppose	Considers the table unnecessarily duplicates TRAN-S2 by applying minimum legal widths and formation requirements to private ways, manages only internal site effects, and relies on inaccessible standards without supporting technical evidence.	Seeks to amend as follows: Table 7 – Minimum legal widths and formation requirements for ~~private ways/~~access lots
296.304	Gavin Simpson	Energy	General	Oppose	Considers that the chapter does not adequately reflect the benefits and low environmental impact of renewable energy and places excessive consent burdens on activities that should be encouraged, especially those generating electricity at the point of consumption to reduce demand on large-scale infrastructure.	None specified relief sought given.
296.305	Gavin Simpson	Energy	ENG-O1 Recognising the benefits of renewable electricity generation The significant local,	Support	No specific reason given	Retain as notified
296.306	Gavin Simpson	Energy	ENG-O2 Design and location of renewable electricity	Support	No specific reason given	Retain as notified

			generation Renewable electricity ge			
296.307	Gavin Simpson	Energy	ENG-O3 Protecting the values and qualities of any overlay Waitaki District's overlays a	Oppose	Considers that not all overlays are equal and not all renewable energy methods are equal.	Seeks to amend as follows: ENG-O3 Protecting the values and qualities of ~~any~~ overlay Waitaki District's overlays are protected as far as practicable from ~~the~~ any significant adverse effects of renewable electricity generation activities.
296.308	Gavin Simpson	Energy	ENG-P1 Recognising the benefits of renewable electricity generation Recognise the local, r	Support	No specific reason given	Retain as notified
296.309	Gavin Simpson	Energy	ENG-P2 Existing activities Enable the ongoing refurbishment, maintenance and repair, an	Support	No specific reason given	Retain as notified
296.310	Gavin Simpson	Energy	ENG-P3 Effects on renewable electricity generation activities Only allow new sensitive act	Support	No specific reason given	Retain as notified
296.311	Gavin Simpson	Energy	ENG-P4 Small scale renewable electricity generation activities and investigation activities ou	Support	Supports with amendments to also enable small scale renewable electricity generation activities within overlays, particularly extensive overlays such as ONL and RSL where entire properties are affected. Considers energy-related overlays (e.g., National Grid yard, Waitaki Power Scheme) should not restrict renewable energy generation and that natural hazard overlays are generally irrelevant to renewable energy effects beyond structural limitations. Considers small-scale renewable energy generation should be enabled across all overlays, with large-scale activities controlled only within identified overlays. Also considers that the PDP should "recognise and provide for" small-scale renewable electricity generation to align with the NPS-REG.	Seeks to amend as follows: ENG-P4 Small scale renewable electricity generation activities and investigation activities ~~outside of overlays~~ ~~Enable~~ Recognise and provide for small scale renewable electricity generation activities and activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation activities, ~~where:~~ ~~1. it is of a form, location and scale that minimises adverse effects on the environment; and~~ ~~2. it is consistent with the anticipated amenity values and character of the zone; and~~ ~~3. where it is demonstrated that all adverse effects on an overlay cannot be avoided, it appropriately offsets or compensates the adverse effects.~~
296.312	Gavin Simpson	Energy	ENG-P5 Small scale renewable electricity generation activities and investigation activities in	Oppose	Considers that small-scale renewable energy generation should be provided for under the NPS-REG as its effects are minor and existing overlay chapters already manage structural impacts. Considers that discouraging such activities may lead to greater reliance on large-scale projects with more significant effects.	Seeks to delete the policy. Alternatively, seeks to amend as follows: ~~Only allow~~ Recognise and provide for small scale renewable electricity generation activities and activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation activities within an overlay where:

						1. if located on buildings, items and sites identified in SCHED2 – Historic Heritage Items, SCHED3 – Character Contributing Buildings and non-contributing buildings where the building is a character contributing building, and SCHED5 – Sites and Areas of Significance to Māori: a. its location is sympathetic to the identified values where practicable; and b. ~~any structure is not visible from any adjoining public place and~~ where practicable, is aligned with the plane of the roof where located on a roof; 2. if located within the root protection area of a tree identified in SCHED4 - Notable Trees, the work will not likely compromise the long-term health, natural life or values of the Notable Tree; ... ~~5. it is demonstrated that all adverse effects on the values of the relevant overlay cannot be avoided, it appropriately offsets or compensates the adverse effects.~~
296.313	Gavin Simpson	Energy	ENG-P6 Large scale renewable electricity generation activities Provide for large scale	Support	Considers that large scale activities have more significant effects and it is appropriate to manage them.	Retain as notified
296.314	Gavin Simpson	Energy	ENG-P7 Large scale renewable electricity generation activities in other zones and within overl	Support	Considers that large scale activities have more significant effects and it is appropriate to manage them.	Retain as notified
296.315	Gavin Simpson	Energy	ENG-P8 New technology Recognise the opportunity for new technology in renewable electri	Support	No specific reason given	Retain as notified
296.316	Gavin Simpson	Energy	ENG-P9 Decommissioning of renewable electricity generation activities Require that, during	Support	No specific reason given	Retain as notified
296.317	Gavin Simpson	Energy	ENG-R1 The operation, maintenance, and refurbishment of existing renewable electricity generat	Support	No specific reason given	Retain as notified
296.318	Gavin Simpson	Energy	ENG-R2 The operation, maintenance, and refurbishment of existing renewable electricity generat	Support	No specific reason given	Retain as notified
296.319	Gavin Simpson	Energy	ENG-R3 Small scale renewable electricity generation activities outside of an overlay Al	Support	Support but considers it should also apply within overlays subject to the provisions of the relevant chapter in that overlay.	Seeks to amend as follows: ENG-R3 Small scale renewable electricity generation activities ~~outside of an overlay~~

296.320	Gavin Simpson	Energy	ENG-R4 Investigation activities outside of an overlay All zones Activity status: Perm	Support	No specific reason given	Retain as notified
296.321	Gavin Simpson	Energy	ENG-R5 Small scale renewable electricity generation activities and investigation activities in	Oppose	Considers small-scale renewable generation should be permitted activities as they are low impact and a restricted discretionary status adds disproportionate costs that discourage such activities and conflict with the NPS-REG.	Seeks to delete the rule and manage with ENG-R3. Alternatively, seeks to amend to a controlled activity [refer to original submission for full relief sought]
296.322	Gavin Simpson	Energy	ENG-R6 Small scale renewable electricity generation activities and investigation activities wi	Support	No specific reason given	Retain as notified
296.323	Gavin Simpson	Energy	ENG-R7 Large scale renewable electricity generation activities General Rural Zone Act	Oppose	Considers that renewable energy as a non-complying activity across overlays contradicts the NPS-REG, especially where overlays are intended for energy generation, and given that adverse effects are already managed by other chapters, the activity should be (restricted) discretionary.	Seeks to amend as follows: Activity status: Restricted Discretionary [refer to original submission for full relief sought]
296.324	Gavin Simpson	Energy	ENG-R8 Other renewable electricity generation activities not otherwise provided for All	Oppose	Considers the rule is unclear in scope and appears to pre-emptively control assumed future effects without justification and this will discourage innovation and renewable energy generation contrary to the NPS-REG. Considers any necessary controls should be addressed in relevant chapters only when actual effects are known.	Seeks to delete ENG-R8 and manage the effects within the relevant zone or overlay chapter.
296.325	Gavin Simpson	Energy	ENG-S1 Small scale solar panels All zones The panel must not exceed the permitted bu	Support	No specific reason given	Retain as notified
296.326	Gavin Simpson	Energy	ENG-S2 Small scale roof mounted wind turbines All zones The turbine (including the f	Support	No specific reason given	Retain as notified
296.327	Gavin Simpson	Energy	ENG-S3 Small scale freestanding wind turbines General Rural Zone Special Purpose Zo	Support	No specific reason given	Retain as notified
296.328	Gavin Simpson	Energy	ENG-S4 Small scale hydro generators General Rural Zone Rural Lifestyle Zone Industr	Support	Supports with amendments as the 200m^2 limit is too restrictive for stored water and the dam height is better regulated under the Dam Safety Regulations 2022. Considers the matters of discretion vague, such as 'suitability of the site' and lack clarity and justification, especially when many dams relate to existing water bodies or irrigation systems.	Seeks to amend as follows: 1. The maximum surface area of any stored water solely for hydro electricity does not exceed 200m2; and 2. the maximum height of a weir or dam solely for hydro electricity does not exceed 2m; and 3. the maximum installed capacity does not exceed 4 megawatts (MW).

						Matters of discretion are restricted to: ... ~~3. the suitability of the site for the proposed activity; and~~
296.329	Gavin Simpson	Earthworks	EW(Q)-S2 Setback from a site boundary General Rural Zone Special Purpose Zone – Macra	Support	Support EW(Q)-S2 setback with modification for consistency. A 100 m setback for farm quarries is excessive given other stability requirements. Quarries have a functional need for location flexibility, which a 100 m threshold would restrict. The remaining land is on a lower terrace, likely with high groundwater and situated in paddocks.	Seeks to amend setback to 20m consistent with the set back from waterways. Seeks to amend as follows: 1.New Farm quarries and new restricted use quarries must not be located within ~~100m~~ 20m of a residential activity on an adjoining site under different ownership from that of the land on which the farm quarry or restricted use quarry is located. 2. On sites adjoining a Residential or Settlement Zone boundary, the setback shall be at least 300m from the boundary for any new quarry, including restricted use quarry and farm quarry.
296.330	Gavin Simpson	NOIC – North Otago Irrigation Company Limited	North Otago Irrigation Scheme Designation Unique Identifier NOIC-1 Designation P	Support	Support the designation.	Retain as notified
296.331	Gavin Simpson	Planning Maps	General	Amend	Oppose in part the Canterbury Flood Overlay due to elevation-based anomalies and mapping inaccuracies, particularly around Maerewhenua River, Grants Rd, Little Rd, and Dip Hill Rd, and considers that this raise doubts about the overlay's validity and consistency with known plan errors such as those at Ōmārama.	Seeks for a review of the Canterbury Flood Assessment overlay mapping.
297.1	Parkside Holdings Ltd	Strategic Direction	General	Support	Support strategic direction	retain as notified
297.2	Parkside Holdings Ltd	Definitions	Agricultural intensification in relation to the Ecosystems and Indigenous Biodiversity c	Oppose	Opposes definition of agricultural intensification including change from non-irrigated to irrigated land	remove/refine/change definition of agricultural intensification
297.3	Parkside Holdings Ltd	Definitions	Commercial activity NPS means any activity trading in goods, equipment or services. It	Oppose	commercial activities definition currently captures not-for-profit or charitable activities and could unnecessarily restrict these	Specify that commercial activities definition covers 'for profit' activities
297.4	Parkside Holdings Ltd	Definitions	Farm building means a building used for the exercise of farming activities and excludes:	Oppose	for consistency use 'primary production' activities rather than 'farm'	replace 'farm' with 'primary production' in definition
297.5	Parkside Holdings Ltd	Definitions	Farm track An un-sealed private track serving permitted agricultural or forestry activit	Oppose	Current 'farm track' definition unnecessarily restricts activities that do not harm and may benefit environmental outcomes. Should be extended to sealed tracks and consented activities	Relief sought:4.21.1. Farm track: An un-sealed or sealed private track serving~~permitted agricultural or forestry~~ primary production activities.
297.6	Parkside Holdings Ltd	Definitions	Hazardous facility means a facility or activity that involves the use, storage or dispos	Oppose	unclear	retain as notified

297.7	Parkside Holdings Ltd	Definitions	Heritage professional means a person with a degree or recognised post-graduate qualifica	Amend	'recognised' is redundant in this context	Amend definition by removing 'recognised'
297.8	Parkside Holdings Ltd	Definitions	Taoka species has the same meaning as in the National Policy Statement for Indigenous Bi	Oppose	Schedule of taoka species is not included in the plan but in another source- this creates ambiguity in provisions that refer to taoka species.	Add a schedule of taoka species (TS) that can be submitted on. Remove provisions referring to TS until a schedule is provided.
297.9	Parkside Holdings Ltd	Definitions	Intensive outdoor primary production means primary production activities involving the	Oppose	Considers that the definition is vague and open to subjective interpretation and that the terms 'regular' and 'substantially provided other than from the site concerned' should be defined.	Seeks to amend as follows: Intensive outdoor primary production means primary production activities involving the keeping or rearing of livestock, or commercial aquaculture, where the ~~regular~~ majority feed source for the production of goods is ~~substantially~~ provided other than from the site concerned... It excludes the following: .... e. Primary production activities when a drought is declared
297.10	Parkside Holdings Ltd	Definitions	Pervious surface means any part of a site which is grassed or planted in trees or shrubs	Oppose	Pervious surfaces are wider than just planted areas	Pervious surface means any part of a site which is ~~grassedor planted in trees or shrubs and is~~ capable of absorbingwater including soft landscaping, grass and planted trees orshrubs. It does not include...
297.11	Parkside Holdings Ltd	Definitions	Potentially high-impact industrial activities means industrial activities that because o	Oppose	This definition appears to capture hunting and home kill which don'thave the nature or scale to justify being defined as potentially highimpact and also septic tanks which may duplicate existing regional consent requirements. Both activities are required on farm historically and in the future. Aconsent burden would curtail provision of quality housing and lowcost food, including the harvest and processing of animals from thefarm and pests caught when hunting. [refer to original submission for full reasons]	Seeks to amend as follows: Potentially high impact industrial activities means ... 2. commercial and non-pest species meat processing, or ~~any~~ ... 10. storage and disposal of sewage, septic tank sludge, or refuse other than at the source
297.12	Parkside Holdings Ltd	Definitions	Recreational activity means the use of land and/or buildings for the purpose of active o	Oppose	Definition of *recreational activities* is circular because it includes the word *recreation*	Remove *recreation* from definition of *recreational activities*
297.13	Parkside Holdings Ltd	Definitions	Regionally significant infrastructure is: strategic land transport network and arterial	Support	support particularly with respect to irrigation and stock water schemes being included.	Retain as proposed, particularly with irrigation andstock water schemes included.

297.14	Parkside Holdings Ltd	Definitions	Repair workshop means the mechanical repair and servicing of motor vehicles (includes mo	Support	if application extends beyond LCZ it could include home and farm workshops which would be problematic	Relief sought:4.55.1. Retain as proposed (only in LCZ). Should it apply to other zones, amend as follows:4.55.3. Repair workshop means the commercial mechanical repair
297.15	Parkside Holdings Ltd	Definitions	Sensitive environment area of land contained within any of the following areas: Coa	Oppose	The district plan has no jurisdiction on airspace. The correct term for the height of land above sea level is elevation.	replace *altitude* with *elevation*
297.16	Parkside Holdings Ltd	Definitions	Riparian margin means: for land in the General Rural Zone, all landward property adjo	Oppose	20 M riparian zones are inconsistent with RMA	In GRZ amend 20 metres to 5 M, remove subclause for land outside GRZ
297.17	Parkside Holdings Ltd	Definitions	Temporary activity means activities and their ancillary buildings and structures that ar	Support	*helicopter* is not a defined term	replace *helicopter* with *aircraft*
297.18	Parkside Holdings Ltd	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	term *chemicals* is too broad define established farming activities (see below) phrase around dryland cushionfield species is confusing (delete or amend) remove reference to mob stocking as grazing can support IB	Vegetation clearance means the deliberate removal,trimming, felling, or modification of any indigenous vegetationestablished as at 1st March 2025 or the deliberate alterationof hydrological functions that support that indigenousvegetation. It includes deliberate: ... 8. the deliberate application of water, fertiliser or oversowing where itwould change the ecological conditions such that the residentindigenous plant(s) are killed by competitive exclusion, ~~includingdryland cushionfield species;~~ 9. ~~the~~ drainage of mapped wetlands or lakes; 10. ~~mob-stocking; and~~ 11. applying seed of exotic pasture.It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site;~~ .... e. non-commercial harvesting of firewood
297.19	Parkside Holdings Ltd	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	The definition of 'mineral' includes the excavation of 'industrial rocks' and 'building stone', neither of which are defined but both would be better understood to be quarried.	remove *industrial rocks* and *building stone from the definition*
297.20	Parkside Holdings Ltd	Mana whenua	General	Support	support	retain as proposed

297.21	Parkside Holdings Ltd	Mana whenua	Consultation with mana whenua	Support	While supporting that mana whenua should be able to recover costs of consultation, consider that these costs should not be met by individual applicants in relation to Section 6 matters of national importance, which would more appropriately be met by the whole community.	Remove reference to applicants being charged fees for consultation. Consultation on a memorandum of understanding should be undertaken prior to further submissions.
297.22	Parkside Holdings Ltd	Hazardous Substances	General	Support	Support the chapter and definitions as proposed.	Retain as notified
297.23	Parkside Holdings Ltd	Historic Heritage	HH-O1 Protection of historic heritage The District's historic heritage is recognised, main	Support	n/a	Retain as notified
297.24	Parkside Holdings Ltd	Historic Heritage	HH-O2 Use and adaptive re-use of historic heritage Historic Heritage Items and their herit	Support	Support HH-O2 noting that primary production is sympathetic re-use of the heritage settings where existing.	Retain as notified
297.25	Parkside Holdings Ltd	Historic Heritage	HH-P1 Recognise historic heritage Identify Historic Heritage Items and their associated	Support	Support HH-P1 with modification to recognise the land owners interestin the protection of heritage on their property. Protection of heritage more likely if owner is consulted re. heritage status and gives permission for heritage listing.	With landowner permission, identify Historic Heritage Items and their associated heritagesettings throughout the Waitaki district that warrant protection in SCHED2 – HistoricHeritage Items, and are significant in terms of one or more of the following values:....
297.26	Parkside Holdings Ltd	Historic Heritage	HH-P2 Historic heritage scheduling Classify Historic Heritage Items and their associate	Support	Support HH-P2	Retain as proposed
297.27	Parkside Holdings Ltd	Historic Heritage	HH-P3 Benefits of active use, adaptive re-use, and protection of historic heritage Recogni	Support	Support HH-P3 and HH-P4 in the context of re-use being primary production.	retain as proposed
297.28	Parkside Holdings Ltd	Historic Heritage	HH-P4 Heritage maintenance Enable the use and heritage maintenance of the Historic Heri	Support	Support HH-P3 and HH-P4 in the context of re-use being primary production.	Retain as notified
297.29	Parkside Holdings Ltd	Historic Heritage	HH-P5 Modern service attachments Enable attachments to Historic Heritage Items included	Support	Support HH-P5	retain as proposed
297.30	Parkside Holdings Ltd	Historic Heritage	HH-P6 Heritage restoration Control the heritage restoration of Historic Heritage Items	Support	support	Retain as notified
297.31	Parkside Holdings Ltd	Historic Heritage	HH-P7 Retaining historic heritage – earthquake and flooding resiliency Encourage earthquak	Support	HH-P7 support	Retain as proposed

297.32	Parkside Holdings Ltd	Historic Heritage	HH-P8 Protecting historic heritage from inappropriate heritage alterations Provide for	Support	Support HH-P8	Retain as proposed
297.33	Parkside Holdings Ltd	Historic Heritage	HH-P9 Relocation of Historic Heritage Items within or beyond their heritage setting Allow	Support	Support HH-P9	Retain as proposed
297.34	Parkside Holdings Ltd	Historic Heritage	HH-P10 Demolition or destruction of Category B Historic Heritage Items Only allow the d	Support	Support HH-P10	Retain as proposed
297.35	Parkside Holdings Ltd	Historic Heritage	HH-P11 Demolition or destruction of Category A Historic Heritage Items Avoid the demolitio	Support	Support HH-P11	Retain as proposed
297.36	Parkside Holdings Ltd	Historic Heritage	HH-P12 Buildings and structures within heritage settings Only allow new buildings and s	Support	Support HH-P12	Retain as proposed
297.37	Parkside Holdings Ltd	Historic Heritage	HH-P13 Subdivision of sites containing Historic Heritage Items Only allow subdivision o	Support	Support HH-P13	Retain as proposed
297.38	Parkside Holdings Ltd	Historic Heritage	HH-P14 Planning incentives to encourage the sustainable use of Historic Heritage Items Ass	Support	support HH-P14	retain as proposed
297.39	Parkside Holdings Ltd	Historic Heritage	HH-P15 Future consideration of historic heritage Council continues to investigate the iden	Oppose	Provision not necessary: future councils may have different priorities and plan will be reviewed in 10-year cycle anyway	Delete HH-P15
297.40	Parkside Holdings Ltd	Historic Heritage	HH-R1 Heritage maintenance on Historic Heritage Items listed in SCHED2 – Historic Heritage Ite	Support	Support HH-R1	Retain as proposed
297.41	Parkside Holdings Ltd	Historic Heritage	HH-R2 Animal grazing on sites and their heritage setting identified in SCHED2 – Historic Herit	Support	Support HH-R2 as proposed permitting grazing and maintenance of various items in the context of a working farm.	Retain as proposed
297.42	Parkside Holdings Ltd	Historic Heritage	HH-R3 Earthworks within the heritage setting of a Historic Heritage Item listed in SCHED2 – Hi	Support	Support HH-R3 as proposed permitting grazing and maintenance of various items in the context of a working farm.	Retain as proposed

297.43	Parkside Holdings Ltd	Historic Heritage	HH-R5 New buildings, structures and signs, or alterations to an existing building or structure	Support	often a heritage setting/item is a rural setting andarchaeological site where some structures are required to undertakeprimary production activity such as fences, pipes etc	*Extend list of exclusions:* Any new building, structure or signis: .... 5. is a post and wire or postand rail fence; or 6. is irrigation or stock waterinfrastructure; or
297.44	Parkside Holdings Ltd	Historic Heritage	HH-R12 Relocation of a Category B Historic Heritage Item listed in SCHED2 – Historic Heritage	Support	Support HH-R12	Retain as proposed
297.45	Parkside Holdings Ltd	Historic Heritage	HH-R13 Relocation of a Category A Historic Heritage Item listed in SCHED2 – Historic Heritage	Oppose	HH-P9 states the conditions of moving any heritage item. If the physical condition of the item will be enhanced by moving it then HH-R13 should be discretionary rather than non-complying.	change HH-R13 to discretionary
297.46	Parkside Holdings Ltd	Historic Heritage	HH-R14 Any demolition of a Historic Heritage Item listed in SCHED2 – Historic Heritage Items	Oppose	This is a council policy matter rather than a planning policy. Future councils may have other priorities. With the ten year district planning cycle HH-P15 is obsolete becausecouncil will review the plan anyway.	Relief sought: delete HH-M1
297.47	Parkside Holdings Ltd	Historic Heritage	HH-R14 Any demolition of a Historic Heritage Item listed in SCHED2 – Historic Heritage Items	Support	Support intent of HH-M4 but oppose inclusion in the district plan. Council policy rather than planning matter	Delete HH-M4
297.48	Parkside Holdings Ltd	Notable Trees	General	Support	Support for chapter.	Seeks to retain as notified.
297.49	Parkside Holdings Ltd	Notable Trees	TREE-P5 Other trimming and pruning of Notable Trees Provide for any other trimming of N	Support	Supports TREE-P5 in principle but seeks modifications to better reflect practical outcomes of tree trimming and notes that long-term impacts on tree health and natural life cannot be definitively demonstrated in advance and that likelihood is a more appropriate test. Considers that necessary trimming, such as removing diseased or dangerous limbs, may affect a tree's natural form, and therefore related standards such as TREE-S1 should be reconsidered for consistency. [refer to original submission for full reasons]	Seeks to amend as follows: Provide for any other trimming of Notable Trees where it can be demonstrated that the works do not: 1.likely compromise the long-term health of the Notable Tree; 2. compromise the identified values of the Notable Tree, listed in SCHED4 - Notable Trees; 3.likely reduce the natural life of the Notable Tree; 4. increase the risk of the Notable Tree being subject to wind damage; and 5. impact the natural shape and form of the Notable Tree more than necessary.
297.50	Parkside Holdings Ltd	Notable Trees	TREE-S1 Trimming of Notable Trees All zones The maximum branch diameter being trimm	Support	Support TREE-S1	Retain as notified
297.51	Parkside Holdings Ltd	Notable Trees	TREE-S2 Trimming or removal of Notable Trees posing a threat to people or property All	Support	Support TREE-S2	Retain as notified

297.52	Parkside Holdings Ltd	Notable Trees	TREE-S3 Trimming or removal of Notable Trees All zones The works are undertaken or	Support	Support TREE S3	Retain as notified
297.53	Parkside Holdings Ltd	Notable Trees	TREE-R1 Maintenance of the ground within the root protection area of a Notable Tree All	Support	Support TREE-R1	Retain as notified
297.54	Parkside Holdings Ltd	Notable Trees	TREE-R2 Trimming or pruning of a Notable Tree All zones Activity status: Permitted	Support	Support TREE-R2	Retain as notified
297.55	Parkside Holdings Ltd	Notable Trees	TREE-R3 Removal of a Notable Tree All zones Activity status: Permitted Where: PER-1	Support	Support TREE-R3	Retain as notified
297.56	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	General	Oppose	provisions will impact significantly on existing use rights There is a functional need to be in current location where the limestone is,and an operational need for the primary industries of North Otagobecause carting lime from other locations is expensive	Amend boundaries of SASM's 017 and 021. Have direct discussions between Parkside Holdings Ltd andmana whenua to establish a scheduled mining activityschedule in the district plan similar to Appendix 16.5.16 of theDunedin 2GP.
297.57	Parkside Holdings Ltd	SCHED5 – Schedule of Sites and Areas of Significance to Maori	ID ref Name Description and Values SASM021 Te Ana Raki (Teaneraki	Oppose	SASM021 will impose on existing use rights. Not all of the rules in the SASM chapter should applyto all SASM's -rules should only apply to SASM's where the relevant values arepresent and have not already been lost.	If the SASM can't be removed from Parkside Holding's site or a Scheduled Mining Activity regime can't be established then other provisions should specifically protect activities established prior to notification of the proposed plan to continue at the same scale and intensity
297.58	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	General	Oppose	Freshwater Farm Plans are soon to become the main planning tool for farmland through the Resource Management (Freshwater Farm Plans) Regulations 2023, and they aim to reduce the consent burden	better for farmers to plan directlywith iwi in good faith
297.59	Parkside Holdings Ltd	Mana whenua	General	Oppose	Considers there to be a conflict of interest as plan states Aukaha helped draft the provisions and will also charge for consultation on them. Considers there needs to be a clear separation between plan-making and implementation.	Seeks that farms with a certified Freshwater Farm Plan (FWFP) include a chapter on SASM management, allowing for permitted activity status. Alternatively, consultation could be provided by a Suitably Qualified Person (SQP) with relevant qualifications and experience, promoting a competitive market and reducing workload for iwi.
297.60	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	General	Oppose	Considers the uncertainty of time and cost associated with consenting, particularly under the SASM provisions should be supported by a service level agreement. Considers that some issues are better addressed through RMA reform and that many Significant Natural Areas and Natural Features and Landscapes appear to have been mapped without proper landowner engagement.	Seeks the withdrawal of the Sites and Areas of Significance to Māori, Natural Features and Landscapes, Natural Character and Ecosystems and Biodiversity Chapters until the RMA reform is complete and an MOU is in place with Aukaha detailing time and cost of consultation.
297.61	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-O1 Rakatirataka and kaitiakitaka The rakatirataka of mana whenua over their signif	Amend	Supports the intent with modification to clarify that objective is not intended to be in isolation from the landowner. Considers that kaitiakitaka can't be implemented without agreement from landowners.	The rakatiratakaof mana whenua over their significant sites and areas is recognised and they are able to exercise kaitiakitaka within these areas with agreement from the landowners.

297.62	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-O2 Protection of wāhi tūpuna values The relationship of mana whenua with wāhi tūpuna	Support	Support for objective particularly the goal of increasing community awareness of wāhi tūpuna values. Considers that landowners have historically maintained relationships with these sites without district plan provisions and regulation is not necessary to sustain mana whenua connections.	Seeks that the values for protection need to be identified in the PDP
297.63	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-O3 Preservation of tuhituhi neherā The integrity of tuhituhi neherā sites is prese	Support	No specific reasons given	Retain as notified
297.64	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-O4 Enhancement of mahika kai Mahika kai values are enhanced to support customary use.	Support	Support with modification to recognise that mahika kai values are maintained, and where appropriate, enhanced, as it may not always be possible to enhance.	Mahika kai values are maintained or, enhanced where appropriate, to support customary use
297.65	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-O5 Access and use for customary purposes Mana whenua are able to access wāhi tūpuna f	Oppose	Considers: - objective requires clarification that it does not imply a general right of access to wāhi tūpuna and that access should be with landowner permission - Trespass Act is impractical for managing access and may strain iwi–landowner relationships.	Mana whenua are able to access, where appropriate, wāhi tūpuna for customary purposes and are able to use mahika kai resources in accordance with tikaka and with landowner agreement.
297.66	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-P1 Identification of wāhi tūpuna Working with mana whenua, identify, on Planning m	Support	No specific reason given	Retain as notified
297.67	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-P2 Mana whenua involvement in resource management processes Provide for the invol	Oppose	Clarify whether rules apply only where wāhi tūpuna values remain, or even where they've been physically altered but still hold cultural significance. Considers that consultation for all activities within or near wāhi tūpuna places a significant burden on landowners and mana whenua and the policy should be more targeted, directing consultation and notification to situations where it would meaningfully support the protection or enhancement of wāhi tūpuna values.	Seeks to amend the SASM overlay to map only where the values are known to still exist. If the maps cannot be changed, seeks to amend as follows: Provide for the involvement of mana whenua in resource management processes affecting identified wāhi tūpuna by encouraging consultation and engagement with mana whenua prior to undertaking activities which will have an adverse effect on the maintenance or enhancement of ~~or applying for resource consent within or adjoining~~identified wāhitūpuna.
297.68	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-P3 Management of wāhi tūpuna Only allow or provide for land use and development in id	Support	Support with amendment to provide for the protection of existing uses	~~Only allow or provide for~~Ensure new land use and development in identified wāhi tūpuna ~~where it~~ avoids significant adverse effects, and avoids, remedies or mitigates other adverse effects, on the remaining values associated with these areas,...
297.69	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-P4 Obstruction of mauka, tuhituhi neherā and wai māori by structures Avoid the loc	Support	Support in part with a preference for clearly identifying the locations of mauka, tuhituhi neherā, and wai Māori on District Plan maps to guide where structures should be avoided. Provision should also be made for compatible structures that support land uses enhancing wāhi tūpuna values, and the policy should explicitly protect existing uses while avoiding vague terms like "or near."	~~Only allow or provide for~~Ensure new land use and development in identified wāhi tūpuna ~~where it~~ avoids significant adverse effects, and avoids, remedies or mitigates other adverse effects, on the remaining values....
297.70	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-P5 Protection of integrity of tuhituhi neherā	Oppose	Supports intent to protect tuhituhi neherā. Concerns re. assumptions in irrigation modelling used to assess impacts and considers evidence suggests water loss may be	Seeks: - to permit and encourage low-rate irrigation and discourage high-rate irrigation

			Avoid the following activities on, o		overestimated and low-rate irrigation can avoid adverse effects. Policy should acknowledge that some existing agricultural and forestry activities are compatible with these values and may continue to be so	- protection of existing uses to be explicitly provided for - to amend as follows: Avoid the following new activities on areas mapped as, ~~or in close proximity to,~~ limestone outcrops; 1.~~agricultural intensification~~ high rate irrigation;...
297.71	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-P6 Culturally incompatible activities Avoid degradation of the values of wāhi tūpu	Support	No specific reason given	Retain as notified
297.72	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-P7 Habitat restoration and enhancement Encourage restoration and enhancement of indig	Support	No specific reason given	Retain as notified
297.73	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-P8 Mahika kai activities Enable mana whenua to undertake mahika kai activities in ide	Support	Support in part with a request to clarify that it does not create a general right of access to wāhi tūpuna on private land and that access should remain subject to landowner permission. Policy should be reworded to reflect existing legal frameworks and practical considerations, ensuring respectful relationships and sustainable resource management.	Clarify that landowner permission required to undertake mahika kai. Amend: *Enable mana whenua to undertake mahika kai activities in identified wāhi tūpuna, in accordance with tikaka and with landowner agreement.*
297.74	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-P9 Access for customary purposes Maintain existing access opportunities and encourage	Support	Support in part Clarify: does not create a general right of access to wāhi tūpuna on private land, which should remain subject to landowner permission. Reword to reflect existing legal frameworks and practical considerations, ensuring respectful relationships and sustainable resource management.	Amend: *Maintain existing access opportunities and encourage enhancement of access, where appropriate, for mana whenua to identified wāhi tūpuna for customary purposes with landowner agreement.*
297.75	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-P10 Wilding conifer species Protect wāhi tūpuna from modification by wilding conifer	Support	No specific reason given	Retain as notified
297.76	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-R1 Mahika kai activities within a wāhi tūpuna identified in SCHED5 – Sites and Areas of S	Support	Support in part with modifications.	Amend: *Activity status: Permitted* *Where:* *PER-1: An agreement is reached with the landowner permitting access and use of resources.* *Activity status when compliance is not achieved: ~~Not Applicable~~ Prohibited* *Note: The provisions in this rule do not override the provisions of the Trespass Act 1980.* *There is no general right of public access across private land or right to use private resources.*

297.77	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-R2 Buildings and structures within a wāhi tūpuna identified in SCHED5 - Sites and Areas o	Oppose	Oppose in part - 200m^2 threshold lacks justification and may unnecessarily increase consent requirements, while compatible structures that support wāhi tūpuna values should be distinguished. A 6m height limit for buildings and 25m for structures such as silos is supported, and low-rate irrigation infrastructure should be permitted within 100m of limestone cliffs to avoid unintended environmental impacts. The rule should clarify restricted discretionary matters, avoid unnecessary expert assessments, and ensure access, alternatives, and enhancement requirements are practical and proportionate..	Amend as shown above
297.78	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-R3 Indigenous vegetation clearance within a wāhi tūpuna, identified in SCHED5 - Sites and	Support	Support with request to modify the rule so it does not discourage landowners from planting new indigenous vegetation, and to allow a permitted pathway for indigenous vegetation removal where landowners have certified Freshwater Farm Plans.	Amend: *PER-1 ...* *k. improved pasture* ... *PER-4* *The indigenous vegetation was planted after 1st March 2025 and complies with a certified Freshwater Farm Plan.*
297.79	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-R4 Earthworks within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significanc	Oppose	Oppose in part: excludes earthworks for permitted building platforms and would create unnecessary consent requirements for routine activities, especially where SASM overlays cover farm bases and improved pasture with no archaeological value. Either remove SASM overlays from such areas or modify rule to increase earthworks thresholds (e.g., to 3m cut and 1,000m^2 area), manage effects through permitted activity criteria, and use boundary setbacks in residential settings, thereby reducing the consent burden whilst still protecting genuinely sensitive sites.	Amend: PER-3 The permitted activity standards of EW-R1 are complied with; and PER-4 Earthworks are set back 100m from tuhituhi nehera and comply with a certified Freshwater Farm Plan; and PER-5 Earthworks are set back 20m from mahika kai resources; and PER-6 Access to mahika kai resources is not obstructed; and ... PER-9 The earthworks are associated with any permitted activity under SASM-R2. [GRZ/SETZ] Where: ~~PER-5~~ PER-10 All earthworks where they comply with the following earthworks standards where relevant: 1. EW-S1 Threshold areas [submitting change to 1,000m]. 2. EW-S2 Maximum cut depth and fill height [submitting change to 3m cut and filldepth]; and 3. EW-S4 Earthworks within 20 metres of a waterbody

297.80	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-R5 Urupā within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significance to	Support	Support for existing urupā, but request that new urupā be treated the same as cemeteries due to similar environmental effects, while acknowledging their different cultural and spiritual significance.	retain as notified
297.81	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-R6 Amenity planting and shelterbelts within a wāhi tūpuna, identified in SCHED5 – Sites a	Support	Support but considers specific provision to permit existing shelterbelts within 100m of limestone escarpments is required.	Amend: *PER-1* *The new amenity planting or shelterbelt is not located on or within 100m of a limestone escarpment.*
297.82	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-R7 Natural hazard mitigation structures within a wāhi tūpuna, identified in SCHED5 - Site	Amend	Support with modification to allow a permitted pathway for councils or private applicants to create natural hazard structures, provided iwi are consulted to ensure any permitted activity pathway addresses potential effects on cultural values.	Amend: *Activity status: ~~Restricted Discretionary~~ Permitted* *PER-1* *Fish passage is not impeded.* *Where:* *~~RDIS-1 The structures are erected by, or on behalf of, Waitaki District Council, Otago Regional Council, or Canterbury Regional Council.~~* *~~Matters of discretion are restricted to:~~* *~~1. The matters of discretion listed in SASM-R2 RDIS-1.~~* Notification: Any application made under ~~this rule~~ DIS-1 may be notified to Te Rūnanga o Moeraki.
297.83	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-R8 Agricultural intensification within a wāhi tūpuna, identified in SCHED5 - Sites and Ar	Oppose	No specific reason given	Suggest replacement for the same reasons and with the same relief sought in the Definitions section of this submission.
297.84	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-R9 Commercial outdoor recreation within a wāhi tūpuna, identified in SCHED5 - Sites and A	Amend	Amend or oppose Support if SASM's are adjusted toexclude Parkside Holdings, otherwise oppose because limits diversification options available to the landowner. Tours are an existing activity at Parkside Holdings.Agree there is justification for iwi oversight ofarchaeological sites, but if critical parts of the site is covered inSASM as proposed with the overlays on areas where tourshave a functional need to be then there will not be an alternative area for the landowners to diversify their operationwithout a costly consent process.	Amend toexclude Parkside Holdings from SASM's
297.85	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-R10 Plantation forestry activities within a wāhi tūpuna, identified in SCHED5 - Sites and	Support	No specific reason given	Retain as notified
297.86	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-R11 Mining activities, farm quarries or quarrying activities within a wāhi tūpuna, identi	Oppose	Oppose in part requesting that farm quarries be excluded from the rule and permitted with appropriate setbacks from sensitive sites, so properties mostly covered by a SASM overlay can still meet operational needs. Considers existing quarries should remain permitted, and the rule could be supported if the overlay mapping is rationalised as submitted.	Amend: New mining activities, farm quarries or quarrying activities within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significance to Māori Activity status: ~~Discretionary~~ Permitted Where:

						PER-1 The farm quarry is set back 100m from tuhituhi nehera, waterways, limestone escarpments, archaeological sites and cemeteries or urupa. ~~DIS-1~~PER-2 Gravel extraction is required for flood mitigation works. undertaken by a regional council. Notification: Any application made under NC-1~~this rule~~ may be notified to Te Rūnanga o Moeraki.
297.87	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-R12 Cemeteries or crematoria within a wāhi tūpuna, identified in SCHED5 - Sites and Areas	Support	No specific reason given	Retain as notified
297.88	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-R13 Landfills within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significanc	Support	No specific reason given	Retain as notified
297.89	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-R14 Wastewater treatment plants within a wāhi tūpuna, identified in SCHED5 - Sites and Ar	Support	No specific reason given	Retain as notified
297.90	Parkside Holdings Ltd	Sites and Areas of Significance to Maori	SASM-R15 Planting wilding conifer species within a wāhi tūpuna, identified in SCHED5 - Sites a	Support	No specific reason given	Retain as notified
297.91	Parkside Holdings Ltd	Earthworks	General	Oppose	Oppose in part noting that small-scale, occasional earthworks are essential for primary production, land management, and health and safety, and are critical to the economic and sustainable management of land and water resources.	No specific relief sought.
297.92	Parkside Holdings Ltd	Earthworks	EW-O1 Earthworks activities Earthworks activities enable people and communities, social	Support	No specific reason given	Retain as notified
297.93	Parkside Holdings Ltd	Earthworks	EW-O3 Protecting communities Earthwork activities are undertaken in a manner that maint	Support	No specific reason given	Retain as notified
297.94	Parkside Holdings Ltd	Earthworks	EW-O2 Protecting sensitive environments Indigenous biodiversity, natural landscapes, natur	Amend	Support with modification to clarify and narrow scope by defining “natural landforms,” referencing “Significant Natural Areas” for indigenous biodiversity, and aligning references to “natural landscapes” and “natural features” with Outstanding Natural Landscapes and Features, while ensuring existing earthworks in sensitive environments can continue. Considers the objective should also reference ‘Historic and	Seeks to amend: ~~Indigenous biodiversity~~Significant Natural Areas, Outstandingnatural landscapes,~~natural landforms,~~Outstandingnatural features,~~mana whenua~~and historic and cultural~~heritage~~ values are protected from the adverse effects

					Cultural Values' for clarity and efficiency and protect long-standing activities like the Oamaru Stone Quarry within sensitive environments.	ofnewearthworks.
297.95	Parkside Holdings Ltd	Earthworks	EW-P1 Enabling earthworks Enable earthworks where the scale, extent and effects are approp	Support	We particularly support EW-P1. [No specific reason given]	Retain as notified
297.96	Parkside Holdings Ltd	Earthworks	EW-P2 Protecting sensitive environments Provide for earthworks where adverse effects on th	Support	No specific reason given	Retain as notified
297.97	Parkside Holdings Ltd	Earthworks	EW-P3 Conservation activities within sensitive environments Enable earthworks that facilit	Support	No specific reason given	Retain as notified
297.98	Parkside Holdings Ltd	Earthworks	EW-P4 Primary production activities Enable earthworks that support the operational effi	Support	Support with modification to allow earthworks for installing identified infrastructure and farm buildings, as considers these are managed by existing standards and provide positive environmental effects. Considers enabling primary production activities should be maximised outside sensitive environments, which are already protected by other plan provisions.	Amend: *Enable earthworks that support the operational efficiency of primary production activities, including the construction, maintenance and repair of existing farm tracks, farm buildings, yards, irrigation systems,...*
297.99	Parkside Holdings Ltd	Earthworks	EW-P5 Construction and maintenance of farm tracks and recreational tracks Enable earthwork	Support	No specific reason given	Retain as notified
297.100	Parkside Holdings Ltd	Earthworks	EW-P6 Earthworks within the National Grid Yard Enable earthworks within the National Grid	Support	No specific reason given	Retain as notified
297.101	Parkside Holdings Ltd	Earthworks	EW-P7 The effects of earthworks Manage any earthworks to avoid, remedy or mitigate adve	Amend	Support with modification to clarify that effects should be controlled beyond the site boundary and that visual amenity and local amenity values should only apply off-site and in sensitive environments, while removing soil quality as it is a regional council matter.	Amend: *Manage any earthworks to avoid, remedy or mitigate adverse effects on the following:* *1. the stability of land, buildings and structures at or beyond the boundary of the site; and* *2. the visual amenity values of the site in a sensitive environment, and after rehabilitation; and* *~~3. natural landforms; and~~* *4. local amenity values beyond the boundary of the site; and* *5. erosion and sediment loss from the site; and* *~~6. natural hazard risk; and~~* *7. the stormwater management systems; and* *8. dust, lighting, odour, vibration, noise and traffic beyond the boundaries of the site; and* *9. soil quality.*

297.102	Parkside Holdings Ltd	Earthworks	EW-P8 Rehabilitation of disturbed ground Enable earthworks that enhance, restore or rehabi	Amend	Support with modification that restoration should not always reflect the surrounding landform and vegetation, but enhancement or rehabilitation may require different approaches such as replacing undesirable species with more suitable ones. Considers the policy should enable positive changes rather than require strict replication of existing conditions.	Amend: *Enable earthworks that enhance, restore or rehabilitate areas of disturbed ground ~~to reflect the surrounding landform and vegetation.~~*
297.103	Parkside Holdings Ltd	Earthworks	EW-R1 General earthworks located outside of a sensitive environment All zones Activit	Support	Support EW-R1 with modified standards as detailed below.	Retain rule as drafted but amend standards.
297.104	Parkside Holdings Ltd	Earthworks	EW-R2 Earthworks for repair and maintenance activities within or outside of a sensitive enviro	Amend	Support EW-R2 with the addition of construction of the sameinfrastructure and the addition of farm buildings.	Amend: Earthworks for construction, repair and maintenance activities within or outside of a sensitive environment PER-1... 10. farm buildings; and PER-3 Earthworks undertaken for the lawful establishment of: 1. farm tracks; 2. yards; 3. water supply and irrigation systems; 4. fences; 5. dams/ponds; 6. walking and cycling tracks; 7. driveways and accessways; 8. stormwater infrastructure, sediment detention ponds, culverts and stormwater drains; 9. coastal hard protection structures;
297.105	Parkside Holdings Ltd	Earthworks	EW-R3 Earthworks for the construction of farm tracks, public footpaths, public bridle paths an	Support	Support with amendment to allow wider dairy tracks (at least 6.5–8m) and accommodate larger machinery, as recommended by DairyNZ and typical for the Waitaki District.	*PER-1* *The track is associated with a permitted or lawfully established activity within the zone and does not exceed ~~4~~ 8 metres in width with an additional allowance of 1 metre either side of the track for battering;...*
297.106	Parkside Holdings Ltd	Earthworks	EW-R4 Earthworks for conservation activities within a sensitive environment All zones	Amend	Support with a higher threshold, as considers requiring consent for conservation earthworks in sensitive environments could discourage important activities like fencing SNAs or planting indigenous species.	Either permit the relevant earthworks thresholds for the underlying zone or increase the threshold within all conservation activities rules. Amend: Earthworks for conservation activities within a riparian margin or sensitive environment Activity status: Permitted Where: PER-1 ~~On any site earthworks do not exceed 25m2 in area over any 3 year period.~~ ~~PER-2~~ All of the following standards are complied with:

						1. EW-S2 Maximum cut depth and fill height; 2. EW-S3 Earthworks on sloping sites; and ~~3. EW-S4 Earthworks within 20m of a waterbody.~~ Activity status when compliance is not achieved: Restricted Discretionary Where: RDIS-1 Compliance is not achieved with ~~PER-2~~PER-1 Matters of discretion are restricted to: 1. the matters of discretion listed in any of the standards EW-S2, EW-S3 and/or EW-S4 that are not complied with. ~~Activity status when compliance is not achieved: Discretionary~~ ~~Where:~~ ~~DIS-1~~ ~~Compliance is not achieved with~~ ~~PER-1~~
297.107	Parkside Holdings Ltd	Earthworks	EW-R5 Earthworks within a riparian margin All zones Activity status: Permitted Wher	Amend	Support with modifications to clarify the distinction between regional and district council responsibilities, remove duplication in matters of discretion, permit maintenance of water supply systems, and limit consideration of cumulative effects to those specifically identified.	Amend: PER-3... c. water supply or irrigation systems; Matters of discretion are restricted to:... 2. the extent and management of adverse effects or cumulative effects on natural character of the riparian margin, including: a. the extent to which the proposed earthworks will: i. allow natural elements to dominate; and ii. introduce man-made elements to the riparian margin; and iii. affect the amenity values of the riparian margin; and iv. create disturbances that will be.... ~~ix. restrict access for mahika kai purposes; and~~ ~~3. any cumulative effects.~~
297.108	Parkside Holdings Ltd	Earthworks	EW-R6 Earthworks and land disturbance within the National Grid Yard All zones Activit	Support	No specific reason given	Retain as notified
297.109	Parkside Holdings Ltd	Earthworks	EW-R7 Earthworks within a sensitive environment All zones Activity status: Discretion	Support	No specific reason given	Retain as notified
297.110	Parkside Holdings Ltd	Earthworks	EW-S1 Threshold areas (m2) All Residential Zones Rural Lifestyle Zone Settlement Zo	Oppose	Area thresholds are inadequate for managing earthworks as they focus on the size of the activity rather than its environmental impact and effect management should take precedence over area measurement. Thresholds should be used as matters of discretion or permitted activity criteria, not rigid limits and that the current thresholds are too low, capturing routine activities like house scrapes, silage pits, and shed construction. Standards duplicate those in the NFL chapter, regarding	Seeks to remove area thresholds so they default to regional council thresholds and introduce standards or permitted activity criteria to manage the effects of earthworks directly. If threshold areas are to remain seeks to increase threshold to 1,000m2 for all zones.

					landscape effects, which are subjective and undefined outside NFL overlays.	Seeks to amend as follows: Matters of discretion are restricted to: 1. whether ~~the~~ earthworks changing the landform of a ridgeline are of a type, scale and form that is appropriate for the location and anticipated character of the zone; and 2. the management of silt, sediment and erosion on-site; and 3. impacts on ~~character and~~ amenity values beyond the site boundary, ~~natural landforms and features~~, including whether the cut face and/or any retaining structures can be concealed behind development or effectively landscaped; and 4.~~visual amenity, including~~ landscape treatment, site reinstatement and screening; and ~~5. the potential for cumulative effects on the natural form of the landscape; and~~ ... ~~Note: A landscape assessment may be required for the assessment of this standard.~~ ...
297.111	Parkside Holdings Ltd	Earthworks	EW-S2 Maximum cut depth and fill height The cut depth or fill height must not exceed 1	Amend	Considers the standard should be amended to reduce the number of consents that will be required across the district.	Seeks to increase the cut and fill to 3m. Alternatively, seeks to exclude house scrapes from the cut and fill calculations in all zones. Seeks to move the note suggesting written approval of 1.5m depth within 1.5m from neighbouring landowner so it becomes a requirement to meet the standard. Seeks to amend as follows: 1. The cut depth or fill height must not exceed ~~1.5~~ 3metres as measured vertically; and 2. Cut or fill supported by a retaining wall must be setback a distance at least equal to the height of the retaining wall. 3. Cut and fill equal to or less than 0.5m in height is exempt from this standard. 4. Cut and fill for building platforms is exempt from this standard. 5. Earthworks over 1.5m in height or depth that take place within 1.5m of a site boundary require a written approval from the adjoining landowner.
297.112	Parkside Holdings Ltd	Earthworks	EW-S3 Earthworks on sloping sites Earthworks must not take place on slopes with an ang	Support	No specific reason given	Retain as notified
297.113	Parkside Holdings Ltd	Earthworks	EW-S4 Earthworks within 20 metres of a waterbody	Support	Amend to reduce consent costs and improve clarity around when ecological or landscape reports are required.	Matters of discretion are restricted to:... 2. effects of earthworks within 5m of the waterbody on the natural

			Earthworks shall not take place withi			character and ecological values of the waterbody; and ~~3. impacts on the character and amenity values, natural landforms and features; and~~ ~~4. management of visual amenityeffects through~~ landscape treatment, site reinstatement and screening; and ~~5. the potential for cumulative effects on the natural form of the landscape.~~ Note: A site management plan may be required for consideration of the assessment matter 1. Note: An ecological report ~~and/or landscape assessment~~ may be required for consideration of matters of discretion (2),~~(3), (4) and (5)~~in EW-S4.
297.114	Parkside Holdings Ltd	Earthworks	General	Support	Support the rules, objectives and policies overall especially EW(Q)-P1 for farm quarries, as enabling on-farm aggregate use benefits the environment by reducing road wear and transport emissions.	Retain as notified
297.115	Parkside Holdings Ltd	Earthworks	EW(Q)-P4 Existing quarries Enable the continued operation of existing lawfully established	Support	Support the protection of existing quarries beyond existing use rights, as it is critical to avoid excessive consent barriers that could threaten their continued operation, similar to the challenges faced by landfills.	Retain as notified
297.116	Parkside Holdings Ltd	Earthworks	EW(Q)-R1 Farm quarry General Rural Zone Special Purpose Zone - Macraes Mining Activ	Support	Amend because current restriction on quarrying in sensitive environments is too broad and prevents the benefits of farm quarrying across much of the district. Considers the rule should be proportionate to the scale limits already in place and earthworks in sensitive environments are managed by other chapters.	PER-6 The farm quarry is not located within ~~a sensitive environment or within~~ the Coastal Environment or Coastal Natural Hazard overlays.
297.117	Parkside Holdings Ltd	Earthworks	EW(Q)-R4 Quarrying activities (excluding farm quarry and restricted use quarry) Special	Support	Support with modification for consistency, as the current daily extraction limit of 100m3 is inconsistent with the allowed number of heavy vehicle trips in (CON-4).	Seeks to amend as follows: CON-3 The quantity of aggregate extracted is limited to ~~100m^3~~ 200m^3 day; and
297.118	Parkside Holdings Ltd	Earthworks	General	Support	General support but considers that quarrying activities currently captured by the mining definition should instead be managed under quarrying provisions to ensure protection for existing quarries.	Seeks to retain as notified but with changes to mineral definition as submitted.
297.119	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	General	Oppose	Oppose entire chapter in part. Proceeding with identifying new SNAs before Government review and changes to the NPS-IB will create unnecessary and repeated requirements for landowners and the community, especially given the current suspension of council obligations to identify new SNAs until October 2027.	Retain existing policy and rule framework for managing indigenous biodiversity in the ODP and implement only NPS-IB requirements where SNAs are identified by the current/operative district plan. Seeks to defer the wider chapter review until there is further direction from Government and review of the NPS-IB has occurred.
297.120	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-O1 Halt the decline of indigenous biodiversity Halt the decline of the Waitaki Dist	Oppose	Oppose in part, supporting the management of indigenous biodiversity in line with national direction, but seek amendment to focus maintenance and enhancement efforts on significant	~~Halt the decline of~~ Manage Waitaki District's indigenous biodiversity ~~so there is at least no overall loss, including between species and ecosystems,~~by maintaining and, where appropriate,

					habitats and fauna, rather than requiring resource-intensive calculations across all zones. Considers the objective should prioritize consistency with national policy and target significant areas for enhancement where appropriate.	enhancing indigenous biodiversity, in areas of mapped significant indigenous habitats and significant fauna (Significant Natural Areas) ~~and to achieve this~~ by: 1. protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity while providing for the social, cultural and economic wellbeing of people and communities now and in the future; and 2. recognising the mana of takata whenua ~~as~~ to exercise kaitiaki ~~of~~ in relation to maintaining, enhancing and restoring indigenous biodiversity; and 3. recognising people and communities, including landowners, as guardians of indigenous biodiversity.
297.121	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-O2 Identify and protect Significant Natural Areas Areas identified as Significant Natu	Oppose	Oppose in part, seeking modification for clarity and consistency with ECO-O1, and to ensure the objective focuses on the purpose of identifying SNAs, involves transparent partnership with landowners, and does not discourage new indigenous plantings. Considers SNAs should only be identified where indigenous biodiversity already exists as of March 1,2025 and the process should recognise the role of sustainable land uses in maintaining significant values and avoid duplicating efforts or undermining trust with landowners.	ECO-O2 Identify ~~and protect~~ Significant Natural Areas ~~Areas identified as Significant Natural Areas are protected to ensure no net loss of indigenous biodiversity or indigenous biodiversity values as a result of land use activities.~~ Work with people and communities, including mana whenua and landowners, to identify Significant Natural Areas of indigenous biodiversity established in accordance with the NPS-IB.
297.122	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-O3 Restore or enhance Significant Natural Areas Significant Natural Areas are resto	Amend	Support in part, agreeing that restoration and enhancement should be encouraged where appropriate, but also emphasising the need to allow appropriate development where area values can be maintained, as many existing land management practices have already supported significant indigenous habitats and fauna.	Amend: *Existing mapped Significant Natural Areas are restored or enhanced, where appropriate and provision is made for the appropriate subdivision, use and development where the values of the area can be maintained.*
297.123	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-P1 Evaluation of Significant Natural Areas Identify the ecological significance of	Oppose	ECO-P1 should be deferred until the government review of the NPS-IB is complete.	Delete or amend as follows: Work with mana whenua and land owners to identify the ecological significance of indigenous vegetation and habitats of indigenous fauna established before 1st March 2025 using: ~~1. the criteria contained in APP5 – Criteria for identifying areas that qualify as Significant Natural Areas (SNA); or~~ 1. The criteria in the NPS IB; or 2. in the case of Crown owned land, Clause 3.8(8) of the National Policy Statement on Indigenous Biodiversity and: ~~3. where they are known and meet the criteria to be SNA's, list them in SCHED6 – Significant Natural Areas and on the Planning Maps;~~ ~~3. where they are not known,~~ applying the criteria...
297.124	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-P2 Protection of Significant Natural Areas Except as provided for in clause 2 belo	Amend	Support in part, with modification to split into simpler policies for clarity and ensuring sustainable land uses can continue alongside SNAs where effects are managed so landowners can maintain pest control and reinvestment in significant natural areas.	1. Except as provided for in clause 2 below, protect Significant Natural Areas listed in SCHED6 – Significant Natural Areas by: a. ensuring the following adverse effects are avoided, remedied or mitigated on the: i. loss of ecosystem representation and extent; ....

						2.~~The~~ Manage any adverse effects of subdivision, use and development on identified SNA's ~~shall be managed~~ in accordance with 1.b. above only, in relation to the following activities: a. the new subdivision, use or development is required for the purposes of anyof the following: i. construction or upgrade ~~(if the upgrade does not meet the requirements of clause 3.15(2) of the National Policy Statement on Indigenous Biodiversity)~~of specified infrastructure that provides significant national or regional public benefit: or ... v. there is a functional need or operational need for the new subdivision, use or development to be in that particular location~~;~~ and ~~vi.~~there are no practicable alternative locations for the new subdivision, use or development;
297.125	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-P3 Appropriate activities within Significant Natural Areas Enable limited - earthw	Amend	Support in part - [No specific reason given]	Enable limited - ... 3. Is for a lawfully established activity; or 4. The activity as a functional need to be located in the area; or 5. The activity has no more than minor adverse effects on the significant indigenous vegetation of fauna or habitat.
297.126	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-P4 Supporting the maintenance, restoration and enhancement of indigenous biodiversity	Amend	Amend to recognise that different areas may require different management approaches, that primary production can benefit indigenous biodiversity, and that eco-sourced planting should only be required where justified. Also notes that integrated management across administrative boundaries can only be encouraged, not enforced.	3. encouraging, ~~or where appropriate requiring~~, the use of eco-sourced indigenous plantings where available; 4.~~ensuring it is managed~~ encourage management in an integrated way, within, and across administrative boundaries; 5. giving effect to the decision-making principles set out in Clause 1.5 of the National Policy Statement on Indigenous Biodiversity; 6. recognising that maintaining indigenous biodiversity ~~requires~~ can be achieved by: a. the maintenance and ~~at least~~ no overall reduction of ~~all~~ the following: ... 7. promoting increased indigenous vegetation cover in both urban environments and non-urban environments where appropriate; 8. requiring that significant adverse effects of activities on indigenous biodiversity (outside of SNA's or on specified Māori land) are managed by applying appropriate thresholds for indigenous vegetation clearance which was established after 1st March 2025, and where these are not met, by applying the biodiversity effects management hierarchy. 9. Recognising the benefits of farm management practices and active management of indigenous biodiversity including voluntary animal and plant pest and stock control and/or formal legal protection.

297.127	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-P5 National priorities for protection Recognise the following national priorities f	Support	No specific reason given	Retain as notified
297.128	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-P6 Impacts of climate change on resilience of ecosystems Take into account the potenti	Amend	Support in principle but suggest modifications to align with the NPS-IB by focusing on considering specific, known effects of climate change rather than speculative future impacts.	~~*Take into account the potential future impacts*~~ *Consider the effects of climate change to promote resilience of indigenous biodiversity to climate change:*
297.129	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-P7 Providing for the relationship of takata whenua with indigenous biodiversity Pro	Support	No specific reason given	Retain as notified
297.130	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-P8 Indigenous vegetation on urban environment allotments Recognise that indigenous	Support	Support with a modification to include 'domestic curtilage' as defined in the plan, to ensure properties with septic tanks that don't meet the 'urban environment allotment' definition aren't unnecessarily subject to the ECO chapter's stricter requirements.	Indigenous vegetation on domestic curtilage ~~urban environment~~ allotments Recognise that indigenous vegetation on domestic curtilage ~~urban environment allotments~~ is not protected, unless specifically...
297.131	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-P9 Precautionary approach Adopt a precautionary approach to considering the adverse	Support	No specific reason given	Retain as notified
297.132	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-P10 Provision for maintenance of improved pasture for primary production where it may affe	Amend	Support with modifications to improve clarity by removing the subjective requirement for 'adequate evidence' of regular pasture maintenance, as the definition of pasture already implies this. Also consider that the clause excluding improved pasture that has become an SNA is unnecessary and circular, since such areas are already protected under SNA provisions.	Allow for the maintenance of improved pasture to continue where: 1.~~there is adequate evidence to demonstrate that~~ the maintenance of improved pasture is part of a regular cycle of periodic maintenance of that pasture; 2. any adverse effects of the maintenance of improved pasture on an identified SNA are no greater in intensity, scale, or character than the effects of activities previously undertaken as part of the regular cycle of periodic maintenance of that pasture; ~~3. the improved pasture has not, itself, become an SNA;~~ ~~4. the land is not an uncultivated depositional landform; and~~ ...
297.133	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-P11 Highly mobile fauna In relation to habitats of highly mobile fauna: identify a	Oppose	Defer until the NPS-IB review is complete	delete or amend: In relation to habitats of highly mobile fauna: 1.Assist the regional council to identify and manage areas outside of SNA's that support specified highly mobile fauna to....
297.134	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-P12 Restoration of indigenous biodiversity In relation to restoration of indigenous	Support	No specific reason given	Retain as notified
297.135	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-P13 Commercial forestry In relation to commercial forestry: the adverse effects of	Support	Support in part with appropriate management of commercial forestry within existing mapped SNA areas.	change *SNA* to *identified SNA* (3 occurrences)

297.136	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-P14 Managing indigenous vegetation outside Significant Natural Areas Avoid signific	Oppose	Considers the policy is overly broad and imposes disproportionate cost and complexity across the district, despite the NPS-IB not requiring territorial authorities to avoid significant adverse effects on indigenous vegetation outside SNAs.	Delete ECO-P14.
297.137	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-P15 Inappropriate activities within or near to Significant Natural Areas Prohibit t	Amend	Amend to specify that only deliberate planting is included.	Prohibit the deliberate planting of:
297.138	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-R1 Indigenous vegetation clearance outside of a Significant Natural Area listed in SCHED6	Support	Support, in particular the provision permitting indigenous vegetation clearance for existing established activities, provided appropriate thresholds or circumstances are met.	Retain as proposed
297.139	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-R2 Indigenous vegetation clearance within a Significant Natural Area listed in SCHED6 – Si	Amend	Support in part, endorsing clearance of indigenous vegetation where there is a functional need within listed SNAs, but suggesting that minor breaches of permitted activity standards may not always warrant an ecological assessment and this should be reflected in the note.	13.58.3. Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any application made under this provision ~~must provide~~ will likely require, in addition to the standard information requirements,
297.140	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-R3 Earthworks within a Significant Natural Area listed in SCHED6 – Significant Natural Are	Amend	Amend to improve practicality by allowing earthworks within mapped SNAs where there is a functional need, and reconsidering the 10 working days' notice requirement, which may not be feasible in cases like emergencies or weather delays. Additionally, minor earthworks exceeding permitted standards may not always justify an ecological assessment, and the note should reflect this flexibility.	PER-3 Silt and sediment control measures are in place to prevent discharge of silt and/or sediment into the Significant Natural Area ~~and notice is provided to Council 10 working days prior to the commencement of works.~~ Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any application made under this provision ~~must provide~~ will likely require, in addition to the standard information requirements, ...
297.141	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-R4 Exotic commercial forestry, agricultural intensification, quarrying activity or mining	Support	No specific reason given	Retain as notified with Matters of Discretion in the correct column
297.142	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-R5 Commercial forestry, agricultural intensification, quarrying activity or mining activit	Support	No specific reason given	Retain as notified
297.143	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-R6 Planting non-indigenous vegetation within a Significant Natural Area listed in SCHED6 –	Amend	Amend: a blanket prohibition on planting non-indigenous vegetation within SNAs could significantly impact existing primary production, and suggesting that such activities should be considered through a resource consent process where adverse effects can be appropriately managed	~~Planting~~ Deliberate planting of new non-indigenous vegetation within a Significant Natural Area listed in SCHED6 – SignificantNatural Areas Activity status: ~~Prohibited~~ Discretionary
297.144	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-R7 Planting species that result in wilding conifers	Oppose	Oppose in part - should be clarified that only deliberate planting is controlled by ECO-R6 and ECO-R7.	~~Planting~~ Deliberate planting of species that result in wilding conifers within a Significant Natural Area, or within 100m of

			within a Significant Natural Area, or			a Significant Natural Area listed in SCHED6 – Significant Natural Areas
297.145	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-S1 Indigenous vegetation clearance in highly sensitive ecological environments that are no	Oppose	Oppose - overly broad without sufficient justification and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators.	ECO-S1 Indigenous vegetation clearance in highly sensitive ecological environments that meet SNA criteria but are not currently identified as Significant Natural Areas Apart from maintenance of improved pasture, there ~~There~~ shall be no indigenous vegetation clearance in the following locations: .....
297.146	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-S2 Indigenous vegetation clearance in sensitive ecological environments that are not curre	Amend	Oppose: overly broad without sufficient justification and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators.	ECO-S2 Indigenous vegetation clearance in sensitive ecologicalenvironments that meet SNA criteria but are not currentlyidentified as Significant Natural Areas
297.147	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-S3 Indigenous vegetation clearance in threatened land environments Indigenous veget	Oppose	Oppose: overly broad without sufficient justification and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators.	ECO-S3 Indigenous vegetation clearance in threatened land environmentsthat meet SNA criteria but are not currently identified asSignificant Natural Areas
297.148	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-S4 Indigenous vegetation clearance areas dominated by snow tussock Indigenous vegetati	Oppose	*Areas dominated by snow tussock* need to be defined or mapped	ECO-S4 Indigenous vegetation clearance areas identified as dominated bysnow tussock
297.149	Parkside Holdings Ltd	Ecosystems and Indigenous Biodiversity	ECO-S5 General indigenous vegetation clearance If not addressed by ECO-S1 to ECO-S4, th	Support	Support ECO-S5 with amendments to ECO-S1 to ECO-S4.	Retain as notified subject to amendments to ECO-S1 to ECO-S4
297.150	Parkside Holdings Ltd	Natural Character	General	Support	Generally support the Natural Character chapter with modification toriparian margin definition.	Retain as proposed with amendment to riparian margin definition.
297.151	Parkside Holdings Ltd	Natural Features and Landscapes	General	Amend	Stringent provisions applied to NFL overlays are disproportionate to the land types and the scale of coverage Oppose in part Natural Features and Landscapes chapter.13.2. Oppose in part ONF035.13.3. Oppose SNF36	Seeks to adjust the overlays so that stringent rules apply only to landscapes that are agreed with landowners as significant or outstanding. Remove SNF36 Weston Wind Gap. Change boundaries of ONF035 as shown Consult directly with all affected landowners in person and onsite when identifying overlays in the plan.

297.152	Parkside Holdings Ltd	SCHED7 – Schedule of Outstanding Natural Features	ONF35 Outstanding Natural Feature Waiareka Escarpment Feature description Lime	Support	The extent of the associated overlay mapping is too broad The stringent provisions of the plan as they apply to NFL overlays are disproportionate to much of the land type and the broad scale they cover [refer to original submission for full reasons]	Change boundaries of ONF035 as shown in original submission p. 129
297.153	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-O1 Outstanding Natural Features and Landscapes Outstanding Natural Features and Landsc	Support	No specific reason given	Retain as notified
297.154	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-O2 Significant Natural Features and Rural Scenic Landscapes The values of Significant	Support	Support with amendment NFL values should be maintained only where appropriate.	Support protecting the values of SNFs and RSL <u>where appropriate.</u>
297.155	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-O3 Wilding conifers The impact of wilding conifers on Outstanding Natural Features and	Support	Supports in part objective to reduce the impact of wilding conifers on landscape areas, and suggests the policy should *encourage* reduction of these effects	<u>Encourage</u> <u>reduction of</u> the impact of wilding conifers on Outstanding Natural Features and Landscapes, Significant Natural Features, and Rural Scenic Landscapes ~~is be reduced.~~
297.156	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-O4 Restoration and enhancement of landscapes Outstanding Natural Features and Landscap	Oppose	As currently worded, could result in subjective assessments and requiring restoration and enhancement of landscape values may not always be practicable.	Delete NFL-O4 but if retained: <u>Where practicable</u>, Outstanding Natural Features and Landscapes, Significant Natural Features, and Rural Scenic Landscapes are restored and enhanced, where their values <u>listed in this plan</u> have been lost or degraded.
297.157	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-P1 Identification of Outstanding Natural Features and Landscapes In relation to the	Oppose	Supports in part the policy for identifying Outstanding Natural Features but recommends using the full Pigeon Bay criteria as current wording omits some of the criteria and could be misleading. Also considers the policy implies changes could occur outside of the plan change or review process.	Delete NFL-P1, alternatively replace with the Pigeon Bay criteria and include an additional requirement to work onsite in consultation with the landowner. Include note that changes will only occur through normal plan change or plan review.
297.158	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-P2 Identification of Significant Natural Features and Rural Scenic Landscapes In re	Oppose	Supports in part the policy for identifying NSF/RSL but recommends using the full Pigeon Bay criteria as current wording omits some of the criteria and could be misleading. Also considers the policy implies changes could occur outside of the plan change or review process.	Include all Pigeon Bay criteria and additional requirement to work onsite in consultation with landowner. Seeks also to include a note that changes will only occur through normal plan change or plan review.
297.159	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-P3 Recognise the importance of protecting natural features and landscapes Recognise:	Support	No specific reason given	Retain as notified
297.160	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-P4 Avoiding inappropriate activities on or within Outstanding Natural Features or Landscap	Amend	Support in part but wording is ambiguous - clarify intent to discourage critical infrastructure in these areas and more precise identification of values.	Only provide for subdivision, use and development where it: 1. protects the values identified in SCHED7 – Outstanding Natural Features and SCHED8 – Outstanding Natural Landscapes that make the natural feature or

						landscape outstanding; and ~~2. avoids, remedies or mitigates adverse effects on other Outstanding Natural Features and Landscapes values, including avoiding any significant loss of indigenous vegetation.~~ 2. avoids the placement of critical infrastructure within the Outstanding Natural Features and Landscapes unless there is no reasonable alternative due to the functional need for the location and the adverse effects on landscape values can be avoided or appropriately managed.
297.161	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-P5 Avoiding inappropriate activities on or within Significant Natural Features and Rural S	Amend	Clarify that only identified values are protected	Only provide for subdivision, use and development in Rural Scenic Landscapes and on Significant Natural Features where it: 1. maintains ~~amenity values; and~~ the values identified in SCHED9 - Significant Natural Features and SCHED10 - Schedule of Rural Scenic Landscapes. ~~2. avoids, remedies or mitigates adverse effects on other values of Significant Natural Features or Rural Scenic Landscapes, including avoiding any significant loss ofindigenous vegetation.~~
297.162	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-P6 Landscape's ability to absorb change When determining a landscape's ability to abso	Support	Supports the policy on condition that other landscape overlays are corrected as requested for ONF029.	Conditionally retain as drafted.
297.163	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-P7 Earthworks within identified natural features and landscapes When determining if ea	Support	Supports the policy on condition that other landscape overlays are corrected as requested for ONF029.	Conditionally retain as drafted.
297.164	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-P8 Buildings and structures on or within identified natural features and landscapes Wh	Support	Supports the policy on condition that other landscape overlays are corrected as requested for ONF029.	Conditionally retain as drafted.
297.165	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-P9 Subdivision on or within identified natural features and landscapes Avoid subdivisi	Support	Support conditional on other landscape overlays being corrected in the same manner as ONF029	Conditionally retain as drafted.
297.166	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-P10 Wilding conifers Avoid the spread of wilding conifers by: prohibiting planting of	Support	Support but notes there is no incentive for landowners to remove wilding conifers and questions the effectiveness without council support	Retain as notified but consider deleting clause (2) if there is no intention of following through
297.167	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-P11 Enhancement and restoration of Outstanding Natural Features and Landscapes, Significan	Amend	Support but suggest restoration should only occur where appropriate.	Support the enhancement and where appropriate the restoration of Waitaki's Outstanding Natural Features and Landscapes, ...
297.168	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-R1 Buildings and structures (excluding fences)	Oppose	Amend/Oppose: small-scale farm buildings should be permitted as they are compatible with landscape management. If the ONF boundaries can be rationalised to only areas that	Where: PER-1 The structure is underground; or PER-2

			on or within Outstanding Natural Features o		are genuinely natural (not improved pasture) then NFL-R1 could be supported.	The building or structure is for primary production purposes, excluding residential units; and PER-3 The building or structure does not exceed 30m2; and PER-4 The building or structure does not exceed 3m in height; and PER-5 The building or structure complies with the following standard: 1. NFL-S1
297.169	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-R2 Buildings and structures (excluding fences) on or within Significant Natural Features o	Support	Support in part but rule should allow for minor buildings on Significant Natural Features as per relief sought in submission point 298.185 or the same thresholds as in RSL.	PER-2 The building or structure is in a Rural Scenic Landscape ~~(except where it is also located on a Significant Natural Feature);~~ and...
297.170	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-R3 Permanent fencing on or within Outstanding Natural Features or Landscapes, Significant	Support	Supports conditional on deer fencing up to 2.5m high permitted for pest management	PER-2 Any fence or gates are no more than 1.5m high (except any deer fence which can be up to ~~2m~~ 2.5m high)
297.171	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-R4 Earthworks on or within Outstanding Natural Features or Landscapes or Significant Natur	Support	Supports in part but only if improved pasture is removed from ONFL overlays, otherwise, GRUZ earthworks rules should apply. Considers that earthworks are often needed to install tracks to give access for conservation efforts.	Conditionally retain as drafted if improved pasture is removed from ONFL overlays, otherwise, GRUZ earthworks rules should apply.
297.172	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-R5 Primary production activities (excluding buildings, mining activities, quarrying activi	Support	Support with modifications to the definition of agricultural intensification and removal of improved pasture from overlays.	Alter agricultural intensification definition as submitted and removeimproved pasture from ONFL's and SNF's.
297.173	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-R6 Amenity planting and shelterbelts on or within Outstanding Natural Features or Landscap	Support	Support permitting amenity planting and shelterbelts in landscape areas, where the mapping of these areas is accurate.	Retain as notified
297.174	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-R7 Outdoor recreational activities (excluding buildings) on or within Outstanding Natural	Support	Supports the rule with modification to exclude not-for-profit and charities from the definition of commercial activities and seeks to add a permitted activity criteria specifically for temporary events	Amend the definition of commercial activities (as submitted) and seeks to add a permitted activity criteria specifically for temporary events, or an advice note advising that the Temporary Events chapter overrides NFL-R7
297.175	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-R8 Landscape restoration activities on or within Outstanding Natural Features or Landscape	Support	No specific reason given	Retain as notified
297.176	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-R9 Flood protection structures and flood protection works on or within Outstanding Natural	Amend	Amend to allow all people, not just councils, to undertake flood protection works.	Seeks deletion of PER-1. If retained, seeks to add a note advising that emergency works are permitted under the RMA.
297.177	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-R10 Plantation Forestry within or on Significant Natural Features or Rural Scenic Landscap	Support	No specific reason given	No specific reason given

297.178	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-R11 Mining activities and/or quarrying activities (excluding existing farm quarries) withi	Support	Amend to protect all existingquarrying activities Also submitted that *taking of building stone* be removed from mining definition	Mining activities and/or quarrying activities (excluding existing ~~farm quarries~~ quarrying activity) within or on Significant Natural Features or Rural Scenic Landscapes
297.179	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-R12 Mining activities and/or quarrying activities (excluding existing farm quarries) on or	Amend	Amend to protect all existing quarrying activities Also submitted that *taking of building stone* be removed from mining definition	Preferably retain the operative plan SNF for WhitestoneEscarpment/Waiareka Escarpment Ensurequarrying of 'building stone' is captured by the quarrying definition and protect existing quarrying activity on sites with ONF andONL
297.180	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-R13 Intensive indoor primary production and intensive outdoor primary production within or	Oppose	Oppose in part: restricted discretionary status more appropriate than non-complying as intensive indoor and/or outdoor primary production may be appropriate in parts of the RSL, particularly where land is already irrigated and developed.	Amend from non-complying activity status to restricted discretionary with the matters of discretion being the same as NFL-R10.
297.181	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-R14 Plantation Forestry on or within Outstanding Natural Features or Landscapes All	Support	No specific reason given	Retain as notified
297.182	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-R15 Planting species that can result in wilding conifers on or within Outstanding Natural	Support	No specific reason given	Retain as notified
297.183	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-R16 Intensive indoor primary production and intensive outdoor primary production on or wit	Support	No specific reason given	Retain as notified
297.184	Parkside Holdings Ltd	Natural Features and Landscapes	NFL-S1 Standards for colours of buildings and structures in landscapes Buildings and st	Support	No specific reason given	Retain as notified
297.185	Parkside Holdings Ltd	Public Access	PA-O1 Public and customary access Public and customary access is protected, maintained,	Support	No specific reason given	Retain as notified
297.186	Parkside Holdings Ltd	Public Access	PA-O2 Provision of public access minimises adverse effects Public access to and along t	Support	No specific reason given	Retain as notified
297.187	Parkside Holdings Ltd	Public Access	PA-P1 Activities that protect and maintain public and customary access Enable activitie	Support	No specific reason given	Retain as notified
297.188	Parkside Holdings Ltd	Public Access	PA-P2 Mechanisms for improving public access Protect, maintain and enhance public acces	Oppose	Oppose encouraging public access opportunities in land use applications but considers it is too ambiguous without rules and could pressure applicants and suggests limiting to esplanade reserves/strips where appropriate through a subdivision process.	Protect, maintain and enhance public access by: ~~1. encouraging opportunities and mechanisms to maintain and enhance public access when a land use application provides an opportunity for access; and~~

						~~2.~~1. requiring the creation of esplanade reserves and esplanade strips where appropriate in accordance with the Subdivision Chapter, ~~with priority given~~ along the waterways listed in SCHED11 – ...
297.189	Parkside Holdings Ltd	Public Access	PA-P3 Consideration of adverse effects on public access When considering any applicatio	Amend	Amend so applies only to public land, not private land.	When considering any application for resource consents, have regard to any adverse effects of the proposed activity on public access routes and access points on public land.
297.190	Parkside Holdings Ltd	Activities on the Surface of Water	General	Support	General support the ASW chapter.	Retain as proposed except for following submission points on P2 and R1
297.191	Parkside Holdings Ltd	Activities on the Surface of Water	ASW-P2 Commercial activities Provide for commercial surface water activities where it can	Support	Support conditional to redefining 'commercial activities' as submitted on definitions chapter.	Redefine 'commercial activities' as submitted.
297.192	Parkside Holdings Ltd	Activities on the Surface of Water	ASW-R1 Use of vessels for a recreational activity All zones Activity status: Permitted	Amend	Considers that prescribed noise limits for vessels may create reverse sensitivity for recreational lake use as houses are built nearby and suggests protecting existing uses.	PER-2 The following noise limits are not exceeded at a notional boundary established prior to 1st March 2025:
297.193	Parkside Holdings Ltd	Light	General	Support	No specific reasons given	Retain entirely as proposed.
297.194	Parkside Holdings Ltd	Noise	General	Support	No specific reasons given	Retain entirely as proposed
297.195	Parkside Holdings Ltd	Signs	General	Support	Generally support Signs chapter.	Retain as proposed, except for following submission on R7
297.196	Parkside Holdings Ltd	Signs	SIGN-R7 Signs attached to a trailer, vehicle or vessel All zones Activity status: Non	Amend	rule controlling signs on vehicles/trailers is ambiguous and may cause arbitrary decision-making and suggests clarifying exemptions for company vehicles and business operations	Amend: This rule does not apply to: 1. ~~an advertising~~ sign painted or adhered directly onto company/fleet vehicles or trailers ~~which is incidental to the primary use of that vehicle or trailer;~~ or 2. an advertising sign painted or adhered directly onto company/fleet vehicles or trailers which ~~are used in the day-to-day operation of that~~ business; or 3. businesses operating from a vehicle. ~~truck or caravan such as food vendors.~~
297.197	Parkside Holdings Ltd	Temporary Activities	General	Support	Support for chapter with modification to remove the word 'light' from 'light aircraft' as this is not defined. Also refer to submission point on definitions chapter related to 'temporary activities'.	replace'helicopter' and 'light aircraft' with 'aircraft.'
297.198	Parkside Holdings Ltd	Temporary Activities	TEMP-R6 Temporary helicopter and light aircraft take-offs and landings, excluding Ōamaru Airpo	Support	Considers that 'helicopter' is not a defined term and should be replaced with 'aircraft' [refer to submission point on definitions chapter related to 'temporary activities'	'helicopter' and 'light aircraft' with 'aircraft' throughout the chapter
297.199	Parkside Holdings Ltd	General Rural Zone	GRUZ-O1 Purpose of the General Rural Zone The	Support	Support the purpose of the general rural zone for primary production and that the rural zone provides vital socio-economic benefits to the District	Retain as notified

			General Rural Zone provides for primary p			
297.200	Parkside Holdings Ltd	General Rural Zone	GRUZ-O2 Character of the General Rural Zone The character of the General Rural Zone rem	Support	Support while recognising that odours are managed by the regional council. Support that primary production contributes to open character and maintenance of rural landscapes, and that a degree of built form is necessary to support the ongoing productivity of the rural zone.	Retain as notified
297.201	Parkside Holdings Ltd	General Rural Zone	GRUZ-O3 Highly productive land The value and long-term benefits of using highly product	Support	Managing highly productive land is important to retain and supportprimary production in the rural environment, particularly where land isidentified as being highly productive.	Retain as notified
297.202	Parkside Holdings Ltd	General Rural Zone	GRUZ-O4 Rural amenity values A range of activities anticipated in the General Rural Zon	Support	Support: important that land uses in the rural zone are compatible with primary production and the general rural amenity values afforded from good land management practices are maintained.	Define 'rural amenity values' as follows: include; open space, primary production, low population and building density, pastoral and arable character interspersed with indigenous biodiversity, relative quietness compared to urban areas, and connection to land for cultural, recreational and historic reasons.
297.203	Parkside Holdings Ltd	General Rural Zone	GRUZ-O5 Business development in rural areas Rural areas are retained for primary produc	Support	Support - recognition is important for enabling appropriate rural-based business activities that complement the zone's purpose.	Retain as notified
297.204	Parkside Holdings Ltd	General Rural Zone	GRUZ-P1 Protection of highly productive land Protect highly productive land for use by	Support	Support - important that identified highly productive land is protected for primary production.	Retain as notified
297.205	Parkside Holdings Ltd	General Rural Zone	GRUZ-P2 Development in the General Rural Zone Maintain the rural character in the Gener	Support	Support with amendment to enable quality staff housing and additional dwellings and recognising the diverse residential needs of rural operations without compromising housing standards.	...4. encouraging the maintenance and enhancement of existing, and the planting of new, indigenous vegetation where appropriate; and 5. providing for conservation activities; and 6. recognising and providing for lawfully established rural activities and minimising reverse sensitivity effects on primary production and ancillary activities of new development in the General Rural Zone; and 7. providing for a ~~single~~minor residential unit on sites to facilitate residential choice and flexibility ~~while ensuring that the minor residential unit is subservient to the principal residential unit on the site.~~ 8. providing for multiple residential units on large sites to facilitate staff accommodation while ensuring building density is appropriate for the General Rural Zone.
297.206	Parkside Holdings Ltd	General Rural Zone	GRUZ-P3 Design of development in rural areas Ensure that new development is well design	Support	Support the policy intent to ensure new development is appropriate forthe environment and buildings and structures are necessary tosupport primary production.	Retain as notified

297.207	Parkside Holdings Ltd	General Rural Zone	GRUZ-P4 Maintenance of clear urban, rural lifestyle and rural areas Maintain a clear di	Support	Support intent where there is clear distinction between urban and rural environments but encourage flexibility for primary production activities on the rural fringe where adverse effects can be appropriately managed.	Seeks to amend as: Maintain a clear distinction between urban, rural lifestyle and rural areas through the use of clear land use zones and avoidance of ad-hoc subdivision where growth to Settlement or Rural Lifestyle zones has not been planned for unless the adverse effects can be avoided, remedied or mitigated.
297.208	Parkside Holdings Ltd	General Rural Zone	GRUZ-P5 Intensive primary production Provide for intensive indoor primary production an	Support	Support: important that provision is made for intensive primary production in the rural zone where effects can be appropriately managed.	Retain as notified
297.209	Parkside Holdings Ltd	General Rural Zone	GRUZ-P6 Integration of primary production with natural and cultural values Recognise th	Amend	Support but seeks clarification that sensitive values do not apply across the entire GRUZ zone and recommend limiting specialist reports to identified overlays, and advocate for enabling new primary production activities.	Recognise the importance of the identified landscape, heritage, biodiversity and mana whenua values and provide for continued and new primary production in these areas while avoiding, remedying or mitigating any adverse effects on the values.
297.210	Parkside Holdings Ltd	General Rural Zone	GRUZ-P7 Intensive primary production and extractive industries in close proximity to settlemen	Support	Support intent that any new primary production and extractive industries avoid adverse effects on existing settlements.	Retain as notified
297.211	Parkside Holdings Ltd	General Rural Zone	GRUZ-P8 Energy and resource efficiency Encourage minimisation of energy and water use a	Amend	Support in part GRUZ-P8. Support policy intent to encourage energy and resource efficiency, where appropriate to do so. Note that Energy chapter is not permissive enough to give effect to this policy.	*Encourage minimisation of energy and water use and the use of low impact design such as optimal site layout, passive solar design, solar power and water heating, and greywater recycling for any new development, where appropriate.*
297.212	Parkside Holdings Ltd	General Rural Zone	GRUZ-P9 Outline Development Plans Provide for any substantial development extension of	Support	Support with clarification that recreational, heritage, and ecological values should be limited to those identified in the plan to avoid unnecessary reporting, and suggest using covenants or separation distances to manage adverse effects on new dwellings near the General Rural Zone.	*...c. retains and supports the relationship to, and where possible enhances, identified recreational, heritage and ecological features and values; and* *d. is co-ordinated with the delivery of appropriate infrastructure; and* *e. achieves a high level of amenity; and* *f. specifies covenants and/or provides a sufficient separation distance of habitable buildings with the General Rural Zone to minimise the potential for reverse sensitivity effects.*
297.213	Parkside Holdings Ltd	General Rural Zone	GRUZ-R1 Building activity General Rural Zone Activity status: Permitted Where: PER-	Support	Support rule to provide for building activity in the rural zone and default to restricted discretionary where compliance can not be achieved.	Retain as notified
297.214	Parkside Holdings Ltd	General Rural Zone	GRUZ-R2 Primary production (excluding carbon forestry otherwise provided for in GRUZ-R18, mini	Amend	Support rule advocating for the protection of existing mining and quarrying activities in the General Rural Zone, and affirm that primary production is appropriately located within this zone.	Primary production (excluding carbon forestry otherwise provided for in GRUZ-R18, new mining activity, new quarrying activities, new intensive indoor primary production and new intensive outdoor primary production)
297.215	Parkside Holdings Ltd	General Rural Zone	GRUZ-R3 Amenity planting and shelterbelts General Rural Zone Activity status: Permitt	Amend	Amend to clarify that PER-1 may overly restrict amenity planting due to broad pest species criteria, and that PER-2 should regulate actual effects rather than speculative ones.	PER-1 The amenity planting or shelterbelt does not involve planting of species that are, ~~or can become,~~ pest species as identified in any Regional Pest Management Plan; and

						PER-2 The amenity planting ~~will~~ does not shade any existing adjoining
297.216	Parkside Holdings Ltd	General Rural Zone	GRUZ-R4 Residential activity General Rural Zone Activity status: Permitted Activity	Support	No specific reason given	Retain as notified
297.217	Parkside Holdings Ltd	General Rural Zone	GRUZ-R5 Residential unit General Rural Zone Activity status: Permitted Where: PER-1	Support	No specific reason given	Retain as notified
297.218	Parkside Holdings Ltd	General Rural Zone	GRUZ-R6 Accessory building General Rural Zone Activity status: Permitted Activity s	Support	No specific reason given	Retain as notified
297.219	Parkside Holdings Ltd	General Rural Zone	GRUZ-R7 Minor residential unit General Rural Zone Activity status: Permitted Where:	Support	Support in part, recommending it apply only to smaller sites, with staff housing for larger farms permitted through other provisions to ensure adequate and appropriate accommodation for rural workers.	Retain as notified
297.220	Parkside Holdings Ltd	General Rural Zone	GRUZ-R8 Visitor accommodation General Rural Zone Activity status: Permitted Where:	Support	Amend to better match the control with the potential for adverse effects	PER-1 The visitor accommodation is limited to homestays accommodating no more than ~~5~~10visitors at any one time; and
297.221	Parkside Holdings Ltd	General Rural Zone	GRUZ-R9 Home business (excluding primary production activity) General Rural Zone Acti	Support	Support for enabling employment and entrepreneurialism in the rural zone, noting that effects like noise and visual impact are typically well managed through existing provisions, and recommend flexibility for outdoor storage and activities, with screening requirements clearly defined and not overly restrictive.	~~PER-1~~ ~~No more than 40m2 of the gross floor area of all buildings on the site is used for the home business; and~~ ~~PER-2~~PER-1 No more than one full time employee, or equivalent, ~~engaged in~~ working at the site of the home business, resides off-site; and ~~PER-3~~PER-2 No more than 2 heavy vehicle movements, and a total of 20 vehicle movements are generated in a 24-hour period for the home business; and ~~PER-4~~PER-3 Any on-site storage of materials associated with the home business is undertaken within buildings on the site, or is screened to a height of at least 1.2m from adjoining roads and sites; and ~~PER-5~~ PER 4 The manufacturing, altering, repairing, dismantling or processing of any goods, or articles associated with the home business, take place within a building or is screened to a height of at least 1.2m from adjoining roads and sites.
297.222	Parkside Holdings Ltd	General Rural Zone	GRUZ-R10 Intensive indoor primary production and intensive outdoor primary production G	Support	Support with modifications to avoid duplication of effluent consent requirements already managed by the Regional Council and recommend aligning any remaining provisions with Regional Council's 150m notification threshold.	PER-2 1. housed pigs are located no closer than 500m to a property boundary; and

						~~2. no disposal or storage of effluent within 500m of a residential unit on any other site; and~~ 3. no intensive indoor primary production or intensive outdoor primary production of pigs occurs within ~~2 kilometres~~ 150m of a Residential, Settlement, or Open Space Zone; or PER-3... ~~2. no disposal or storage of effluent within 500m of a residential unit on any other site; and~~ 3. no intensive indoor primary production or intensive outdoor primary production of poultry occurs within ~~2 kilometres~~150m of a Residential, Settlement or Open Space Zone; or PER-4 For intensive indoor primary production or intensive outdoor primary production of any other species, there is: ~~1. no disposal or storage of effluent within 500m of a residential unit on any other site; and~~ 2. a setback of at least ~~2 kilometres~~ 150m from a Residential, Settlement or Open Space Zone.
297.223	Parkside Holdings Ltd	General Rural Zone	GRUZ-R11 Recreational activity General Rural Zone Activity status: Permitted Activi	Support	No specific reason given	Retain as notified
297.224	Parkside Holdings Ltd	General Rural Zone	GRUZ-R12 Flood protection structures General Rural Zone Activity status: Permitted	Support	No specific reason given	Retain as notified
297.225	Parkside Holdings Ltd	General Rural Zone	GRUZ-R13 Conservation activities General Rural Zone Activity status: Permitted Acti	Support	No specific reason given	Retain as notified
297.226	Parkside Holdings Ltd	General Rural Zone	GRUZ-R14 Commercial activity General Rural Zone Activity status: Permitted Where: P	Amend	Amend to allow farm shops to sell a broader range of locally produced primary goods, ideally within a 100km radius, while maintaining rural character and avoiding expansion into general retail.	PER-1 Retail sales are limited to: 1. food sourced from primary production activities within a 100km radius of the site ~~farming produce (including milk, fruit, vegetables, plants, flowers, or eggs) produced on the site, or honey processed on the site; or~~
297.227	Parkside Holdings Ltd	General Rural Zone	GRUZ-R15 Aeroplane airstrips and helicopter landing areas, and the use of these by aircraft	Oppose	Aircraft movement limit should be increased to 32 per month for flexibility, and that no limit should apply where sufficient setbacks ensure there are no adverse effects at the nearest boundary.	PER-3 The use of the landing area or airstrip is for any other activity which results in no more than~~8 aircraft movements per week (4 take-offs and 4~~

						~~landings)~~ 32 aircraft movements per month; or PER-4 The airstrip is more than 1,000m from the nearest notional boundary under different ownership; or
297.228	Parkside Holdings Ltd	General Rural Zone	GRUZ-R16 Papakāika within land held under Te Ture Whenua Māori Act 1993 or within a Native Res	Support	No specific reason given	Retain as notified
297.229	Parkside Holdings Ltd	General Rural Zone	GRUZ-R17 Seasonal Worker accommodation General Rural Zone Activity status: Permit	Amend	Supports the need for seasonal worker housing but oppose limitations that encourage sub-standard accommodation, advocating instead for flexible, self-contained, and higher-quality options that respect the dignity and needs of workers.	PER-1 The minor residential unit or building ~~and/or any campsite~~ is only to be used by workers employed on the site; and ... ~~PER-3~~ ~~Any building is relocatable or able to be reconfigured to a building accessory to land-based primary production; and~~ ~~PER-4~~ ~~Any seasonal worker accommodation contains no more than one kitchen facility; and~~ ~~PER-5~~ ~~Any building used for seasonal worker accommodation is no more than 125m2 gross floor area; and~~ PER-6 Any building used for seasonal worker accommodation provides for a maximum of 10 occupants; and ~~PER-7~~ ~~The maximum area used for camping as part of any seasonal worker accommodation shall be 1000m2 and be located at least 100m from any residential unit on an adjoining site.~~
297.230	Parkside Holdings Ltd	General Rural Zone	GRUZ-R18 Carbon forestry General Rural Zone Activity status: Permitted Where: PER-1	Amend	Amend to permit suitable indigenous species for carbon forestry, align setback rules with biodiversity provisions, correct wording around pest species, and remove unnecessary restrictions that conflict with broader plan objectives to enhance native biodiversity	PER-1 The species of planting are indigenous ~~to the ecological district in which the activity is to take place; and~~ ... PER-4 ... ~~4. within 10m of a Significant Natural Area; and~~ PER-5

						The carbon forestry activity ~~does not involve the planting~~ avoids an increase in scale or intensity of any pest, pest agent, or organism of interest identified in the relevant Regional Pest Management Plan; and ~~PER-6~~ ~~The carbon forestry utilises no more than 50% of any site~~
297.231	Parkside Holdings Ltd	General Rural Zone	GRUZ-R19 Rural Industry General Rural Zone Activity status: Restricted Discretion	Support	Support with more permissive settings to reflect the functional and operational needs of rural industries, noting that site design and infrastructure are developer decisions and that adverse effects are already managed through other chapters in the plan.	Seeks to amend as follows: Activity status:~~Restricted Discretionary~~ Permitted Where: PER-1 The activity is not a potentially high-impact industrial activity. Note: consent may be required under the Transport chapter. ~~Matters of discretion are restricted to:~~ ~~1. the suitability of the location, site design and layout; and~~ ~~2. the intensity and scale of the activity; and~~ ~~3. the extent of adverse effects on existing or permitted activities; and~~ ~~4. the extent of adverse effects on the safe and efficient operation of the road network, and suitability of onsite loading, manoeuvring and access; and~~ ~~5. the provision of infrastructure to service the activity.~~
297.232	Parkside Holdings Ltd	General Rural Zone	GRUZ-R20 Papakāika where not otherwise provided for under GRUZ-R16 General Rural Zone	Support	No specific reason given	Retain as notified
297.233	Parkside Holdings Ltd	General Rural Zone	GRUZ-R21 Community facility General Rural Zone Activity status: Discretionary Activ	Support	No specific reason given	Retain as notified
297.234	Parkside Holdings Ltd	General Rural Zone	GRUZ-R22 Industrial activity General Rural Zone Activity status: Discretionary Acti	Support	No specific reason given	Retain as notified
297.235	Parkside Holdings Ltd	General Rural Zone	GRUZ-R23 Any other activity not provided for as a permitted, restricted discretionary, non-com	Support	No specific reason given	Retain as notified
297.236	Parkside Holdings Ltd	General Rural Zone	GRUZ-R24 Retirement village General Rural Zone Activity status: Non-Complying Activ	Support	No specific reason given	Retain as notified

297.237	Parkside Holdings Ltd	General Rural Zone	GRUZ-R25 Educational facility General Rural Zone Activity status: Non-Complying Act	Oppose	Opposes the non-complying activity status for schools in rural zones and considers that their rural character typically minimises reverse sensitivity risks and that access to education should be balanced with protecting primary production.	Seeks to amend the activity to a permitted activity with appropriate setbacks for buildings for the educational facility or restricted discretionary.
297.238	Parkside Holdings Ltd	General Rural Zone	GRUZ-S1 Residential site density The maximum density of residential units on any site	Support	No specific reason given	Retain as notified
297.239	Parkside Holdings Ltd	General Rural Zone	GRUZ-S2 Maximum height All building and structures must not exceed a maximum height of	Support	Support GRUZ-S2 with amendment to reflect that grain silos can be up to 25m in height.	Seeks to amend as follows: 1. All building and structures must not exceed a maximum height of: ... 2.~~15m~~ 25m for grain silos; ...
297.240	Parkside Holdings Ltd	General Rural Zone	GRUZ-S3 Building coverage The building coverage for any site shall not exceed 20%. Rai	Support	No specific reason given	Retain as notified
297.241	Parkside Holdings Ltd	General Rural Zone	GRUZ-S4 Road and rail setbacks A stock loading ramp or race with its entry/exit point	Support	Support with modification to allow stock loading ramps angled to the road, provided there is at least 30m of space to accommodate full off-road parking and manoeuvring.	Seeks to amend as follows: 1. A stock loading ramp or race with its entry/exit point located facing a road, including a State Highway, shall not be located within ~~a~~ 30m ~~setback~~ from the road boundary in the direction the loading ramp faces. 2. A stock loading ramp or race with its entry/exit point running parallel or away from ~~to~~ the road is exempt from this standard.
297.242	Parkside Holdings Ltd	General Rural Zone	GRUZ-S5 Internal boundary setbacks The minimum setback of any part of a building or str	Support	No specific reason given	Retain as notified
297.243	Parkside Holdings Ltd	General Rural Zone	GRUZ-S6 Frontage fencing Any fencing within a road boundary setback or internal bounda	Support	Support with modification to exempt the curtilage of residential and minor residential units, allowing more residential-style fencing around homes while retaining appropriate rural fencing elsewhere in the zone.	Seeks to amend as follows: 1. Any fencing within a road boundary setback or internal boundary setback shall be post and netting, post and wire, or post and rail fencing. 2. Fencing of residential units and minor residential units is exempt from this standard.
297.244	Parkside Holdings Ltd	General Rural Zone	GRUZ-S7 Crop protection structures Dark green or black cloth is used for all vertical	Oppose	Considers there should be justification for colour and size restrictions.	Seeks to delete or provide evidence or justification for colour and size restrictions.
297.245	Parkside Holdings Ltd	General Rural Zone	GRUZ-S8 Hours of operation Any activity (other than a residential activity or visitor	Support	Support intent to limit hours for rural amenity protection but considers the matters of discretion should also address potential reverse sensitivity effects on primary production activities.	Seeks to amend as follows: Matters of discretion are restricted to: ... 2. any adverse effects on the amenity values of properties on any

						adjoining residential sites; and 3. any reverse sensitivity effects on primary production.
297.246	Parkside Holdings Ltd	General Rural Zone	GRUZ-S9 Servicing and firefighting water supply and access All new buildings must be c	Oppose	Oppose in part, supporting its intent to ensure buildings are appropriately serviced but recommending flexibility for farm and accessory buildings that do not require reticulated services to avoid unrealistic expectations.	Seeks to amend as follows: 1. All new residential buildings must be connected to reticulated services where these are available; and 2. All new residential buildings must comply with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PA 4509:2008 unless written approval is provided from Fire and Emergency New Zealand regarding an alternative firefighting water supply.
297.247	Parkside Holdings Ltd	Transport	TRAN-O1 On-site transport facilities and access Use and development has safe and effective	Support	No specific reason given	Retain as notified
297.248	Parkside Holdings Ltd	Transport	TRAN-O2 High trip generating use and development The safety and efficiency of the transpor	Support	No specific reason given	Retain as notified
297.249	Parkside Holdings Ltd	Transport	TRAN-O3 Transport network The transport network is effective, accessible and integrated	Support	No specific reason given	Retain as notified
297.250	Parkside Holdings Ltd	Transport	TRAN-P1 High trip generating use and development Provide for high vehicle trip generato	Support	Support with modification to clarify the term 'surrounding area' in Point 5, as it is currently vague and may lead to inconsistent interpretation.	Seeks to amend as follows: ... 5. the effect of the proposed activity on the character and amenity values of the surrounding ~~area~~ adjoining sites; and ...
297.251	Parkside Holdings Ltd	Transport	TRAN-P2 Appropriate on-site transport facilities Enable on-site transport facilities where	Oppose	Opposes the policy as it addresses only on-site effects and considers that internal site use is typically managed by landowners and industry standards, and that provisions should focus on impacts beyond the site to align with TRAN-O1 and avoid unnecessary safety risks.	Seeks to amend as follows: Enable on-site transport facilities where these: 1. meet industry standards; and 2. are of a location and design that provides for: a. public health and safety; and ~~b. the safe and efficient use of the site; and~~ c. the safe and efficient functioning of the transport network; and d. the reasonable loading and access demands generated by the use of the site; and e. the safe and effective access for firefighting purposes. ~~3. promote the uptake and use of the active transport network.~~
297.252	Parkside Holdings Ltd	Transport	TRAN-P3 Potentially appropriate on-site transport	Oppose	Considers the policy unnecessary as relevant matters are already addressed unless they regulate internal effects. Considers it	Amend as follows:

			facilities Only allow for on-site tra		should focus solely on firefighting access and remove provisions targeting off-site effects.	Only allow for on-site transport facilities that do not meet industry standards where it can be demonstrated, if applicable, that: ~~1. the design is in response to site and/or topographical constraints; and~~
297.253	Parkside Holdings Ltd	Transport	TRAN-P4 Vehicle crossings Provide for safe and efficient connections between the transp	Support	Support to the extent that it applies to new vehicle crossings.	Seeks to amend as follows: Provide for safe and efficient connections between the transport network and on-site transport facilities by requiring <u>new</u> vehicle crossings to roads to address: ...
297.254	Parkside Holdings Ltd	Transport	TRAN-P5 Regionally Significant Infrastructure Recognise the social, economic, cultural	Support	Support, particularly the definition of Regionally Significant Infrastructure.	Retain as notified
297.255	Parkside Holdings Ltd	Transport	TRAN-P6 Multi-modal and active transport Encourage activities to incorporate opportunitie	Oppose	Considers to be overly strong in wording and that cycling/pedestrian modes are more hazardous and should not be encouraged where full cycling infrastructure is not available.	Seeks to amend as follows: ~~Encourage~~ <u>Promote</u> activities to incorporate opportunities for multi-modal and active transport, including cycle parking and end of trip facilities <u>if the site is served by the active transport network where it separates cyclists and pedestrians.</u>
297.256	Parkside Holdings Ltd	Transport	TRAN-P8 Upgrading of the transport network Provide for the upgrading or development of	Support	Considers clearer guidance needed on when to respond to earthworks effects, suggesting the policy be limited to landscape and ecological values identified in overlays and chapters of the plan.	Seeks to amend as follows: ... 8. responds to site and topographical constraints including opportunities to reduce the effects of earthworks on <u>identified</u> landscape and ecological values; ...
297.257	Parkside Holdings Ltd	Transport	TRAN-P9 Roads as infrastructure corridors Encourage the use of roads as infrastructure	Support	No specific reason given	Retain as notified
297.258	Parkside Holdings Ltd	Transport	TRAN-P10 Road classification Classify roads according to their function and anticipated	Support	No specific reason given	Retain as notified
297.259	Parkside Holdings Ltd	Transport	General	Oppose	Considers that rural zones should be exempt from policies that may pressure developers to fund cycle and footpaths where they offer no practical benefit and seeks clarification that policies apply only to new activities, noting that technical evidence from the WDC roading department is needed to support provisions for road crossings.	Seeks to have submission points considered across all TRAN provisions and for the roading department to reply to this submission at further hearings commenting on the TRAN chapter overall.

297.260	Parkside Holdings Ltd	Transport	TRAN-R1 Vehicle crossings onto roads All zones Activity status: Permitted Where: PE	Support	Support for new vehicle crossings subject to TRAN-R1 for new vehicle crossings.	Seeks to amend as follows: TRAN-R1 New Vehicle crossings onto roads
297.261	Parkside Holdings Ltd	Transport	TRAN-R2 Site access for activities without any on-site vehicle parking space or loading spaces	Support	Support with modifications to clarify that pedestrian and cycling access requirements should not apply in zones where vehicle travel is operationally necessary, such as due to distance.	Seeks to amend as follows: TRAN-R2 Site access for new activities without any on-site vehicle parking space or loading spaces PER-1 All of the following standards are complied with where relevant: 1. TRAN-S1 Pedestrian and cycling access in Residential Zones; 2. TRAN-S2 Firefighting access
297.262	Parkside Holdings Ltd	Transport	TRAN-R3 On-site parking, loading, and access All zones Activity status: Permitted W	Oppose	Considers the provision overregulates internal site effects unrelated to the transport network, particularly dairy lanes and private access already covered under TRAN-S3, and finds TRAN-S5 overly restrictive by limiting vehicle standing, queuing, and manoeuvring within a site that are inherent and internal and should not be subject to standards.	Seeks to delete TRAN-S7 and TRAN-S8 from the rule.
297.263	Parkside Holdings Ltd	Transport	TRAN-S9 Accessible parking spaces Where parking spaces are provided on site: any on-si	Support	Support subject to submissions from disability advocate organisations, particularly with reference to rural sites.	Retain as notified
297.264	Parkside Holdings Ltd	Transport	TRAN-S10 Design requirements for on-site vehicle parking spaces Where parking spaces ar	Oppose	Considers the managing of internal site effects inconsistent with TRAN-O1 and recommends it be amended to clarify that it does not apply to rural or residential zones.	Seeks to provide clarification that the standard does not apply to rural and residential zones.
297.265	Parkside Holdings Ltd	Transport	TRAN-S11 Surface of parking and loading areas The surface of all parking and loading a	Oppose	Considers that setting a low car park threshold would place undue burden on rural zones, and that regulating internal site effects is inconsistent with TRAN-O1.	Seeks to provide clarification that the standard does not apply to rural and residential zones.
297.266	Parkside Holdings Ltd	Transport	TRAN-S12 On-site cycle parking All developments, excluding residential units and prima	Amend	Considers that while TRAN-S12 excludes primary production, it should also exclude rural zones due to long travel distances and lack of separated cycleways, noting that many related standards are similarly irrelevant in rural contexts.	Seeks to provide clarification that the standard does not apply to rural zones.
297.267	Parkside Holdings Ltd	Transport	TRAN-S12 On-site cycle parking All developments, excluding residential units and prima	Oppose	Considers standard to be overly prescriptive regarding the standard of cycle parking.	Seeks to provide clarification that the standard does not apply to rural and residential zones
297.268	Parkside Holdings Ltd	Transport	TRAN-R3 On-site parking, loading, and access All zones Activity status: Permitted W	Oppose	Opposes incorporating Australian and New Zealand Standards by reference in the district plan due to their cost, copyright restrictions, external review processes, and inefficiency and considers the PDP should include locally specified standards to avoid financial barriers and regulatory outsourcing.	Seeks to use standards acceptable to the WDC roading department which are written into the plan to be freely available. Delete TRAN-R3. Alternatively, if retained sees to amend as follows

						All zones except Rural Lifestyle Zone, General Rural Zone, Macraes Mining Zone and Settlement Zone. PER-1 All of the following standards are complied with where relevant; 1. TRAN-S2 Firefighting access; ~~2. TRAN-S3 Service lanes, private ways, private roads, pedestrian accessways and walkways;~~ ~~3. TRAN-S4 Reverse manoeuvring;~~ ~~4. TRAN-S5 Design standards for vehicle manoeuvring areas;~~ 5. TRAN-S6 Service stations and truck stops; ~~6. TRAN-S7 On-site loading spaces for non-residential activities;~~ ~~7. TRAN-S8 Design requirements for loading and vehicle standing spaces;~~ 8. TRAN-S9 Accessible parking spaces; ~~9. TRAN-S10 Design requirements for on-site vehicle parking spaces;~~ ~~10. TRAN-S11 Surface of parking and loading areas;~~ ~~11. TRAN-S12 On-site cycle parking.~~ Matters of discretion are restricted to: 1. the matters of discretion listed in any of the standards TRAN-S2,~~TRAN-S3, TRAN-S4, TRAN-S5,~~ TRAN-S6,~~TRAN-S7, TRAN-S8,~~TRAN-S9, ~~TRAN-S10, TRAN-S11, and/or TRAN-S12~~ that are not complied with.
297.269	Parkside Holdings Ltd	Transport	TRAN-R4 Vehicle trip generating activities All zones Activity status: Permitted Whe	Support	Supports with changes to reduce the consent threshold and controlling the activity directly by the number of traffic movements rather than using proxies like gross floor area.	Retain as notified with changes to Table 6 - High Trip Generator Thresholds.
297.270	Parkside Holdings Ltd	Transport	TRAN-R5 Walkways, cycleways and shared paths which are located on public land other than a roa	Support	Support with amendment to replace the Austroads Guide with a specific standard to ensure oversight of future changes is under WDC control.	Seeks to retain as notified with changes to TRAN-S20.
297.271	Parkside Holdings Ltd	Transport	TRAN-R6 Extensions and new vehicle access tracks ancillary to infrastructure, outside of any o	Support	Support with amendment to apply within overlays as extensive coverage of the Rural Scenic and Outstanding Natural Landscapes overlays makes it overly restrictive if excluded, and considers infrastructure access should take precedence over overlay values without requiring consent or incurring additional costs.	Seeks to amend as follows: TRAN-R6 Extensions and new vehicle access tracks ancillary to infrastructure, ~~outside of any overlay~~
297.272	Parkside Holdings Ltd	Transport	TRAN-S3 Service lanes, private ways, private roads, pedestrian accessways and walkways	Support	Support if restricted to public ways only and specifies a standard rather than requiring purchase of the standard.	Seeks to amend as follows: TRAN-S3 Service lanes, ~~private ways, private roads,~~ pedestrian accessways and walkways on public land. 1. Service lanes, private ways, private roads, pedestrian accessways and walkways on public land must be designed and constructed in accordance with [describe standards here] ~~NZS 4404:2010 Land Development and~~

						~~Subdivision Infrastructure; except where Table 7 Minimum legal widths and formation requirements for private ways/vehicle access lots replaces the formation requirements of private ways for residential units detailed in NZS 4404:2010.~~
297.273	Parkside Holdings Ltd	Transport	TRAN-S5 Design standards for vehicle manoeuvring areas Areas must be provided on a sit	Oppose	Considers the standard overly restrictive by requiring all vehicle standing, queuing, and manoeuvring to occur entirely within a site, including areas inherently used for such purposes, making on-street parking non-compliant and imposing internal site controls unrelated to TRAN-O1.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. Areas must be provided on a site for vehicles to stand, queue and make all necessary manoeuvres on site without using the road or State Highway, ~~and without using the area provided for parking space, servicing, loading space or outdoor storage purposes;~~ and ...Matters of discretion are restricted to: 1. the safety and movement of pedestrians, cyclists, public transport and general traffic <u>on the road corridor.</u>
297.274	Parkside Holdings Ltd	Transport	TRAN-S7 On-site loading spaces for non-residential activities The number of loading sp	Oppose	Considers the standard inappropriate for rural contexts and that it imposes unnecessary discretion over loading needs best determined by the operator. Also considers that it relies on outdated and inaccessible standards and should instead include explicit provisions within the plan.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. The number of loading spaces for any non-residential activity must not be less than that shown in Table 8 – Minimum loading space requirements for non-residential activities below and must be provided on-site, except in the Town Centre Zone <u>and rural zones.</u> ... 3. Neither Clause 1 or 2 above apply to sites of less than 50m2 that are used for infrastructure purposes, <u>or to primary production.</u> Matters of discretion are restricted to: 1. the effective, efficient and safe operation of the transport network; and ~~2. the identified loading needs of the activity.~~
297.275	Parkside Holdings Ltd	Transport	TRAN-S8 Design requirements for loading spaces and vehicle standing spaces Loading spa	Oppose	Considers the standard inappropriate for rural conditions and imposes unnecessary discretion over loading needs. Also considers the standard relies on outdated and inaccessible standards, and should instead include clear, explicit provisions within the plan.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. Loading spaces and vehicle standing spaces required under TRAN-S5 must be designed, constructed and maintained in accordance with <u>[produce a specific standard in the text here]</u>.~~AS 2890.2.2002 Parking facilities Part 2: Off-street commercial vehicle facilities, for the specified minimum design vehicle.~~

						Matters of discretion are restricted to: 1. the effective, efficient and safe operation of the transport network; and ~~2. the identified loading and vehicle space needs of the activity.~~
297.276	Parkside Holdings Ltd	Transport	TRAN-S9 Accessible parking spaces Where parking spaces are provided on site: any on-si	Support	Support subject to submission(s) from disability advocate organisations, particularly regarding application to rural zones.	Seeks to retain with any amendments requested by disability advocate organisations and disabled people.
297.277	Parkside Holdings Ltd	Transport	TRAN-S10 Design requirements for on-site vehicle parking spaces Where parking spaces ar	Oppose	Considers the standard imposes design requirements that are unclear or unsuitable for rural and residential contexts and regulates internal site effects inconsistent with TRAN-O1.	Seeks to amend as follows: Where parking spaces are provided on a site: 1. car parking must comply with the requirements of [provide standard here] ~~AS 2890.1:2004 Parking facilities Part 1: Off-street car parking,~~ except for: a. a parking space in a garage or carport; or b. staff parking that is provided as stacked parking of no more than two vehicles, or c. parking for residential or primary production activity. ...
297.278	Parkside Holdings Ltd	Transport	TRAN-S11 Surface of parking and loading areas The surface of all parking and loading a	Oppose	Considers the standard imposes unnecessarily low thresholds and surface requirements on parking and loading areas in rural and residential zones, regulates internal site effects inconsistent with TRAN-O1, and conflicts with permitted pathways for multiple residential units.	Seeks to delete or include as advice note. Alternatively, seeks to amend as follows: 1. The surface of ~~all~~ parking and loading areas must either be: ... 2. Clause 1 does not apply where a site contains parking for ~~one~~ residential units or primary production activity.
297.279	Parkside Holdings Ltd	Transport	TRAN-S12 On-site cycle parking All developments, excluding residential units and prima	Oppose	Considers the standard inappropriately applies cycle parking requirements in rural areas where cycling is impractical and potentially unsafe, and is overly prescriptive in its design standards.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. All developments, excluding residential units and primary production, ~~must~~ should provide cycle parking at a rate of 1 cycle parking for every 10 car parking spaces provided; and 2. cycle parking ~~must~~ should meet the following minimum specifications: a. cycle parking facilities ~~must~~ should be: i. signposted or visible to cyclists entering the site; and ~~ii. located as close as possible to, and no more than 15m from at least one main pedestrian public entrance to the building/activity; and~~ iii. located so they do not impede pedestrian thoroughfares, including areas used by people whose mobility or vision is restricted; and iv. clear of vehicle parking or manoeuvring areas; ~~b. cycle parking facilities must be available during the activity's hours of operation and must not be impeded by any structure,~~

						~~storage of goods, landscape planting or other use; and~~ ~~c. long stay cycle parking facilities (for staff or residents) must be located:~~ ~~i. in a covered area; and~~ ~~ii. in an area where access by the general public is generally excluded.~~ ~~Note: Refer to the Austroads Bicycle Parking Facilities: Guidelines for design and installation: October 2-16 (AP-R527-16).~~ Matters of discretion are restricted to: ... 4. whether cycling is a safe method of transport to the site.
297.280	Parkside Holdings Ltd	Transport	TRAN-S13 Width and number of vehicle crossings onto roads Every lot with direct vehicl	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
297.281	Parkside Holdings Ltd	Transport	TRAN-S14 Formation and sealing of vehicle crossings All vehicle crossings onto a seale	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
297.282	Parkside Holdings Ltd	Transport	TRAN-S15 Distance between vehicle crossings and road intersections the distance betwee	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice
297.283	Parkside Holdings Ltd	Transport	TRAN-S16 Sight distances from vehicle crossings Any vehicle crossing onto a road other	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
297.284	Parkside Holdings Ltd	Transport	Table 6 – High trip generator thresholds	Support	Supports the thresholds with modification to raise the lower limits, as considers there is no technical evidence supporting the current thresholds and managing effects through vehicle movements is more appropriate. Also considers that valuable services such as emergency, healthcare, education, recreation, and community facilities should be given higher permitted thresholds to reduce consent barriers and better reflect their social importance.	Seeks to incorporate management of the effects from publicly owned or funded educational facilities managed by TRAN-R8 when a road needs upgraded to meet effects from an exceeded threshold. [refer to original submission for full relief sought]
297.285	Parkside Holdings Ltd	Transport	Table 7 – Minimum legal widths and formation requirements for private ways/access lots	Oppose	Considers the table unnecessarily duplicates TRAN-S2 by applying minimum legal widths and formation requirements to private ways, manages only internal site effects, and relies on inaccessible standards without supporting technical evidence.	Seeks to amend as follows: Table 7 – Minimum legal widths and formation requirements for ~~private ways/~~access lots
297.286	Parkside Holdings Ltd	Energy	General	Oppose	Considers that the chapter does not adequately reflect the benefits and low environmental impact of renewable energy and places excessive consent burdens on activities that should be encouraged, especially those generating electricity at the point of consumption to reduce demand on large-scale infrastructure.	Seeks for the chapter to reflect the benefits and low environmental impact of renewable energy and to reduce consent burdens on these activities [inferred relief requested].

297.287	Parkside Holdings Ltd	Energy	ENG-O1 Recognising the benefits of renewable electricity generation The significant local,	Support	No specific reasons given	Retain as notified
297.288	Parkside Holdings Ltd	Energy	ENG-O2 Design and location of renewable electricity generation Renewable electricity ge	Support	No specific reason given	Retain as notified
297.289	Parkside Holdings Ltd	Energy	ENG-O3 Protecting the values and qualities of any overlay Waitaki District's overlays a	Oppose	Considers that not all overlays are equal and not all renewable energy methods are equal.	Seeks to amend as follows: ENG-O3 Protecting the values and qualities of ~~any~~ overlay Waitaki District's overlays are protected as far as practicable from ~~the~~ any significant adverse effects of renewable electricity generation activities.
297.290	Parkside Holdings Ltd	Energy	ENG-P1 Recognising the benefits of renewable electricity generation Recognise the local, r	Support	No specific reason given	Retain as notified
297.291	Parkside Holdings Ltd	Energy	ENG-P2 Existing activities Enable the ongoing refurbishment, maintenance and repair, an	Support	No specific reason given	Retain as notified
297.292	Parkside Holdings Ltd	Energy	ENG-P3 Effects on renewable electricity generation activities Only allow new sensitive act	Support	No specific reason given	Retain as notified
297.293	Parkside Holdings Ltd	Energy	ENG-P4 Small scale renewable electricity generation activities and investigation activities ou	Support	Supports with amendments to also enable small scale renewable electricity generation activities within overlays, particularly extensive overlays such as ONL and RSL where entire properties are affected. Considers energy-related overlays (e.g., National Grid yard, Waitaki Power Scheme) should not restrict renewable energy generation and that natural hazard overlays are generally irrelevant to renewable energy effects beyond structural limitations. Considers small-scale renewable energy generation should be enabled across all overlays, with large-scale activities controlled only within identified overlays. Also considers that the PDP should "recognise and provide for" small-scale renewable electricity generation to align with the NPS-REG.	Seeks to amend as follows: ENG-P4 Small scale renewable electricity generation activities and investigation activities ~~outside of overlays~~ ~~Enable~~ Recognise and provide for small scale renewable electricity generation activities and activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation activities, ~~where:~~ ~~1. it is of a form, location and scale that minimises adverse effects on the environment; and~~ ~~2. it is consistent with the anticipated amenity values and character of the zone; and~~ ~~3. where it is demonstrated that all adverse effects on an overlay cannot be avoided, it appropriately offsets or compensates the adverse effects.~~

297.294	Parkside Holdings Ltd	Energy	ENG-P5 Small scale renewable electricity generation activities and investigation activities in	Oppose	Considers that small-scale renewable energy generation should be provided for under the NPS-REG as its effects are minor and existing overlay chapters already manage structural impacts. Considers that discouraging such activities may lead to greater reliance on large-scale projects with more significant effects.	Seeks to delete the policy. Alternatively, seeks to amend as follows: ~~Only allow~~ Recognise and provide for small scale renewable electricity generation activities and activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation activities within an overlay where: 1. if located on buildings, items and sites identified in SCHED2 – Historic Heritage Items, SCHED3 – Character Contributing Buildings and non-contributing buildings where the building is a character contributing building, and SCHED5 – Sites and Areas of Significance to Māori: a. its location is sympathetic to the identified values where practicable; and b. ~~any structure is not visible from any adjoining public place and~~ where practicable, is aligned with the plane of the roof where located on a roof; 2. if located within the root protection area of a tree identified in SCHED4 - Notable Trees, the work will not likely compromise the long-term health, natural life or values of the Notable Tree; ... ~~5. it is demonstrated that all adverse effects on the values of the relevant overlay cannot be avoided, it appropriately offsets or compensates the adverse effects.~~
297.295	Parkside Holdings Ltd	Energy	ENG-P6 Large scale renewable electricity generation activities Provide for large scale	Support	Considers that large scale activities have more significant effects and it is appropriate to manage them.	Retain as notified
297.296	Parkside Holdings Ltd	Energy	ENG-P7 Large scale renewable electricity generation activities in other zones and within overl	Support	Considers that large scale activities have more significant effects and it is appropriate to manage them.	Retain as notified
297.297	Parkside Holdings Ltd	Energy	ENG-P8 New technology Recognise the opportunity for new technology in renewable electri	Support	No specific reason given	Retain as notified
297.298	Parkside Holdings Ltd	Energy	ENG-P9 Decommissioning of renewable electricity generation activities Require that, during	Support	No specific reason given	Retain as notified
297.299	Parkside Holdings Ltd	Energy	ENG-R1 The operation, maintenance, and refurbishment of existing renewable electricity generat	Support	No specific reason given	Retain as notified
297.300	Parkside Holdings Ltd	Energy	ENG-R2 The operation, maintenance, and	Support	No specific reason given	Retain as notified

			refurbishment of existing renewable electricity generat			
297.301	Parkside Holdings Ltd	Energy	ENG-R3 Small scale renewable electricity generation activities outside of an overlay Al	Support	Support but considers it should also apply within overlays subject to the provisions of the relevant chapter in that overlay.	Seeks to amend as follows: ENG-R3 Small scale renewable electricity generation activities ~~outside of an overlay~~
297.302	Parkside Holdings Ltd	Energy	ENG-R4 Investigation activities outside of an overlay All zones Activity status: Perm	Support	No specific reason given	Retain as notified
297.303	Parkside Holdings Ltd	Energy	ENG-R5 Small scale renewable electricity generation activities and investigation activities in	Oppose	Considers small-scale renewable generation should be permitted activities as they are low impact and a restricted discretionary status adds disproportionate costs that discourage such activities and conflict with the NPS-REG.	Seeks to delete the rule and manage with ENG-R3. Alternatively, seeks to amend to a controlled activity [refer to original submission for full relief sought]
297.304	Parkside Holdings Ltd	Energy	ENG-R6 Small scale renewable electricity generation activities and investigation activities wi	Support	No specific reason given	Retain as notified
297.305	Parkside Holdings Ltd	Energy	ENG-R7 Large scale renewable electricity generation activities General Rural Zone Act	Oppose	Considers that renewable energy as a non-complying activity across overlays contradicts the NPS-REG, especially where overlays are intended for energy generation, and given that adverse effects are already managed by other chapters, the activity should be (restricted) discretionary.	Seeks to amend as follows: Activity status: <u>Restricted</u> Discretionary [refer to original submission for full relief sought]
297.306	Parkside Holdings Ltd	Energy	ENG-R8 Other renewable electricity generation activities not otherwise provided for All	Oppose	Considers the rule is unclear in scope and appears to pre-emptively control assumed future effects without justification and this will discourage innovation and renewable energy generation contrary to the NPS-REG. Considers any necessary controls should be addressed in relevant chapters only when actual effects are known.	Seeks to delete ENG-R8 and manage the effects within the relevant zone or overlay chapter.
297.307	Parkside Holdings Ltd	Energy	ENG-S1 Small scale solar panels All zones The panel must not exceed the permitted bu	Support	No specific reason given	Retain as notified
297.308	Parkside Holdings Ltd	Energy	ENG-S2 Small scale roof mounted wind turbines All zones The turbine (including the f	Support	No specific reason given	Retain as notified
297.309	Parkside Holdings Ltd	Energy	ENG-S3 Small scale freestanding wind turbines General Rural Zone Special Purpose Zo	Support	No specific reason given	Retain as notified
297.310	Parkside Holdings Ltd	Energy	ENG-S4 Small scale hydro generators General Rural Zone Rural Lifestyle Zone Industr	Support	Supports with amendments as the 200m^2 limit is too restrictive for stored water and the dam height is better regulated under the Dam Safety Regulations 2022. Considers the matters of discretion vague, such as 'suitability of the site' and lack clarity and	Seeks to amend as follows:

					justification, especially when many dams relate to existing water bodies or irrigation systems.	1. The maximum surface area of any stored water solely for hydro electricity does not exceed 200m2; and 2. the maximum height of a weir or dam solely for hydro electricity does not exceed 2m; and 3. the maximum installed capacity does not exceed 4 megawatts (MW). Matters of discretion are restricted to: ... ~~3. the suitability of the site for the proposed activity; and~~ ...
297.311	Parkside Holdings Ltd	Earthworks	EW(Q)-S2 Setback from a site boundary General Rural Zone Special Purpose Zone – Macra	Support	Supports the setback standard for farm quarries but considers the required distance from neighbouring properties should be reduced as considers it is excessive and limits quarry location options. Further notes that the remaining land is less suitable due to high groundwater and being in the middle of paddocks.	Seeks to amend setback to 20m consistent with the set back from waterways. Seeks to amend as follows: 1.New Farm quarries and new restricted use quarries must not be located within ~~100m~~ 20m of a residential activity on an adjoining site under different ownership from that of the land on which the farm quarry or restricted use quarry is located. 2. On sites adjoining a Residential or Settlement Zone boundary, the setback shall be at least 300m from the boundary for any new quarry, including restricted use quarry and farm quarry.
297.312	Parkside Holdings Ltd	NOIC – North Otago Irrigation Company Limited	North Otago Irrigation Scheme Designation Unique Identifier NOIC-1 Designation P	Support	Support the designation.	Retain as notified
297.313	Parkside Holdings Ltd	Earthworks	EW(Q)-R6 Quarrying activities (excluding farm quarry and restricted use quarry) General	Support	Support in part EW(Q)-R6. Considers that this rule should only apply to new quarries to achieve EW(Q)-P4 [Refer to original submission for full reasons].	Seeks to amend as follows: EW(Q)-R6 NewQuarrying activities (excluding farm quarry and restricted use quarry)
297.314	Parkside Holdings Ltd	SCHED9 – Schedule of Significant Natural Features	Ref. Significant Natural Feature Description Values and Characteristics	Oppose	[refer to original submission]	[refer to original submission]
298.1	Alastair and Carrie Gibson	Strategic Direction	General	Support	In general support of Strategic Direction chapter, in particular the historical and cultural identity and values, and the rural areas. [Refer to original submission for full reasons]	Retain as notified
298.2	Alastair and Carrie Gibson	Definitions	Agricultural intensification in relation to the Ecosystems and Indigenous Biodiversity c	Oppose	[Refer to original submission for full reasons]	[Refer to original submission for full relief sought] Seeks to add a new definition as follows:

						~~Agricultural intensification~~:High rate irrigation: in relation to the~~Ecosystems and Indigenous Biodiversity chapter, Natural Features and Landscapes chapter, and the~~ Sites and Areas of Significance to Māori chapter where rock art is identified, means change from non-irrigated primary production (including plantation forestry) to ~~irrigated~~ agricultural production that is irrigated to a depth more than 10mm, or not controlled by a Freshwater Farm Plan on land that is not currently irrigated as of 1st March 2025. ~~It also includes any change from irrigated crop and seed production to dairy farming.~~
298.3	Alastair and Carrie Gibson	Definitions	Commercial activity NPS means any activity trading in goods, equipment or services. It	Oppose	Considers the definition captures not-for-profit and charity trading unlikely to be of a scale to cause significant adverse effects.	Seeks to amend as follows: Commercial activities: means any activity trading in goods, equipment or services for profit....
298.4	Alastair and Carrie Gibson	Definitions	Farm building means a building used for the exercise of farming activities and excludes:	Oppose	Considers the term 'primary production activities' should be used consistently in the PDP.	Seeks to amend as follows: means a building used for the exercise of ~~farming~~ primary production activities and excludes: ...
298.5	Alastair and Carrie Gibson	Definitions	Farm track An un-sealed private track serving permitted agricultural or forestry activit	Oppose	Considers that the definition of farm track should also include those serving consented activities and that sealed farm tracks offer environmental benefits such as reducing sediment loss and controlling dust. Considers that the term 'primary production activity should be used as there is no definition for 'agricultural' activity.	Seeks to amend as follows: An un-sealed or sealed private track serving ~~permitted agricultural or forestry~~ primary production activities.
298.6	Alastair and Carrie Gibson	Definitions	Hazardous facility means a facility or activity that involves the use, storage or dispos	Oppose	No specific reason given.	Retain as notified
298.7	Alastair and Carrie Gibson	Definitions	Heritage professional means a person with a degree or recognised post-graduate qualifica	Amend	Considers the phrase 'recognised postgraduate qualification' too vague, as it doesn't specify who recognises it or how.	Seeks to amend as follows: means a person with a degree or ~~recognised~~ post-graduate qualification in a field related to heritage conservation or management...
298.8	Alastair and Carrie Gibson	Definitions	Identified taoka has the same meaning as in the National Policy Statement on Indigenous	Oppose	Considers that there should be a schedule or list of acknowledged or identified taoka as the PDP's use of the term 'taoka' is ambiguous, making it unclear whether references are to identified or acknowledged taoka.	Seeks to add a schedule of identified taoka and acknowledged taoka into the PDP. Remove provisions for taoka until a list is provided and provisions can be submitted on.
298.9	Alastair and Carrie Gibson	Definitions	Intensive outdoor primary production means primary production activities involving the	Oppose	Considers that the definition is vague and open to subjective interpretation and that the terms 'regular' and 'substantially provided other than from the site concerned' should be defined.	Seeks to amend as follows: Intensive outdoor primary production means primary production activities involving the keeping or rearing of livestock, or commercial aquaculture, where the ~~regular~~ majority feed source

						for the production of goods is ~~substantially~~ provided other than from the site concerned... It excludes the following: ... e. Primary production activities when a drought is declared
298.10	Alastair and Carrie Gibson	Definitions	Pervious surface means any part of a site which is grassed or planted in trees or shrubs	Oppose	Considers that other surfaces may be pervious such as stones or other types of garden.	Seeks to amend as follows: Pervious surface means any part of a site which ~~is grassed or planted in trees or shrubs and~~ is capable of absorbing water including soft landscaping, grass and planted trees or shrubs.. It does not include impervious surfaces or any area which: ...
298.11	Alastair and Carrie Gibson	Definitions	Potentially high-impact industrial activities means industrial activities that because o	Oppose	Considers the definition to be broad, unintentionally including hunting, home kill, and septic tanks, which are low-impact and may duplicate regional consent requirements. Additional consent burdens may discourage the development of quality housing and affordable food production.	Seeks to amend as follows: ... 2.commercial and non-pest species meat processing, or ~~any~~ associated processing of meat and meat by-products, or co-products; ... 10. storage and disposal of sewage, septic tank sludge, or refuse other than at the source;
298.12	Alastair and Carrie Gibson	Definitions	Recreational activity means the use of land and/or buildings for the purpose of active o	Oppose	Considers that the definition is circular as it uses 'recreation' within the definition itself.	Seeks to amend as follows: Recreational activity: means the use of land and/or buildings for the purpose of active or passive enjoyment of organised sports, ~~recreation~~ or entertainment. Excludes any recreational activity within the meaning of residential activity.
298.13	Alastair and Carrie Gibson	Definitions	Regionally significant infrastructure is: strategic land transport network and arterial	Support	Supports the definition	Retain as notified
298.14	Alastair and Carrie Gibson	Definitions	Repair workshop means the mechanical repair and servicing of motor vehicles (includes mo	Oppose	Considers that if the definition was applied outside of the Local Centre Zone it could include farm and residential workshops.	Retain as notified - but only in the LCZ. If used in other zones, seeks to amend as follows: Repair workshop means the commercial mechanical repair and servicing of motor vehicles (includes motorcycles, caravans, boat motors, trailers) inside a building.

298.15	Alastair and Carrie Gibson	Definitions	Sensitive environment area of land contained within any of the following areas: Coa	Oppose	Considers that the district plan has no jurisdiction on airspace and that the correct term for the height of land above sea level is 'elevation'.	Seeks to delete clause (11) or amend as follows: 11. Above 900 metres in ~~altitude~~ elevation
298.16	Alastair and Carrie Gibson	Definitions	Riparian margin means: for land in the General Rural Zone, all landward property adjo	Oppose	Considers the definition is inconsistent with other measures under the RMA which manage similar sediment issues such as the regulations controlling intensive winter grazing which have a 5m buffer.	Seeks to amend as follows: 1. ~~for land in the General Rural Zone,~~ all landward property adjoining and within ~~20~~ 5 metres of the boundary of the bed of a river or lake, or of the edge of a wetland; ~~and~~ 2. for land outside the General Rural Zone, all landward property adjoining and within 10 metres of the boundary of the bed of a river or lake, or of the edge of a wetland.
298.17	Alastair and Carrie Gibson	Definitions	Temporary activity means activities and their ancillary buildings and structures that ar	Support	Supports the definition but considers that the undefined term 'helicopter' could be interpreted too broadly and include anything from a drone, gyrocopter through to high impact military helicopters which require support services. Considers that the term 'aircraft' is appropriate to use as it encompasses helicopters, drones, gyrocopters, and fixed-wing aircraft.	Seeks to amend clause (6) as follows: 6. temporary ~~helicopter~~ aircraft take-offs and landings; and
298.18	Alastair and Carrie Gibson	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Considers that the term 'chemical' [clause (6)] is too broad and could include harmless substances like water or atmospheric gases and that requiring proof of a change to the hydrological balance is impractical, as baseline data is not generally available. Considers that many of the listed effects may occur accidentally or naturally, and the wording should allow for such occurrences. Considers it ambiguous whether cushionfield [clause (8)] is the competitor or the outcompeted species referred to. Also considers the reference to mob-stocking [clause (10)] is unclear and potentially contradictory, as grazing is excluded from the definition and is often beneficial to ecosystems - suggests using the term 'pugging' as an alternative. Considers that the term 'established farming practice' lacks a clear method or explanation for how it is determined. Considers that restrictions on indigenous vegetation removal may disincentivise new plantings and will be more expensive to establish than exotic species (which also offer better returns under the Emissions Trading Scheme) and would also limit access to non-threatened indigenous species like manuka, which are valuable for low-cost home heating.	Seeks to amend as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation established as at 1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate: 1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of ~~chemicals~~ harmful substances including herbicide; 7. burning; 8.~~the deliberate~~ application of water, fertiliser or oversowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion, ~~including dryland cushionfield species;~~ 9.~~the~~ drainage of mapped wetlands or lakes; ~~10. mob-stocking; and~~ 11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site;~~ b. walking;

						c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood
298.19	Alastair and Carrie Gibson	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried (not mined). Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	Seeks to amend as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones,~~ and a prescribed substance within the meaning of the Atomic Energy Act 1945
298.20	Alastair and Carrie Gibson	Mana whenua	General	Support	Support in part [Refer to original submission for full reasons]	Retain as notified
298.21	Alastair and Carrie Gibson	Mana whenua	Consultation with mana whenua	Support	Supports in part. Support is expressed for clearly identifying when mana whenua may be affected by a proposal. Considers that where iwi consultation is encouraged, costs should be recoverable and that for matters of national importance (including mana whenua, historic heritage, natural features, ecosystems, and natural hazard), costs should be publicly funded, not charged to individual applicants. Considers that specifying applicant fees is outside the scope of the PDP and that consultation processes should be guided by memorandums of understanding or similar, as recommended in the SASM Section 32 report.	Seeks to remove reference to applicants being charged fees for consultation and for a memorandum of understanding to be consulted on prior to further submissions.
298.22	Alastair and Carrie Gibson	Natural Hazards	NH-O1 Natural hazard risk The risks from natural hazards, including the effects of climate	Support	Supports with modifications to include proportionality of the avoidance and mitigation to the level of risk.	Seeks to amend as follows: The impact on people, property and the environment from the risks of natural hazards and the effects of climate change are recognised, avoided or mitigated relative to the level of risk.
298.23	Alastair and Carrie Gibson	Natural Hazards	NH-P1 Identification of natural hazard areas As information becomes available, identify an	Support	Support in part with modification to better focus the policy.	Seeks to amend as follows: As information becomes available, identify and map land that ~~may~~ is known to be subject to natural hazards, including taking into account the effects of climate change.
298.24	Alastair and Carrie Gibson	Natural Hazards	NH-P2 Risk based approach Avoid subdivision, use and development in areas where natural	Support	No specific reasons given.	Retain as notified
298.25	Alastair and Carrie Gibson	Natural Hazards	NH-P3 Critical facilities and regionally significant infrastructure Avoid locating critica	Support	No specific reasons given	Retain as notified
298.26	Alastair and Carrie Gibson	Natural Hazards	NH-P4 Natural protection features Encourage the use, protection, maintenance and enhanc	Support	Support with recommendation to expand scope to explicitly require engineering solutions where natural protection features are unsuitable, particularly in cases involving the protection of infrastructure, people, and property, where more reliable methods may be necessary.	Seeks to amend as follows: Encourage the use, protection, maintenance and enhancement of natural features, buffers and systems, such as wetlands and

						vegetation, which provide protection from natural hazard risk where engineering solutions are not required to mitigate risk to people, property and infrastructure.
298.27	Alastair and Carrie Gibson	Natural Hazards	NH-P13 Other natural hazard awareness overlays Encourage proposals for subdivision, use an	Support	Supports in part but considers an assessment should not be required in all cases, especially when there's no evidence that a specific use is at risk from an awareness overlay. Considers there is no clear definition of what constitutes an 'acceptable level' of risk and who determines it.	Seeks to amend as follows: Encourage proposals for subdivision, ~~use~~ and development in a natural hazard awareness overlay to undertake an assessment of natural hazard risk and incorporate any methods to reduce or mitigate the risk. ~~to an acceptable level.~~ Alternatively, if 'use' is to remain, seeks to amend as follows: Encourage proposals for subdivision, use and development in a natural hazard awareness overlay to ~~undertake an assessment~~ consider the effects of natural hazard risk and incorporate methods to reduce or mitigate the risk ~~to an~~ acceptable level.
298.28	Alastair and Carrie Gibson	Natural Hazards	NH-R1 Buildings, structures and fences in the Otago Flood Assessment Overlay All zones	Oppose	Considers the definition should acknowledge that other farm structures, like poles or irrigation infrastructure, are not more flood-prone or hazardous than those already listed, and may even mitigate risk. Considers the term 'suitably qualified and experienced professional' should be clarified.	Seeks to amend as follows: PER-1 The building or structure is: ... 3. an unenclosed building without a floor or with a concrete floor; or ... 6. a pole; or 7. irrigation or stockwater infrastructure Seeks clarification on the term 'suitably qualified and experienced professional'
298.29	Alastair and Carrie Gibson	Natural Hazards	NH-R2 Buildings, structures and fences in the Canterbury Flood Assessment Overlay All z	Oppose	Considers the definition should acknowledge that other farm structures, like poles or irrigation infrastructure, are not more flood-prone or hazardous than those already listed, and may even mitigate risk.	Seeks to add provision for other floors in buildings and structures like poles and water infrastructure.
298.30	Alastair and Carrie Gibson	Natural Hazards	NH-R4 Earthworks excluding land disturbance in all Flood Assessment Overlays All zones	Support	Supports with recommendation to permit the building of tracks.	Seeks to amend as follows: PER-3 The earthworks are for the construction of a farm track.
298.31	Alastair and Carrie Gibson	Natural Hazards	NH-R6 Land use activities in the Canterbury Flood Assessment Overlay, the Otago Flood Assessme	Support	Supports with recommendation to add other uses which are compatible with the objectives and policies of the Natural Hazards chapter such as airstrips and helicopter take off and landing areas.	Seeks to amend as follows: 5. Aeroplane airstrips and helicopter take off and landing areas.

298.32	Alastair and Carrie Gibson	Natural Hazards	NH-P5 Site specific assessment/investigation A risk assessment will be required for subdiv	Support	No specific reasons given	Retain as notified
298.33	Alastair and Carrie Gibson	Natural Hazards	NH-P6 Canterbury Flood Assessment Overlay Except as provided for in NH-P3, avoid subdiv	Support	No specific reasons given	Retain as notified
298.34	Alastair and Carrie Gibson	Natural Hazards	NH-P7 Otago Flood Assessment Overlay and Waitaki River Floodplain Assessment Overlay Ex	Support	No specific reasons given	Retain as notified
298.35	Alastair and Carrie Gibson	Natural Hazards	NH-P11 Liquefaction Assessment Overlay Provide for subdivision in the Liquefaction Assessm	Support	No specific reasons given	Retain as notified
298.36	Alastair and Carrie Gibson	Natural Hazards	NH-P12 Wildfire – subdivision and land use Ensure that subdivision and land use in area	Support	No specific reasons given	Retain as notified
298.37	Alastair and Carrie Gibson	Natural Hazards	NH-R3 Buildings, structures and fences in the Waitaki River Floodplain Assessment Overlay	Oppose	Considers the definition should acknowledge that other farm structures, like poles or irrigation infrastructure, are not more flood-prone or hazardous than those already listed, and may even mitigate risk	Seeks to add provision for other floors in buildings and structures like poles and water infrastructure.
298.38	Alastair and Carrie Gibson	Natural Hazards	NH-R13 Wildfire – woodlots, shelterbelts, plantation forestry and buildings All zones	Amend	Supports with modification to encourage the planting of low flammability plants, particularly near houses.	Seeks to amend as follows: PER-4 The woodlot , shelterbelt or plantation forestry is a species listed in the FENZ Low Flammability Plant Directory.
298.39	Alastair and Carrie Gibson	Hazardous Substances	General	Support	Support for chapter and definitions	Retain as notified
298.40	Alastair and Carrie Gibson	Historic Heritage	HH-O1 Protection of historic heritage The District's historic heritage is recognised, main	Support	No specific reasons given	Retain as notified
298.41	Alastair and Carrie Gibson	Historic Heritage	HH-O2 Use and adaptive re-use of historic heritage Historic Heritage Items and their herit	Support	Supports noting that primary production is sympathetic re-use of the heritage settings where existing.	Retain as notified
298.42	Alastair and Carrie Gibson	Historic Heritage	HH-P1 Recognise historic heritage Identify Historic	Support	Support with recommendation to recognise landowners' interests and consent in heritage protection. Considers heritage protection	Seeks to amend as follows:

			Heritage Items and their associated		to be more effective when landowners are constructively engaged and permission is required for listing.	With landowner permission, identify Historic Heritage Items and their associated heritage settings throughout the Waitaki district that warrant protection in SCHED2 – Historic Heritage Items, and are significant in terms of one or more of the following values:...
298.43	Alastair and Carrie Gibson	Historic Heritage	HH-P2 Historic heritage scheduling Classify Historic Heritage Items and their associate	Support	No specific reasons given	Retain as notified
298.44	Alastair and Carrie Gibson	Historic Heritage	HH-P3 Benefits of active use, adaptive re-use, and protection of historic heritage Recogni	Support	Support in the context of re-use being primary production.	Retain as notified
298.45	Alastair and Carrie Gibson	Historic Heritage	HH-P4 Heritage maintenance Enable the use and heritage maintenance of the Historic Heri	Support	Support in the context of re-use being primary production.	Retain as notified
298.46	Alastair and Carrie Gibson	Historic Heritage	HH-P5 Modern service attachments Enable attachments to Historic Heritage Items included	Support	No specific reasons given	Retain as notified
298.47	Alastair and Carrie Gibson	Historic Heritage	HH-P6 Heritage restoration Control the heritage restoration of Historic Heritage Items	Support	No specific reasons given	Retain as notified
298.48	Alastair and Carrie Gibson	Historic Heritage	HH-P7 Retaining historic heritage – earthquake and flooding resiliency Encourage earthquak	Support	No specific reasons given	Retain as notified
298.49	Alastair and Carrie Gibson	Historic Heritage	HH-P8 Protecting historic heritage from inappropriate heritage alterations Provide for	Support	No specific reasons given	Retain as notified
298.50	Alastair and Carrie Gibson	Historic Heritage	HH-P9 Relocation of Historic Heritage Items within or beyond their heritage setting Allow	Support	No specific reasons given	Retain as notified
298.51	Alastair and Carrie Gibson	Historic Heritage	HH-P10 Demolition or destruction of Category B Historic Heritage Items Only allow the d	Support	No specific reasons given	Retain as notified
298.52	Alastair and Carrie Gibson	Historic Heritage	HH-P11 Demolition or destruction of Category A Historic Heritage Items Avoid the demolitio	Support	No specific reasons given	Retain as notified

298.53	Alastair and Carrie Gibson	Historic Heritage	HH-P12 Buildings and structures within heritage settings Only allow new buildings and s	Support	No specific reasons given	Retain as notified
298.54	Alastair and Carrie Gibson	Historic Heritage	HH-P13 Subdivision of sites containing Historic Heritage Items Only allow subdivision o	Support	No specific reasons given	Retain as notified
298.55	Alastair and Carrie Gibson	Historic Heritage	HH-P14 Planning incentives to encourage the sustainable use of Historic Heritage Items Ass	Support	No specific reasons given	Retain as notified
298.56	Alastair and Carrie Gibson	Historic Heritage	HH-P15 Future consideration of historic heritage Council continues to investigate the iden	Oppose	Considers this to be a council matter, not a planning matter as future councils may have different priorities and should not be bound by past policies or required to undertake a plan change between cycles.	Seeks to delete the policy.
298.57	Alastair and Carrie Gibson	Historic Heritage	HH-R1 Heritage maintenance on Historic Heritage Items listed in SCHED2 – Historic Heritage Ite	Support	No specific reasons given	Retain as notified
298.58	Alastair and Carrie Gibson	Historic Heritage	HH-R2 Animal grazing on sites and their heritage setting identified in SCHED2 – Historic Herit	Support	Supports in the context of a working farm.	Retain as notified
298.59	Alastair and Carrie Gibson	Historic Heritage	HH-R3 Earthworks within the heritage setting of a Historic Heritage Item listed in SCHED2 – Hi	Support	Supports in the context of a working farm.	Retain as notified
298.60	Alastair and Carrie Gibson	Historic Heritage	HH-R5 New buildings, structures and signs, or alterations to an existing building or structure	Support	Support with suggested modifications to reflect the practical needs of heritage items located in a rural contexts where structures like fences and pipes are necessary for primary production.	Seeks to amend as follows: PER 1 Any new building, structure or sign is: … <u>5. is a post and wire or post and rail fence; or</u> <u>6. is irrigation or stock water infrastructure; or</u>
298.61	Alastair and Carrie Gibson	Historic Heritage	HH-R12 Relocation of a Category B Historic Heritage Item listed in SCHED2 – Historic Heritage	Support	No specific reason given	Retain as notified
298.62	Alastair and Carrie Gibson	Historic Heritage	HH-R13 Relocation of a Category A Historic Heritage Item listed in SCHED2 – Historic Heritage	Oppose	Considers that the relocation of heritage items can sometimes improve their condition or address health and safety risks (for example the Herbert War Memorial) and that making consent too difficult may increase the risk of demolition by neglect.	Seeks to amend HH-R13 to a discretionary activity.
298.63	Alastair and Carrie Gibson	Historic Heritage	HH-R14 Any demolition of a Historic Heritage Item listed in	Oppose	Considers this to be a council matter, not a planning matter as future councils may have different priorities and should not be	Seeks to delete HH-M1

			SCHED2 – Historic Heritage Items		bound by past policies or required to undertake a plan change between cycles.	
298.64	Alastair and Carrie Gibson	Historic Heritage	HH-R14 Any demolition of a Historic Heritage Item listed in SCHED2 – Historic Heritage Items	Support	Supports the intent but considers this to be a council matter rather than a planning matter.	Seeks to delete HH-M4
298.65	Alastair and Carrie Gibson	Notable Trees	General	Support	Support for the chapter	Retain as notified
298.66	Alastair and Carrie Gibson	Notable Trees	TREE-P5 Other trimming and pruning of Notable Trees Provide for any other trimming of N	Support	Support with modifications as not possible to confirm long-term impacts of trimming on tree health or lifespan in advance. Considers 'likelihood' is a more practical measure than certainty. Also considers that trimming may alter a tree's natural form, especially when removing diseased or hazardous limbs and that TREE-S1 should also be considered regarding the retention of natural form.	Seeks to amend as follows: Provide for any other trimming of Notable Trees where it can be demonstrated that the works do not: 1.likely compromise the long-term health of the Notable Tree; 2. compromise the identified values of the Notable Tree, listed in SCHED4 - Notable Trees; 3.likely reduce the natural life of the Notable Tree; 4. increase the risk of the Notable Tree being subject to wind damage; and 5. impact the natural shape and form of the Notable Tree more than necessary.
298.67	Alastair and Carrie Gibson	Notable Trees	TREE-S1 Trimming of Notable Trees All zones The maximum branch diameter being trimm	Support	No specific reason given	Retain as notified
298.68	Alastair and Carrie Gibson	Notable Trees	TREE-S2 Trimming or removal of Notable Trees posing a threat to people or property All	Support	No specific reason given	Retain as notified
298.69	Alastair and Carrie Gibson	Notable Trees	TREE-S3 Trimming or removal of Notable Trees All zones The works are undertaken or	Support	No specific reason given	Retain as notified
298.70	Alastair and Carrie Gibson	Notable Trees	TREE-R1 Maintenance of the ground within the root protection area of a Notable Tree All	Support	No specific reason given	Retain as notified
298.71	Alastair and Carrie Gibson	Notable Trees	TREE-R2 Trimming or pruning of a Notable Tree All zones Activity status: Permitted	Support	No specific reason given	Retain as notified
298.72	Alastair and Carrie Gibson	Notable Trees	TREE-R3 Removal of a Notable Tree All zones Activity status: Permitted Where: PER-1	Support	No specific reason given	Retain as notified

298.73	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	General	Oppose	[refer to original submission for full reasons]	[Refer to original submission for relief sought]
298.74	Alastair and Carrie Gibson	SCHED5 – Schedule of Sites and Areas of Significance to Maori	ID ref Name Description and Values SASM013 Maerewhenua Maerewhen	Oppose	Oppose in part Schedule 5. The property is encumbered with the following SASM overlays: SASM013 [refer to original submission for full reasons]	[Refer to original submission for relief sought]
298.75	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	General	Oppose	Considers that Freshwater Farm Plans are set to become the primary planning tool for farmland and aim to streamline consent processes by managing farming effects within a single plan under the RMA, and these may also incorporate SASM values. Considers that Freshwater Farm Plans retain a level playing field because the landowner is obligated to have it certified to carry out activities, while the iwi are obligated to consult with the landowner to advise on protection of their significant sites. Both obligations require good faith and genuine relationships rather than expensive consent burdens involving the district council.	Seeks to reduce consent burdens on landowners and allow them to plan directly with iwi in good faith through Freshwater Farm Plans.
298.76	Alastair and Carrie Gibson	Mana whenua	General	Oppose	Considers there to be a conflict of interest as the plan states that Aukaha helped draft the provisions and will also charge for consultation on them. Considers there needs to be a clear separation between plan-making and implementation.	Seeks that farms with a certified Freshwater Farm Plan (FWFP) include a chapter on SASM management, allowing for permitted activity status. Alternatively, consultation could be provided by a Suitably Qualified Person (SQP) with relevant qualifications and experience, promoting a competitive market and reducing workload for iwi.
298.77	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	General	Oppose	Considers the uncertainty of time and cost associated with consenting, particularly under the SASM provisions should be supported by a service level agreement. Considers that some issues are better addressed through RMA reform and that many Significant Natural Areas and Natural Features and Landscapes appear to have been mapped without proper landowner engagement.	Seeks for the withdrawal of the Sites and Areas of Significance to Māori, Natural Features and Landscapes, Natural Character and Ecosystems and Biodiversity Chapters until the RMA reform is complete and an MOU is in place with Aukaha detailing time and cost of consultation.
298.78	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-O1 Rakatirataka and kaitiakitaka The rakatirataka of mana whenua over their signif	Amend	Supports the intent with modification to clarify that the objective is not intended to be in isolation from the landowner. Considers that that the exercise of kaitiakitaka can't be implemented without agreement from the land owners who have their own rights and responsibilities within their own relationship with the land.	Seeks to amend as follows: The rakatirataka of mana whenua over their significant sites and areas is recognised and they are able to exercise kaitiakitaka within these areas <u>with agreement from the landowners.</u>
298.79	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-O2 Protection of wāhi tūpuna values The relationship of mana whenua with wāhi tūpuna	Support	Support for the objective particularly the goal of increasing community awareness of wāhi tūpuna values. Considers that landowners have historically maintained relationships with these sites without needing district plan provisions and that regulation is not necessary to sustain mana whenua connections.	Seeks that the values for protection need to be identified in the PDP.
298.80	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-O3 Preservation of tuhituhi neherā The integrity of tuhituhi neherā sites is prese	Support	No specific reasons given	Retain as notified

298.81	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-O4 Enhancement of mahika kai Mahika kai values are enhanced to support customary use.	Support	Support with modification to recognise that mahika kai values are maintained and where appropriate these values enhanced, as it may not always be possible to enhance.	Seeks to amend as follows: Mahika kai values are maintained or, enhanced where appropriate to support customary use.
298.82	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-O5 Access and use for customary purposes Mana whenua are able to access wāhi tūpuna f	Oppose	Considers the objective requires clarification that it does not imply a general right of access to wāhi tūpuna and that access should be with landowner permission. Considers the Trespass Act is impractical for managing access and may strain iwi–landowner relationships.	Seeks to amend as follows: Mana whenua are able to access, where appropriate, wāhi tūpuna for customary purposes and are able to use mahika kai resources in accordance with tikaka and with landowner agreement.
298.83	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-P1 Identification of wāhi tūpuna Working with mana whenua, identify, on Planning m	Support	No specific reason given	Retain as notified
298.84	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-P2 Mana whenua involvement in resource management processes Provide for the invol	Oppose	Considers the policy should clarify whether rules apply only where wāhi tūpuna values remain, or even where they've been physically altered but still hold cultural significance. Considers that consultation for all activities within or near wāhi tūpuna areas places a significant burden on landowners and mana whenua and the policy should be more targeted, directing consultation and notification to situations where it would meaningfully support the protection or enhancement of wāhi tūpuna values.	Seeks to amend the SASM overlay to map only where the values are known to still exist. If the maps cannot be changed, seeks to amend as follows: Provide for the involvement of mana whenua in resource management processes affecting identified wāhi tūpuna by encouraging consultation and engagement with mana whenua prior to undertaking activities which will have an adverse effect on the maintenance or enhancement of ~~or applying for resource consent within or adjoining~~ identified wāhi tūpuna.
298.85	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-P3 Management of wāhi tūpuna Only allow or provide for land use and development in id	Support	Support with amendment to provide for the protection of existing uses.	Seeks to amend as follows: ~~Only allow or provide for~~ Ensure new land use and development in identified wāhi tūpuna ~~where it~~ avoids significant adverse effects, and avoids, remedies or mitigates other adverse effects, on the remaining values associated with these areas, having particular regard to: ...
298.86	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-P4 Obstruction of mauka, tuhituhi neherā and wai māori by structures Avoid the loc	Support	Support is given in part to SASM-P4, with a preference for clearly identifying the locations of mauka, tuhituhi neherā, and wai māori on District Plan maps to guide where structures should be avoided. Considers provision should also be made for compatible structures that support land uses enhancing wāhi tūpuna values, and the policy should explicitly protect existing uses while avoiding vague terms like "or near."	Seeks to amend as follows: Avoid the location of new structures in riparian margins, on ~~or near~~ limestone outcrops, on upper slopes and on ~~or near~~ ridgelines unless: 1. they do not obstruct views to and across culturally significant waterbodies, tuhituhi neherā or mauka; and 2.~~they avoid adverse effects on the~~ the structure can maintain or enhance the wāhi tūpuna values of these areas.
298.87	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-P5 Protection of integrity of tuhituhi neherā	Oppose	Concerns with the assumptions in irrigation modelling used to assess impacts and considers evidence suggests water loss may be overestimated and low-rate irrigation can avoid adverse	Seeks to permit and encourage low rate irrigation and discourage high rate irrigation [refer to original submission].

			Avoid the following activities on, o		effects. Considers that while the intent to protect tuhituhi neherā is supported, the policy should acknowledge that some existing agricultural and forestry activities have been compatible with these values and may continue to be so.	Also seeks for the protection of existing uses to be explicitly provided for in SASM-P4. Seeks to amend as follows: Avoid the following new activities on areas mapped as, ~~or in close proximity to~~, limestone outcrops; 1.~~agricultural intensification~~ high rate irrigation; and 2. plantation forestry, unless any adverse effects on the integrity of tuhituhi neherā from disturbance of land and vegetation and changes in the water table, soil water environment and air moisture are avoided.
298.88	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-P6 Culturally incompatible activities Avoid degradation of the values of wāhi tūpu	Support	No specific reason given.	Seeks to retain as notified.
298.89	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-P7 Habitat restoration and enhancement Encourage restoration and enhancement of indig	Support	No specific reason given.	Seeks to retain as notified.
298.90	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-P8 Mahika kai activities Enable mana whenua to undertake mahika kai activities in ide	Support	Support in part with a request for modification, as the PDP does not grant general access rights or transfer ownership of mahika kai resources, and the current user notes lack legal standing and clarity on ownership. Considers the policy should be reworded to more accurately reflect how the objective will be achieved while fostering respectful relationships between landowners and iwi.	Seeks that the PDP should clarify that land owner permission is required to undertake mahika kai. Also seeks to amend as follows: Enable mana whenua to undertake mahika kai activities in identified wāhi tūpuna, in accordance with tikaka and with landowner agreement.
298.91	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-P9 Access for customary purposes Maintain existing access opportunities and encourage	Support	Support in part with a request to clarify that it does not create a general right of access to wāhi tūpuna on private land and that access should remain subject to landowner permission. Considers the policy should be reworded to reflect existing legal frameworks and practical considerations, ensuring respectful relationships and sustainable resource management.	Seeks to amend as follows: Maintain existing access opportunities and encourage enhancement of access, where appropriate, for mana whenua to identified wāhi tūpuna for customary purposes with landowner agreement.
298.92	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-P10 Wilding conifer species Protect wāhi tūpuna from modification by wilding conifer	Support	No specific reason given.	Seeks to retain as notified.
298.93	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-R1 Mahika kai activities within a wāhi tūpuna identified in SCHED5 – Sites and Areas of S	Support	Support in part with modifications.	Seeks to amend as follows: Activity status: Permitted Where:

						PER-1: An agreement is reached with the landowner permitting access and use of resources. Activity status when compliance is not achieved: ~~Not Applicable~~ Prohibited Note: The provisions in this rule do not override the provisions of the Trespass Act 1980. There is no general right of public access across private land or right to use private resources.
298.94	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-R2 Buildings and structures within a wāhi tūpuna identified in SCHED5 - Sites and Areas o	Oppose	Opposes in part, as the 200m^2 threshold lacks justification and may unnecessarily increase consent requirements, while compatible structures that support wāhi tūpuna values should be distinguished. A 6m height limit for buildings and 25m for structures such as silos is supported, and low-rate irrigation infrastructure should be permitted within 100m of limestone cliffs to avoid unintended environmental impacts. The rule should clarify restricted discretionary matters, avoid unnecessary expert assessments, and ensure access, alternatives, and enhancement requirements are practical and proportionate [refer to original submission].	Seeks to amend as follows: Activity status: Permitted Where: PER-1 The building or structure has a maximum building footprint of ~~200~~ 350m2; and PER-2 The building ~~or structure~~ has a maximum height of 6m as measured from the existing natural ground level;and PER-3 The structure has a maximum height of 25m; and ~~PER-3~~PER-4 The building or structure is not located within 20m of a waterbody or 50m of a wetland (excluding farm buildings or farm structures less than 10m2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating);and ~~PER-4~~PER-5 The building or structure is not located on, or within, 100m of a limestone escarpment (excluding farm buildings or farm structures less than 10m2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating); and ~~PER-5~~PER-6 The building or structure is not located on or within 20m vertical distance of a ridgeline (excluding farm buildings or farm structures less than 10m2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating); and ~~PER-6~~PER-7 The building or structure is located at an elevation less than 900m

						above sea level (excluding farm buildings or farm structures less than 10m2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating). Matters of discretion are restricted to: 1. whether the relevant rūnaka has been consulted, the outcome of that consultation, and the extent to which the proposal responds to, or incorporates the outcomes of that consultation; and 2. the ~~potential~~ adverse effects on the values of the wāhi tūpuna, and the relationship of mana whenua with the area, including: a. loss of wāhi tūpuna associations through modification of the landscape and natural processes; and ~~b. damage to the integrity of wāhi tūpuna through disturbance of land and/or indigenous vegetation; and~~ c. disturbance of wāhi tapu and archaeological sites; and d. adverse effects on the ~~integrity~~ preservation of tuhituhi neherā sites ~~including through disruption of the landform or water balance in the area;~~ and e. adverse effects on the mauri of waterbodies; and f. reduction in the extent and quality of mahika kai; and ~~g. loss of access to mahika kai for customary activities; and~~ 3. effects on sites where there is the potential for kōiwi or artefacts to be found, including consideration of the need to impose an accidental discovery protocol or have a cultural monitor present; and ~~4. whether there are alternative methods, locations or designs that would avoid or reduce the impact on the values associated with wāhi tūpuna; and~~ ~~5. the appropriateness of any mitigation measures, including monitoring, planting or improved access for customary use; and~~ ~~6. whether the proposal provides an opportunity to recognise mana whenua culture, history and identity associated with the wāhi tūpuna, and any potential to:~~ ~~a. affirm the connection between mana whenua and the wāhi tūpuna; or~~ ~~b. enhance the cultural values of the wāhi tūpuna~~ Activity status when compliance is not achieved:~~Non-Complying~~ Discretionary Where: ~~NC-1~~DIS-1 Compliance is not achieved with PER-3, PER-5 and/or PER-6 Notification: Any application made under RDIS-1 and/or NC-1 may be notified to Te Rūnanga o Moeraki
298.95	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-R3 Indigenous vegetation clearance within a wāhi tūpuna, identified in SCHED5 - Sites and	Support	Support with request to modify the rule so it does not discourage landowners from planting new indigenous vegetation, and to allow a permitted pathway for indigenous vegetation removal where landowners have certified Freshwater Farm Plans.	Seeks to amend as follows:

						PER-1 ... k. improved pasture ... PER-4 The indigenous vegetation was planted after 1st March 2025 and complies with a certified Freshwater Farm Plan.
298.96	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-R4 Earthworks within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significanc	Oppose	Oppose in part as it excludes earthworks for permitted building platforms and would create unnecessary consent requirements for routine activities, especially where SASM overlays cover farm bases and improved pasture with no archaeological value. The submitter suggests either removing SASM overlays from such areas or modifying the rule to increase earthworks thresholds (e.g., to 3m cut and 1,000m^2 area), manage effects through permitted activity criteria, and use boundary setbacks in residential settings, thereby reducing the consent burden while still protecting genuinely sensitive sites.	[refer to original submission for full relief sought] Seeks to amend as follows: [GRUZ/RLZ/OSZ]: PER-3 The permitted activity standards of EW-R1 are complied with; and PER-4 Earthworks are set back 100m from tuhituhi nehera and complies with a certified Freshwater Farm Plan; and PER-5 Earthworks are set back 20m from mahika kai resources; and PER-6 Access to mahika kai resources is not obstructed; and ... PER-9 The earthworks are associated with any permitted activity under SASM-R2. [GRZ/SETZ] Where: ~~PER-5~~PER-10 All earthworks where they comply with the following earthworks standards where relevant: 1. EW-S1 Threshold areas [submitting change to 1,000m]. 2. EW-S2 Maximum cut depth and fill height [submitting change to

						3m cut and fill depth];and 3. EW-S4 Earthworks within 20 metres of a waterbody
298.97	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-R5 Urupā within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significance to	Support	Support for existing urupā, but request that new urupā be treated the same as cemeteries due to similar environmental effects, while acknowledging their different cultural and spiritual significance.	Seeks to retain as notified.
298.98	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-R6 Amenity planting and shelterbelts within a wāhi tūpuna, identified in SCHED5 – Sites a	Support	Support but considers specific provision to permit existing shelterbelts within 100m of limestone escarpments is required.	Seeks to amend as follows: Where: PER-1 The new amenity planting or shelterbelt is not located on or within 100m of a limestone escarpment.
298.99	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-R7 Natural hazard mitigation structures within a wāhi tūpuna, identified in SCHED5 - Site	Support	Support with modification to allow a permitted pathway for councils or private applicants to create natural hazard structures, provided iwi are consulted to ensure any permitted activity pathway addresses potential effects on cultural values.	Seeks to amend as follows: Activity status:~~Restricted Discretionary~~ Permitted PER-1 Fish passage is not impeded. ~~Where:~~ ~~RDIS-1~~ ~~The structures are erected by, or on behalf of, Waitaki District Council, Otago Regional Council, or Canterbury Regional Council.~~ ~~Matters of discretion are restricted to:~~ ~~1. The matters of discretion listed in SASM-R2 RDIS-1.~~ Notification: Any application made under ~~this rule~~ DIS-1 may be notified to Te Rūnanga o Moeraki.
298.100	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-R8 Agricultural intensification within a wāhi tūpuna, identified in SCHED5 - Sites and Ar	Oppose	No specific reason given.	[refer to original submission and submission point 298.2]
298.101	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-R9 Commercial outdoor recreation within a wāhi tūpuna, identified in SCHED5 - Sites and A	Support	Support if SASM overlays are adjusted to exclude improved pasture, otherwise, opposes the rule as considers it unnecessarily restricts landowner diversification in less sensitive areas without clear evidence of adverse effects. Considers iwi oversight is justified for archaeological sites, but requiring consent for recreation in non-sensitive areas needs strong justification.	Seeks to delete the rule if the SASM mapping remains.
298.102	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-R10 Plantation forestry activities within a wāhi tūpuna, identified in SCHED5 - Sites and	Support	No specific reason given.	Seeks to retain as notified.

298.103	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-R11 Mining activities, farm quarries or quarrying activities within a wāhi tūpuna, identi	Oppose	Oppose in part requesting that farm quarries be excluded from the rule and permitted with appropriate setbacks from sensitive sites, so properties mostly covered by a SASM overlay can still meet operational needs. Considers existing quarries should remain permitted, and the rule could be supported if the overlay mapping is rationalised as submitted.	Seeks to amend as follows: New mining activities, farm quarries or quarrying activities within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significance to Māori Activity status:~~Discretionary~~ Permitted Where: PER-1 The farm quarry is set back 100m from tuhituhi nehera, waterways, limestone escarpments, archaeological sites and cemeteries or urupa. ~~DIS-1~~PER-2 Gravel extraction is required for flood mitigation works. undertaken by a regional council. Notification: Any application made under NC-1 ~~this rule~~ may be notified to Te Rūnanga o Moeraki.
298.104	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-R12 Cemeteries or crematoria within a wāhi tūpuna, identified in SCHED5 - Sites and Areas	Support	No specific reason given.	Seeks to retain as notified.
298.105	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-R13 Landfills within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significanc	Support	No specific reason given.	Seeks to retain as notified.
298.106	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-R14 Wastewater treatment plants within a wāhi tūpuna, identified in SCHED5 - Sites and Ar	Support	No specific reason given.	Seeks to retain as notified.
298.107	Alastair and Carrie Gibson	Sites and Areas of Significance to Maori	SASM-R15 Planting wilding conifer species within a wāhi tūpuna, identified in SCHED5 - Sites a	Support	No specific reason given.	Seeks to retain as notified.
298.108	Alastair and Carrie Gibson	Earthworks	General	Oppose	Oppose in part noting that small-scale, occasional earthworks are essential for primary production, land management, and health and safety, and are critical to the economic and sustainable management of land and water resources.	No specific relief sought.
298.109	Alastair and Carrie Gibson	Earthworks	EW-O1 Earthworks activities Earthworks activities enable people and communities, social	Support	No specific reason given.	Seeks to retain as notified.

298.110	Alastair and Carrie Gibson	Earthworks	EW-O3 Protecting communities Earthwork activities are undertaken in a manner that maint	Support	No specific reason given.	Seeks to retain as notified.
298.111	Alastair and Carrie Gibson	Earthworks	EW-O2 Protecting sensitive environments Indigenous biodiversity, natural landscapes, natur	Support	Support with modification to clarify and narrow scope by defining "natural landforms," referencing "Significant Natural Areas" for indigenous biodiversity, and aligning references to "natural landscapes" and "natural features" with Outstanding Natural Landscapes and Features, while ensuring existing earthworks in sensitive environments can continue. Considers the objective should also reference 'Historic and Cultural Values' for clarity and efficiency, and protect long-standing activities like the Oamaru Stone Quarry within sensitive environments.	Seeks to amend as follows: ~~Indigenous biodiversity~~ Significant Natural Areas, Outstanding natural landscapes, ~~natural landforms,~~ Outstanding natural features, ~~mana whenua~~ and historic and cultural ~~heritage~~ values are protected from the adverse effects of new earthworks.
298.112	Alastair and Carrie Gibson	Earthworks	EW-P1 Enabling earthworks Enable earthworks where the scale, extent and effects are approp	Support	No specific reason given.	Seeks to retain as notified.
298.113	Alastair and Carrie Gibson	Earthworks	EW-P2 Protecting sensitive environments Provide for earthworks where adverse effects on th	Support	No specific reason given.	Seeks to retain as notified.
298.114	Alastair and Carrie Gibson	Earthworks	EW-P3 Conservation activities within sensitive environments Enable earthworks that facilit	Support	No specific reason given.	Seeks to retain as notified.
298.115	Alastair and Carrie Gibson	Earthworks	EW-P4 Primary production activities Enable earthworks that support the operational effi	Support	Support with modification to allow earthworks for installing identified infrastructure and farm buildings, as considers these are managed by existing standards and provide positive environmental effects. Considers enabling primary production activities should be maximised outside sensitive environments, which are already protected by other plan provisions.	Seeks to amend as follows: Enable earthworks that support the operational efficiency of primary production activities, including the construction, maintenance and repair of existing farm tracks, farm buildings, yards, irrigation systems, fences, dams, stormwater infrastructure, sedimentation ponds, culverts and stormwater drains.
298.116	Alastair and Carrie Gibson	Earthworks	EW-P5 Construction and maintenance of farm tracks and recreational tracks Enable earthwork	Support	No specific reason given.	Seeks to retain as notified.
298.117	Alastair and Carrie Gibson	Earthworks	EW-P6 Earthworks within the National Grid Yard Enable earthworks within the National Grid	Support	No specific reason given.	Seeks to retain as notified.
298.118	Alastair and Carrie Gibson	Earthworks	EW-P7 The effects of earthworks Manage any earthworks to avoid, remedy or mitigate adve	Support	Support with modification to clarify that effects should be controlled beyond the site boundary and that visual amenity and local amenity values should only apply off-site and in sensitive environments, while removing soil quality as it is a regional council matter.	Seeks to amend as follows: Manage any earthworks to avoid, remedy or mitigate adverse effects on the following: 1. the stability of land, buildings and structures at or beyond the boundary of the site; and

						2. the visual amenity values of the site in a sensitive environment, and after rehabilitation; and ~~3. natural landforms; and~~ 4. local amenity values beyond the boundary of the site; and 5. erosion and sediment loss from the site; and ~~6. natural hazard risk; and~~ 7. the stormwater management systems; and 8. dust, lighting, odour, vibration, noise and traffic beyond the boundaries of the site; and ~~9. soil quality.~~
298.119	Alastair and Carrie Gibson	Earthworks	EW-P8 Rehabilitation of disturbed ground Enable earthworks that enhance, restore or rehabi	Support	Support with modification that restoration should not always reflect the surrounding landform and vegetation, but enhancement or rehabilitation may require different approaches such as replacing undesirable species with more suitable ones. Considers the policy should enable positive changes rather than require strict replication of existing conditions.	Seeks to amend as follows: Enable earthworks that enhance, restore or rehabilitate areas of disturbed ground ~~to reflect the surrounding landform and vegetation.~~
298.120	Alastair and Carrie Gibson	Earthworks	EW-R1 General earthworks located outside of a sensitive environment All zones Activit	Support	Support with modified standards as detailed below [refer to original submission].	Seeks to retain as notified but with amended standards [refer to original submission]
298.121	Alastair and Carrie Gibson	Earthworks	EW-R2 Earthworks for repair and maintenance activities within or outside of a sensitive enviro	Support	Support with the addition of construction of infrastructure and farm buildings, so that earthworks for house builds or small sheds are permitted without unnecessary extra consent, while large-scale construction remains controlled by existing thresholds.	Seeks to amend as follows: Earthworks for construction, repair and maintenance activities within or outside of a sensitive environment PER-1 ... 10. farm buildings; and PER-3 Earthworks undertaken for the lawful establishment of: 1. farm tracks; 2. yards; 3. water supply and irrigation systems; 4. fences; 5. dams/ponds; 6. walking and cycling tracks; 7. driveways and accessways; 8. stormwater infrastructure, sediment detention ponds, culverts and stormwater drains; 9. coastal hard protection structures;
298.122	Alastair and Carrie Gibson	Earthworks	EW-R3 Earthworks for the construction of farm tracks,	Support	Support with amendment to allow wider dairy tracks (at least 6.5–8m) and accommodate larger machinery, as recommended by DairyNZ and typical for the Waitaki District.	Seeks to amend as follows:

			public footpaths, public bridle paths an			Where: PER-1 The track is associated with a permitted or lawfully established activity within the zone and does not exceed ~~4~~ 8metres in width with an additional allowance of 1 metre either side of the track for battering; and
298.123	Alastair and Carrie Gibson	Earthworks	EW-R4 Earthworks for conservation activities within a sensitive environment All zones	Support	Support with a higher threshold, as considers requiring consent for conservation earthworks in sensitive environments could discourage important activities like fencing SNAs or planting indigenous species.	Seeks to either permit the relevant earthworks thresholds for the underlying zone or increase the threshold within all conservation activities rules. Seeks to amend as follows: Earthworks for conservation activities within a riparian margin or sensitive environment Activity status: Permitted Where: PER-1 ~~On any site earthworks do not exceed 25m2 in area over any 3 year period.~~ ~~PER-2~~ All of the following standards are complied with: 1. EW-S2 Maximum cut depth and fill height; 2. EW-S3 Earthworks on sloping sites; and ~~3. EW-S4 Earthworks within 20m of a waterbody.~~ Activity status when compliance is not achieved: Restricted Discretionary Where: RDIS-1 Compliance is not achieved with ~~PER-2~~ PER-1 Matters of discretion are restricted to: 1. the matters of discretion listed in any of the standards EW-S2, EW-S3 and/or EW-S4 that are not complied with. ~~Activity status when compliance is not achieved: Discretionary~~ ~~Where:~~ ~~DIS-1~~ ~~Compliance is not achieved with PER-1~~
298.124	Alastair and Carrie Gibson	Earthworks	EW-R5 Earthworks within a riparian margin All zones Activity status: Permitted Wher	Support	Support with modifications to clarify the distinction between regional and district council responsibilities, remove duplication in matters of discretion, permit maintenance of water supply systems, and limit consideration of cumulative effects to those specifically identified.	Seeks to amend as follows: PER-3

						... c. water supply or irrigation systems; Matters of discretion are restricted to: ... 2. the extent and management of adverse effects or cumulative effects on natural character of the riparian margin, including: a. the extent to which the proposed earthworks will: i. allow natural elements to dominate; and ~~ii. introduce man-made elements to the riparian margin; and~~ iii. affect the amenity values of the riparian margin; and iv. create disturbances that will be ... ~~ix. restrict access for mahika kai purposes; and~~ ~~3. any cumulative effects.~~
298.125	Alastair and Carrie Gibson	Earthworks	EW-R6 Earthworks and land disturbance within the National Grid Yard All zones Activit	Support	No specific reason given.	Seeks to retain as notified.
298.126	Alastair and Carrie Gibson	Earthworks	EW-R7 Earthworks within a sensitive environment All zones Activity status: Discretion	Support	No specific reason given.	Seeks to retain as notified.
298.127	Alastair and Carrie Gibson	Earthworks	EW-S1 Threshold areas (m2) All Residential Zones Rural Lifestyle Zone Settlement Zo	Oppose	Considers that area thresholds are an inadequate tool for managing earthworks as they focus on the size of the activity rather than its environmental impact and effect management should take precedence over area measurement. Considers that thresholds should be used as matters of discretion or permitted activity criteria, not rigid limits and that the current thresholds are too low, capturing routine activities like house scrapes, silage pits, and shed construction. Also considers that the standards duplicate those in the NFL chapter, regarding landscape effects, which are subjective and undefined outside NFL overlays.	Seeks to remove area thresholds so they default to regional council thresholds and introduce standards or permitted activity criteria to manage the effects of earthworks directly. If threshold areas are to remain seeks to increase threshold to 1,000m2 for all zones. Seeks to amend as follows: Matters of discretion are restricted to: 1. whether ~~the~~ earthworks changing the landform of a ridgeline are of a type, scale and form that is appropriate for the location and anticipated character of the zone; and 2. the management of silt, sediment and erosion on-site; and 3. impacts on ~~character and~~ amenity values beyond the site boundary, ~~natural landforms and features~~, including whether the cut face and/or any retaining structures can be concealed behind

						development or effectively landscaped; and 4.~~visual amenity, including~~ landscape treatment, site reinstatement and screening; and ~~5. the potential for cumulative effects on the natural form of the landscape; and~~ ... ~~Note: A landscape assessment may be required for the assessment of this standard.~~ ...
298.128	Alastair and Carrie Gibson	Earthworks	EW-S2 Maximum cut depth and fill height The cut depth or fill height must not exceed 1	Support	Support for EW-S2 with modification to reduce the number of consents that will be required across the district.	Seeks to amend as follows: 1. The cut depth or fill height must not exceed ~~1.53~~metres as measured vertically; and 2. Cut or fill supported by a retaining wall must be setback a distance at least equal to the height of the retaining wall. 3. Cut and fill equal to or less than 0.5m in height is exempt from this standard. 4. Cut and fill for building platforms is exempt from this standard. 5. Earthworks over 1.5m in height or depth that take place within 1.5m of a site boundary require a written approval from the adjoining landowner. ~~Note: Earthworks over 1.5m in height or depth that take place within 1.5m of a site boundary may require a written approval from the adjoining landowner.~~
298.129	Alastair and Carrie Gibson	Earthworks	EW-S3 Earthworks on sloping sites Earthworks must not take place on slopes with an ang	Support	No specific reason given	Retain as notified
298.130	Alastair and Carrie Gibson	Earthworks	EW-S4 Earthworks within 20 metres of a waterbody Earthworks shall not take place withi	Support	Support with modification to reduce consent costs and improve clarity around when ecological or landscape reports are required.	Seeks to amend as follows: Matters of discretion are restricted to: 1. the provision of sediment control techniques to ensure sediment run-off does not enter a waterbody; and 2. effects of earthworks within 5m of the waterbody on the natural character and ecological values of the waterbody; and ~~3. impacts on the character and amenity values, natural landforms and features; and~~ ~~4. management of visual amenity effects through~~ landscape treatment, site reinstatement and screening; and ~~5. the potential for cumulative effects on the natural form of the landscape.~~

						Note: A site management plan may be required for consideration of the assessment matter 1. Note: An ecological report ~~and/or landscape assessment~~ may be required for consideration of matters of discretion (2),~~(3), (4) and (5)~~ in EW-S4.
298.131	Alastair and Carrie Gibson	Earthworks	General	Support	Support the rules, objectives and policies overall especially EW(Q)-P1 for farm quarries, as enabling on-farm aggregate use benefits the environment by reducing road wear and transport emissions.	Seeks to retain as notified.
298.132	Alastair and Carrie Gibson	Earthworks	EW(Q)-P4 Existing quarries Enable the continued operation of existing lawfully established	Support	Support the protection of existing quarries beyond existing use rights, as considers it is critical to avoid excessive consent barriers that could threaten their continued operation, similar to the challenges faced by landfills.	Seeks to retain as notified.
298.133	Alastair and Carrie Gibson	Earthworks	EW(Q)-R1 Farm quarry General Rural Zone Special Purpose Zone - Macraes Mining Activ	Support	Support with modification, as considers the current restriction on quarrying in sensitive environments is too broad and prevents the benefits of farm quarrying across much of the district. Considers the rule should be proportionate to the scale limits already in place and earthworks in sensitive environments are managed by other chapters.	Seeks to amend as follows: PER-6 The farm quarry is not located within ~~a sensitive environment or within~~ the Coastal Environment or Coastal Natural Hazard overlays.
298.134	Alastair and Carrie Gibson	Earthworks	EW(Q)-R3 Restricted use quarry General Rural Zone Special Purpose Zone – Macraes Mini	Support	Support with modification for consistency, as the current daily extraction limit of 100m3 is inconsistent with the allowed number of heavy vehicle trips in (CON-4).	Seeks to amend as follows: CON-3 The quantity of aggregate extracted is limited to ~~100m^3~~ 200m^3 day; and
298.135	Alastair and Carrie Gibson	Earthworks	General	Support	General support but considers that quarrying activities currently captured by the mining definition should instead be managed under quarrying provisions to ensure protection for existing quarries.	Seeks to retain as notified but with changes to mineral definition as submitted [refer to submission #298.19].
298.136	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	General	Oppose	Oppose the chapter in part - considers proceeding with identifying new SNAs before the government's review and changes to the NPS-IB will create unnecessary and repeated requirements for landowners and the community, especially given the current suspension of council obligations to identify new SNAs until October 2027.	Seeks to retain the existing policy and rule framework for managing indigenous biodiversity in the ODP and implement only the requirements of the NPS-IB where SNAs have already been identified by the current/operative district plan. Seeks to defer the wider chapter review until there is more certainty from government and until such time that the review of the NPS-IB has occurred.
298.137	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-O1 Halt the decline of indigenous biodiversity Halt the decline of the Waitaki Dist	Oppose	Oppose in part, supporting the management of indigenous biodiversity in line with national direction, but seek amendment to focus maintenance and enhancement efforts on significant habitats and fauna, rather than requiring resource-intensive calculations across all zones. Considers the objective should prioritize consistency with national policy and target significant areas for enhancement where appropriate.	Seeks to amend as follows: ~~Halt the decline~~ Manage of the Waitaki District's indigenous biodiversity ~~so there is at least no overall loss, including between species and ecosystems,~~by maintaining and, where appropriate, enhancing indigenous biodiversity, in areas of mapped significant indigenous habitats and significant fauna (Significant Natural

						Areas) ~~and to achieve this~~ by: 1. protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity while providing for the social, cultural and economic wellbeing of people and communities now and in the future; and 2. recognising the mana of takata whenua ~~as~~ to exercise kaitiaki ~~of~~ in relation to maintaining, enhancing and restoring indigenous biodiversity; and 3. recognising people and communities, including landowners, as guardians of indigenous biodiversity.
298.138	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-O2 Identify and protect Significant Natural Areas Areas identified as Significant Natu	Oppose	Oppose in part, seeking modification for clarity and consistency with ECO-O1, and to ensure the objective focuses on the purpose of identifying SNAs, involves transparent partnership with landowners, and does not discourage new indigenous plantings. Considers SNAs should only be identified where indigenous biodiversity already exists as of March 1, 2025 and the process should recognise the role of sustainable land uses in maintaining significant values and avoid duplicating efforts or undermining trust with landowners.	Seeks to amend as follows: ECO-O2 Identify ~~and protect~~ Significant Natural Areas ~~Areas identified as Significant Natural Areas are protected to ensure no net loss of indigenous biodiversity or indigenous biodiversity values as a result of land use activities.~~ Work with people and communities, including mana whenua and land owners, to identify Significant Natural Areas of indigenous biodiversity established in accordance with the NPS-IB.
298.139	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-O3 Restore or enhance Significant Natural Areas Significant Natural Areas are resto	Support	Support in part, agreeing that restoration and enhancement should be encouraged where appropriate, but also emphasising the need to allow appropriate development where area values can be maintained, as many existing land management practices have already supported significant indigenous habitats and fauna.	Seeks to amend as follows: Existing mapped Significant Natural Areas are restored or enhanced, where appropriate and provision is made for the appropriate subdivision, use and development where the values of the area can be maintained.
298.140	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-P1 Evaluation of Significant Natural Areas Identify the ecological significance of	Oppose	Considers ECO-P1 should be deferred until the government review of the NPS-IB is complete.	Seeks for the deletion of ECO-P1 [refer to original submission for full relief sought] If ECO-P1 is not deleted, seeks to amend as follows: Work with mana whenua and land owners to identify the ecological significance of indigenous vegetation and habitats of indigenous fauna established before 1st March 2025 using; ~~1. the criteria contained in APP5 – Criteria for identifying areas that qualify as Significant Natural Areas (SNA); or~~ 1. The criteria in the NPS IB; or 2. in the case of Crown owned land, Clause 3.8(8) of the National Policy Statement on Indigenous Biodiversity and: ~~3. where they are known and meet the criteria to be SNA's, list them in SCHED6 Significant Natural Areas and on the Planning Maps;~~ ~~3. where they are not known,~~ applying the criteria through the resource consent process, notice of requirement, outline plan, or other planning processes, to determine an area's significance; and 4. if a new Significant Natural Area is identified as a result of a resource consent application, include the SNA in SCHED6 –

						Significant Natural Areas in the next appropriate plan review or plan change notified by Waitaki District Council.
298.141	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-P2 Protection of Significant Natural Areas Except as provided for in clause 2 belo	Support	Support in part, with modification to split into simpler policies for clarity and ensuring sustainable land uses can continue alongside SNAs where effects are managed so landowners can maintain pest control and reinvestment in significant natural areas.	Seeks to amend as follows: 1. Except as provided for in clause 2 below, protect Significant Natural Areas listed in SCHED6 – Significant Natural Areas by: a. ensuring the following adverse effects are avoided, remedied or mitigated on the: i. loss of ecosystem representation and extent; .... 2.~~The~~ Manage any adverse effects of subdivision, use and development on identified SNA's ~~shall be managed~~ in accordance with 1.b. above only, in relation to the following activities: a. the new subdivision, use or development is required for the purposes of any of the following: i. construction or upgrade ~~(if the upgrade does not meet the requirements of clause 3.15(2) of the National Policy Statement on Indigenous Biodiversity)~~ of specified infrastructure that provides significant national or regional public benefit: or ... v. there is a functional need or operational need for the new subdivision, use or development to be in that particular location~~;~~ and ~~vi.~~there are no practicable alternative locations for the new subdivision, use or development;
298.142	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-P3 Appropriate activities within Significant Natural Areas Enable limited - earthw	Support	Support in part - [No specific reason given]	Seeks to amend as follows: Enable limited - ... 3. Is for a lawfully established activity; or 4. The activity as a functional need to be located in the area; or 5. The activity has no more than minor adverse effects on the significant indigenous vegetation of fauna or habitat.
298.143	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-P4 Supporting the maintenance, restoration and enhancement of indigenous biodiversity	Support	Support in part, seeking amendments to recognise that different areas may require different management approaches, that primary production can benefit indigenous biodiversity, and that eco-sourced planting should only be required where justified. Also notes that integrated management across administrative boundaries can only be encouraged, not enforced.	Seeks to amend as follows: ... 3. encouraging,~~or where appropriate requiring~~, the use of eco-sourced indigenous plantings where it is available; 4.~~ensuring it is managed~~ encourage management in an integrated way, within, and across administrative boundaries; 5. giving effect to the decision-making principles set out in Clause

						1.5 of the National Policy Statement on Indigenous Biodiversity; 6. recognising that maintaining indigenous biodiversity~~requires~~ can be achieved by: a. the maintenance and ~~at least~~ no overall reduction of ~~all~~ the following: ... 7. promoting increased indigenous vegetation cover in both urban environments and non-urban environments where appropriate; 8. requiring that significant adverse effects of activities on indigenous biodiversity (outside of SNA's or on specified Māori land) are managed by applying appropriate thresholds for indigenous vegetation clearance which was established after 1st March 2025, and where these are not met, by applying the biodiversity effects management hierarchy. 9. Recognising the benefits of farm management practices and active management of indigenous biodiversity including voluntary animal and plant pest and stock control and/or formal legal protection.
298.144	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-P5 National priorities for protection Recognise the following national priorities f	Support	No specific reason given.	Seeks to retain as notified.
298.145	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-P6 Impacts of climate change on resilience of ecosystems Take into account the potenti	Support	Support in principle, but suggests modifications to align with the NPS-IB by focusing on considering specific, known effects of climate change rather than speculative future impacts.	Seeks to amend as follows: ~~Take into account the potential future impacts~~ Consider the effectsof climate change to promote resilience of indigenous biodiversity to climate change: ...
298.146	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-P7 Providing for the relationship of takata whenua with indigenous biodiversity Pro	Support	No specific reason given.	Seeks to retain as notified.
298.147	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-P8 Indigenous vegetation on urban environment allotments Recognise that indigenous	Support	Support with a modification to include ‘domestic curtilage’ as defined in the plan, to ensure properties with septic tanks that don’t meet the ‘urban environment allotment’ definition aren’t unnecessarily subject to the ECO chapter’s stricter requirements.	Seeks to amend as follows: Indigenous vegetation on domestic curtilage ~~urban environment allotments~~ Recognise that indigenous vegetation on domestic curtilage ~~urban environment allotments~~ is not protected, unless specifically scheduled in the plan as a Significant Natural Area or Notable Tree.

298.148	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-P9 Precautionary approach Adopt a precautionary approach to considering the adverse	Support	No specific reason given	Seeks to retain as notified.
298.149	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-P10 Provision for maintenance of improved pasture for primary production where it may affe	Support	Support with modifications to improve clarity by removing the subjective requirement for 'adequate evidence' of regular pasture maintenance, as the definition of pasture already implies this. Also consider that the clause excluding improved pasture that has become an SNA is unnecessary and circular, since such areas are already protected under SNA provisions.	Seeks to amend as follows: Allow for the maintenance of improved pasture to continue where: 1.~~there is adequate evidence to demonstrate that~~ the maintenance of improved pasture is part of a regular cycle of periodic maintenance of that pasture; 2. any adverse effects of the maintenance of improved pasture on an identified SNA are no greater in intensity, scale, or character than the effects of activities previously undertaken as part of the regular cycle of periodic maintenance of that pasture; ~~3. the improved pasture has not, itself, become an SNA;~~ ~~4. the land is not an uncultivated depositional landform; and~~ 5. the maintenance of improved pasture will not adversely affect a threatened or at risk (declining) species.
298.150	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-P11 Highly mobile fauna In relation to habitats of highly mobile fauna: identify a	Oppose	Considers the policy should be deferred until the NPS-IB review is complete.	Seeks to delete ECO-P11. If retained, seeks modification to make it consistent with the NPS IB and prevent duplication between territorial authority and regional council [refer to original submission for full relief sought] Seeks to amend as follows: In relation to habitats of highly mobile fauna: 1.Assist the regional council to identify and manage areas outside of SNA's that support specified highly mobile fauna to maintain their populations across their natural range, and improve information and awareness around them; and 2. manage the adverse effects of activities on them, in order to maintain viable populations of specified highly mobile fauna across their natural range.
298.151	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-P12 Restoration of indigenous biodiversity In relation to restoration of indigenous	Support	No specific reason given.	Seeks to retain as notified.
298.152	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-P13 Commercial forestry In relation to commercial forestry: the adverse effects of	Support	Support in part with appropriate management of commercial forestry within existing mapped SNA areas.	Seeks to amend as follows: In relation to commercial forestry: 1. the adverse effects of commercial forestry activities in any existing commercial forest on any identified SNA must be managed in a manner that: a. maintains indigenous biodiversity in the identified SNA as far as practicable; while b. providing for commercial forestry activities to continue; and 2. despite ECO-P2, any part of an identified SNA that is within an area of an existing commercial forest that is planted, or is

						intended to be, replanted in trees for harvest must be managed over the course of consecutive rotations of production in the manner necessary to maintain the long-term populations of any threatened or at risk (declining) species present in the area.
298.153	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-P14 Managing indigenous vegetation outside Significant Natural Areas Avoid signific	Oppose	Considers the policy is overly broad and imposes disproportionate cost and complexity across the district, despite the NPS-IB not requiring territorial authorities to avoid significant adverse effects on indigenous vegetation outside SNAs.	Seeks to delete the provision.
298.154	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-P15 Inappropriate activities within or near to Significant Natural Areas Prohibit t	Support	Support with modification to specify that only deliberate planting is included.	Seeks to amend as follows: Prohibit the deliberate planting of: ...
298.155	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-R1 Indigenous vegetation clearance outside of a Significant Natural Area listed in SCHED6	Support	Support, in particular the provision permitting indigenous vegetation clearance for existing established activities, provided appropriate thresholds or circumstances are met.	Seeks to retain as notified.
298.156	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-R2 Indigenous vegetation clearance within a Significant Natural Area listed in SCHED6 – Si	Support	Support in part, endorsing clearance of indigenous vegetation where there is a functional need within listed SNAs, but suggesting that minor breaches of permitted activity standards may not always warrant an ecological assessment and this should be reflected in the note.	Seeks to amend note as follows: Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any application made under this provision ~~must provide~~ will likely require, in addition to the standard information requirements, an Ecological Assessment, provided by a suitably qualified ecologist, that is commensurate with the scale and significance of the proposal, and meets the requirements of APP8 - ECO Chapter Information Requirements for Resource Consents.'
298.157	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-R3 Earthworks within a Significant Natural Area listed in SCHED6 – Significant Natural Are	Support	Support with modifications to improve practicality by allowing earthworks within mapped SNAs where there is a functional need, and reconsidering the 10 working days' notice requirement, which may not be feasible in cases like emergencies or weather delays. Additionally, minor earthworks exceeding permitted standards may not always justify an ecological assessment, and the note should reflect this flexibility.	Seeks to amend as follows: PER-3 Silt and sediment control measures are in place to prevent discharge of silt and/or sediment into the Significant Natural Area ~~and notice is provided to Council 10 working days prior to the commencement of works.~~ Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any application made under this provision ~~must provide~~ will likely require, in addition to the standard information requirements, an Ecological Assessment, provided by a suitably qualified ecologist, that is commensurate with the scale and significance of the proposal, and meets the requirements of APP8 - ECO Chapter Information Requirements for Resource Consents.
298.158	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-R4 Exotic commercial forestry, agricultural intensification, quarrying activity or mining	Support	No specific reason given.	Seeks to retain as notified with Matters of Discretion in the correct column.

298.159	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-R5 Commercial forestry, agricultural intensification, quarrying activity or mining activit	Support	No specific reason given.	Seeks to retain as notified.
298.160	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-R6 Planting non-indigenous vegetation within a Significant Natural Area listed in SCHED6 –	Support	Support in part, noting that a blanket prohibition on planting non-indigenous vegetation within SNAs could significantly impact existing primary production, and suggesting that such activities should be considered through a resource consent process where adverse effects can be appropriately managed.	Seeks to amend as follows: ~~Planting~~ Deliberate planting of new non-indigenous vegetation within a Significant Natural Area listed in SCHED6 – Significant Natural Areas Activity status:~~Prohibited~~ Discretionary
298.161	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-R7 Planting species that result in wilding conifers within a Significant Natural Area, or	Oppose	Oppose in part - should be clarified that only deliberate planting is controlled by ECO-R6 and ECO-R7.	Seeks to amend as follows: ~~Planting~~ Deliberate plantingof species that result in wilding conifers within a Significant Natural Area, or within 100m of a Significant Natural Area listed in SCHED6 – Significant Natural Areas
298.162	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-S1 Indigenous vegetation clearance in highly sensitive ecological environments that are no	Oppose	Oppose ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification, and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators.	[Refer to original submission for full relief sought] Seeks to amend as follows: Indigenous vegetation clearance in highly sensitive ecological environments that meet SNA criteria but are not currently identified as Significant Natural Areas
298.163	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-S2 Indigenous vegetation clearance in sensitive ecological environments that are not curre	Oppose	Oppose ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification, and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators.	[Refer to original submission for full relief sought] Seeks to amend as follows: Indigenous vegetation clearance in highly sensitive ecological environments that meet SNA criteria but are not currently identified as Significant Natural Areas
298.164	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-S3 Indigenous vegetation clearance in threatened land environments Indigenous veget	Oppose	Oppose ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification, and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators.	[Refer to original submission for full relief sought] Seeks to amend as follows: Indigenous vegetation clearance in highly sensitive ecological environments that meet SNA criteria but are not currently identified as Significant Natural Areas
298.165	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-S4 Indigenous vegetation clearance areas dominated by snow tussock Indigenous vegetati	Oppose	Oppose ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification, and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'ephemeral wetlands', making compliance impractical. Considers the plan should instead use clearly defined and	[Refer to original submission for full relief sought] Seeks to amend as follows:

					mapped terms such as 'wetlands' to ensure clarity and usability for operators.	Indigenous vegetation clearance in highly sensitive ecological environments that meet SNA criteria but are not currently identified as Significant Natural Areas
298.166	Alastair and Carrie Gibson	Ecosystems and Indigenous Biodiversity	ECO-S5 General indigenous vegetation clearance If not addressed by ECO-S1 to ECO-S4, th	Support	Support ECO-S5 with amendments to ECO-S1 to ECO-S4.	Seeks to retain as notified.
298.167	Alastair and Carrie Gibson	Natural Character	General	Support	General support for the chapter with modification to riparian margin definition.	Seeks to retain as notified with amendment to riparian margin definition [refer to submission #298.16]
298.168	Alastair and Carrie Gibson	Natural Features and Landscapes	General	Support	Support in part but considers the stringent provisions applied to NFL overlays are disproportionate to the land types and the scale of coverage.	Seeks to adjust the overlays so that stringent rules apply only to landscapes that are agreed with landowners as significant or outstanding.
298.169	Alastair and Carrie Gibson	SCHED7 – Schedule of Outstanding Natural Features	ONF25 Outstanding Natural Feature Earthquakes Feature description Limestone hi	Oppose	Considers the mapped overlay areas for ONF25 are too broad, and the stringent rules applied to them are disproportionate to the actual landscape characteristics. Considers that reliance on existing use rights is problematic, especially for activities like agricultural intensification, which can lose protection if paused for a year and the plan creates a risk of locking in current land uses, as stopping an activity could trigger a new consent requirement to restart it. Also considers that remote desktop mapping is inadequate and that ground-truthing with landowners has proven more effective and led to better agreement on overlay extents. [refer to original submission for full reasons]	Seeks to amend the boundaries for ONF25 as per map provided in original submission [refer to original submission for relief sought].
298.170	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-O1 Outstanding Natural Features and Landscapes Outstanding Natural Features and Landsc	Support	No specific reason given	Seeks to retain as notified
298.171	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-O2 Significant Natural Features and Rural Scenic Landscapes The values of Significant	Support	Supports in part the objective to protect Significant Natural Features and Rural Scenic Landscapes, but suggests values should be maintained only where appropriate.	Seeks to amend as follows: The values of Significant Natural Features and Rural Scenic Landscapes are maintained where appropriate.
298.172	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-O3 Wilding conifers The impact of wilding conifers on Outstanding Natural Features and	Support	Supports in part the objective to reduce the impact of wilding conifers on landscape areas, and suggests the policy should encourage reduction of these effects.	Seeks to amend as follows: Encourage the impact of wilding conifers on Outstanding Natural Features and Landscapes, Significant Natural Features, and Rural Scenic Landscapes is be reduced.
298.173	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-O4 Restoration and enhancement of landscapes Outstanding Natural Features and Landscap	Oppose	Opposes the objective as currently worded, arguing that it could result in subjective assessments and requiring restoration and enhancement of landscape values may not always be practicable and suggests limiting the requirement to where practicable.	Seeks to delete NFL-O4 but seeks to amend as follows if retained: Where practicable, Outstanding Natural Features and Landscapes, Significant Natural Features, and Rural Scenic Landscapes are restored and enhanced, where their values listed in this plan have been lost or degraded.
298.174	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-P1 Identification of Outstanding Natural Features	Support	Supports in part the policy for identifying ONL/ONF, but recommends using the full Pigeon Bay criteria as current wording	Seeks to delete NFL-P1. If retained, seeks to include all Pigeon Bay criteria and an

			and Landscapes In relation to the		omits some of the criteria and could be misleading. Also considers the policy implies changes could occur outside of the plan change or review process.	additional requirement to work onsite in consultation with the land owner. Seeks also to include a note that changes will only occur through normal plan change or plan review.
298.175	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-P2 Identification of Significant Natural Features and Rural Scenic Landscapes In re	Support	Supports in part the policy for identifying SNF/RSL, but recommends using the full Pigeon Bay criteria as current wording omits some of the criteria and could be misleading. Also considers the policy implies changes could occur outside of the plan change or review process.	Seeks to delete NFL-P2 If retained, seeks to include all Pigeon Bay criteria and an additional requirement to work onsite in consultation with the land owner. Seeks also to include a note that changes will only occur through normal plan change or plan review.
298.176	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-P3 Recognise the importance of protecting natural features and landscapes Recognise:	Support	No specific reason given.	Seeks to retain as notified.
298.177	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-P4 Avoiding inappropriate activities on or within Outstanding Natural Features or Landscap	Support	Supports in part the policy to avoid inappropriate activities on Outstanding Natural Features and Landscapes, but considers there is ambiguity in the wording and seeks clearer discouragement of critical infrastructure in these areas and more precise identification of values.	Seeks to amend as follows: Only provide for subdivision, use and development where it: 1. protects the values identified in SCHED7 – Outstanding Natural Features and SCHED8 – Outstanding Natural Landscapes that make the natural feature or landscape outstanding; and ~~2. avoids, remedies or mitigates adverse effects on other Outstanding Natural Features and Landscapes values, including avoiding any significant loss of indigenous vegetation.~~ 2. avoids the placement of critical infrastructure within the Outstanding Natural Features and Landscapes unless there is no reasonable alternative due to the functional need for the location and the adverse effects on landscape values can be avoided or appropriately managed.
298.178	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-P5 Avoiding inappropriate activities on or within Significant Natural Features and Rural S	Support	Supports the policy for Rural Scenic Landscapes and Significant Natural Features, but requests clarification that only identified values are protected, to avoid ambiguity.	Seeks to amend as follows: Only provide for subdivision, use and development in Rural Scenic Landscapes and on Significant Natural Features where it: 1. maintains ~~amenity values; and~~ the values identified in SCHED9 - Significant Natural Features and SCHED10 - Schedule of Rural Scenic Landscapes. ~~2. avoids, remedies or mitigates adverse effects on other values of Significant Natural Features or Rural Scenic Landscapes, including avoiding any significant loss of indigenous vegetation.~~
298.179	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-P6 Landscape's ability to absorb change When determining a landscape's ability to abso	Support	Supports the policy but only if other landscape overlays are corrected as requested for ONF029 [ONF025 - refer to submission point 298.169].	Seeks to conditionally retain as notified.
298.180	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-P7 Earthworks within identified natural features and landscapes When determining if ea	Support	Supports the policy but only if other landscape overlays are corrected as requested for ONF029 [ONF025 - refer to submission point 298.169].	Seeks to conditionally retain as notified.

298.181	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-P8 Buildings and structures on or within identified natural features and landscapes Wh	Support	Supports the policy but only if other landscape overlays are corrected as requested for ONF029 [ONF025 - refer to submission point 298.169].	Seeks to conditionally retain as notified.
298.182	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-P9 Subdivision on or within identified natural features and landscapes Avoid subdivisi	Support	Supports the policy but only if other landscape overlays are corrected as requested for ONF029 [ONF025 - refer to submission point 298.169].	Seeks to conditionally retain as notified.
298.183	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-P10 Wilding conifers Avoid the spread of wilding conifers by: prohibiting planting of	Support	Supports the policy, but notes there is no incentive for landowners to remove wilding conifers and questions the effectiveness without council support.	Seeks to retain as notified but consider deleting clause (2) if there is no intention of following through.
298.184	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-P11 Enhancement and restoration of Outstanding Natural Features and Landscapes, Significan	Support	Supports in part the policy to enhance and restore landscape areas, but suggests restoration should only occur where appropriate.	Seeks to amend as follows: Support the enhancement and <u>where appropriate the</u> restoration of Waitaki's Outstanding Natural Features and Landscapes, Significant Natural Features and Rural Scenic Landscapes where their values have been lost or degraded by: ...
298.185	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-R1 Buildings and structures (excluding fences) on or within Outstanding Natural Features o	Oppose	Opposes the rule as considers that small-scale farm buildings should be permitted as they are compatible with landscape management. Considers that if the ONF boundaries can be rationalised to only areas that are genuinely natural (not improved pasture) then NFL-R1 could be supported.	Seeks to amend as follows: Activity status: Permitted Where: PER-1 The structure is underground; <u>or</u> <u>PER-2</u> <u>The building or structure is for primary production purposes, excluding residential units; and</u> <u>PER-3</u> <u>The building or structure does not exceed 30m2; and</u> <u>PER-4</u> <u>The building or structure does not exceed 3m in height; and</u> <u>PER-5</u> <u>The building or structure complies with the following standard:</u> <u>1. NFL-S1</u>
298.186	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-R2 Buildings and structures (excluding fences) on or within Significant Natural Features o	Support	Supports in part but considers the rule should allow for minor buildings on Significant Natural Features as per the reflief sought in submission point 298.185 or the same thresholds as in RSL.	Seeks to amend as follows: Activity status: Permitted Where:

						PER-1 The structure is underground; or PER-2 The building or structure is in a Rural Scenic Landscape ~~(except where it is also located on a Significant Natural Feature);~~and ....
298.187	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-R3 Permanent fencing on or within Outstanding Natural Features or Landscapes, Significant	Support	Supports in part but considers deer fencing up to 2.5m high be permitted for pest management.	Seeks to amend as follows: PER-2 Any fence or gates are no more than 1.5m high (except any deer fence which can be up to ~~2m~~ 2.5m high).
298.188	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-R4 Earthworks on or within Outstanding Natural Features or Landscapes or Significant Natur	Support	Supports in part but only if improved pasture is removed from ONFL overlays, otherwise, GRUZ earthworks rules should apply. Considers that earthworks are often needed to install tracks to give access for conservation efforts.	Seeks to conditionally retain as notified.
298.189	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-R5 Primary production activities (excluding buildings, mining activities, quarrying activi	Support	Supports the policy with modifications to the definition of agricultural intensification and requests removal of improved pasture from overlays.	Seeks to amend the definition of agricultural intensification and remove improved pasture from ONFL's and SNF's.[refer to original submission for full relief sought]
298.190	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-R6 Amenity planting and shelterbelts on or within Outstanding Natural Features or Landscap	Support	Supports permitting amenity planting and shelterbelts in landscape areas, provided the mapping is accurate.	Seeks to retain as notified.
298.191	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-R7 Outdoor recreational activities (excluding buildings) on or within Outstanding Natural	Support	Supports the rule with modification to exclude not-for-profit and charities from the definition of commercial activities.	Seeks to amend the definition of commercial activities and seeks to add a permitted activity criteria specifically for temporary events, or an advice note advising that the Temporary Events chapter overrides NFL-R7.
298.192	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-R8 Landscape restoration activities on or within Outstanding Natural Features or Landscape	Support	No specific reason given.	Seeks to retain as notified.
298.193	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-R9 Flood protection structures and flood protection works on or within Outstanding Natural	Support	Supports with modification to allow all people, not just councils, to undertake flood protection works.	Seeks deletion of PER-1 If retained, seeks to add a note to advise that emergency works are permitted under the RMA.
298.194	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-R10 Plantation Forestry within or on Significant Natural Features or Rural Scenic Landscap	Support	No specific reason given.	Seeks to retain as notified.
298.195	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-R11 Mining activities and/or quarrying activities (excluding existing farm quarries) withi	Support	Supports with modifications to protect existing quarrying and mining activities. [refer to original submission]	Seeks to amend as follows:

						Mining activities and/or quarrying activities (excluding existing ~~farm quarries~~ quarrying activity) within or on Significant Natural Features or Rural Scenic Landscapes [refer to original submission for full relief sought]
298.196	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-R12 Mining activities and/or quarrying activities (excluding existing farm quarries) on or	Support	Supports with modifications to protect existing quarrying and mining activities. [refer to original submission]	Seeks to amend as follows: Mining activities and/or quarrying activities (excluding existing ~~farm quarries~~ quarrying activity) within or on Significant Natural Features or Rural Scenic Landscapes [refer to original submission for full relief sought]
298.197	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-R13 Intensive indoor primary production and intensive outdoor primary production within or	Oppose	Opposes in part and considers restricted discretionary status is more appropriate instead of non-complying as parts of the RSL may be appropriate, particularly where land is already irrigated and developed.	Seeks to amend NFL-R13 from non-complying activity status to restricted discretionary with the matters of discretion being the same as NFL-R10.
298.198	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-R14 Plantation Forestry on or within Outstanding Natural Features or Landscapes All	Support	No specific reason given.	Seeks to retain as notified.
298.199	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-R15 Planting species that can result in wilding conifers on or within Outstanding Natural	Support	No specific reason given.	Seeks to retain as notified.
298.200	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-R16 Intensive indoor primary production and intensive outdoor primary production on or wit	Support	No specific reason given.	Seeks to retain as notified.
298.201	Alastair and Carrie Gibson	Natural Features and Landscapes	NFL-S1 Standards for colours of buildings and structures in landscapes Buildings and st	Support	No specific reason given.	Seeks to retain as notified.
298.202	Alastair and Carrie Gibson	Public Access	PA-O1 Public and customary access Public and customary access is protected, maintained,	Support	No specific reason given.	Seeks to retain as notified.
298.203	Alastair and Carrie Gibson	Public Access	PA-O2 Provision of public access minimises adverse effects Public access to and along t	Support	No specific reason given.	Seeks to retain as notified.
298.204	Alastair and Carrie Gibson	Public Access	PA-P1 Activities that protect and maintain public and customary access Enable activitie	Support	No specific reason given.	Seeks to retain as notified.

298.205	Alastair and Carrie Gibson	Public Access	PA-P2 Mechanisms for improving public access Protect, maintain and enhance public acces	Oppose	Opposes in part the policy encouraging public access opportunities in land use applications but considers it is too ambiguous without rules and could pressure applicants and suggests limiting to esplanade reserves/strips where appropriate through a subdivision process.	Seeks to amend as follows: Protect, maintain and enhance public access by: ~~1. encouraging opportunities and mechanisms to maintain and enhance public access when a land use application provides an opportunity for access; and~~ ~~2.~~1. requiring the creation of esplanade reserves and esplanade strips where appropriate in accordance with the Subdivision Chapter, ~~with priority given~~ along the waterways listed in SCHED11 – Priority Areas for Public Access and Esplanade Strips, and lakes larger than 8 hectares.
298.206	Alastair and Carrie Gibson	Public Access	PA-P3 Consideration of adverse effects on public access When considering any applicatio	Support	Supports the policy but considers it should apply only to public land, not private land.	Seeks to amend as follows: When considering any application for resource consents, have regard to any adverse effects of the proposed activity on public access routes and access points on public land.
298.207	Alastair and Carrie Gibson	Activities on the Surface of Water	General	Support	General support for the chapter.	Seeks to retain as notified - except for submission points that follow.
298.208	Alastair and Carrie Gibson	Activities on the Surface of Water	ASW-P2 Commercial activities Provide for commercial surface water activities where it can	Support	Supports the policy for commercial activities on water, with a request to redefine 'commercial activities' as submitted in the definitions chapter.	Seeks to redefine 'commercial activities' as submitted.
298.209	Alastair and Carrie Gibson	Activities on the Surface of Water	ASW-R1 Use of vessels for a recreational activity All zones Activity status: Permitted	Amend	Considers that prescribed noise limits for vessels may create reverse sensitivity for recreational lake use as houses are built nearby and suggests protecting existing uses.	Seeks to amend as follows: PER-2 The following noise limits are not exceeded at a notional boundary established prior to 1st March 2025:
298.210	Alastair and Carrie Gibson	Light	General	Support	Support for the chapter.	Seeks to retain as notified.
298.211	Alastair and Carrie Gibson	Noise	General	Support	No specific reasons given	Retain as notified
298.212	Alastair and Carrie Gibson	Signs	General	Support	General support for the chapter.	Seeks to retain as notified except for the submission points that follow.
298.213	Alastair and Carrie Gibson	Signs	SIGN-R7 Signs attached to a trailer, vehicle or vessel All zones Activity status: Non	Amend	Considers that the rule controlling signs on vehicles/trailers is ambiguous and may cause arbitrary decision-making and suggests clarifying exemptions for company vehicles and business operations.	Seeks to amend as follows: This rule does not apply to: 1.~~an advertising~~ sign painted or adhered directly onto company/fleet vehicles or trailers ~~which is incidental to the primary use of that vehicle or trailer;~~or 2. an advertising sign painted or adhered directly onto company/fleet vehicles or trailers ~~which are used in the day-to-day operation of that business;~~or

						3. businesses operating from a vehicle. ~~truck or caravan such as food vendors.~~
298.214	Alastair and Carrie Gibson	Temporary Activities	General	Support	Support for chapter with modification to remove the word 'light' from 'light aircraft' as this is not defined. Also refer to submission point on definitions chapter related to 'temporary activities'.	Seeks to replace ‘helicopter’ and ‘light aircraft’ with ‘aircraft' throughout the chapter.
298.215	Alastair and Carrie Gibson	Temporary Activities	TEMP-R6 Temporary helicopter and light aircraft take-offs and landings, excluding Ōamaru Airpo	Support	Considers that 'helicopter' is not a defined term and should be replaced with 'aircraft' [refer to submission point on definitions chapter related to 'temporary activities']	Seeks to replace ‘helicopter’ and ‘light aircraft’ with ‘aircraft' throughout the chapter.
298.216	Alastair and Carrie Gibson	General Rural Zone	GRUZ-O1 Purpose of the General Rural Zone The General Rural Zone provides for primary p	Support	Support the purpose of the general rural zone for primary production and that the rural zone provides vital socio-economic benefits to the District.	Retain as notified
298.217	Alastair and Carrie Gibson	General Rural Zone	GRUZ-O2 Character of the General Rural Zone The character of the General Rural Zone rem	Support	Support while recognising that odours are managed by the regional council. Support that primary production contributes to open character and maintenance of rural landscapes, and that a degree of built form is necessary to support the ongoing productivity of the rural zone.	Retain as notified
298.218	Alastair and Carrie Gibson	General Rural Zone	GRUZ-O3 Highly productive land The value and long-term benefits of using highly product	Support	Support - managing highly productive land is important to retain and support primary production in the rural environment, particularly where land is identified as being highly productive.	Retain as notified
298.219	Alastair and Carrie Gibson	General Rural Zone	GRUZ-O4 Rural amenity values A range of activities anticipated in the General Rural Zon	Support	Support for objective but considers there should be clearer guidance or a definition of rural amenity values.	Seeks to define 'amenity values' as follows: include; open space, primary production, low population and building density, pastoral and arable character interspersed with indigenous biodiversity, relative quietness compared to urban areas, and connection to land for cultural, recreational and historic reasons.
298.220	Alastair and Carrie Gibson	General Rural Zone	GRUZ-O5 Business development in rural areas Rural areas are retained for primary produc	Support	Support - recognition is important for enabling appropriate rural-based business activities that complement the zone’s purpose.	Retain as notified
298.221	Alastair and Carrie Gibson	General Rural Zone	GRUZ-P1 Protection of highly productive land Protect highly productive land for use by	Support	Support - important that identified highly productive land is protected for primary production.	Retain as notified
298.222	Alastair and Carrie Gibson	General Rural Zone	GRUZ-P2 Development in the General Rural Zone Maintain the rural character in the Gener	Support	Support for intent to maintain rural character while allowing flexibility for ancillary activities and existing uses, encouraging appropriate indigenous planting, and enabling quality staff housing and additional dwellings and recognising the diverse residential needs of rural operations without compromising housing standards.	Seeks to amend as follows: ... 4. encouraging the maintenance and enhancement of existing, and the planting of new, indigenous vegetation where appropriate; and

						5. providing for conservation activities; and 6. recognising and providing for lawfully established rural activities and minimising reverse sensitivity effects on primary production and ancillary activities of new development in the General Rural Zone; and 7. providing for a ~~single~~ minor residential unit on sites to facilitate residential choice and flexibility ~~while ensuring that the minor residential unit is subservient to the principal residential unit on the site.~~ 8. providing for multiple residential units on large sites to facilitate staff accommodation while ensuring building density is appropriate for the General Rural Zone.
298.223	Alastair and Carrie Gibson	General Rural Zone	GRUZ-P3 Design of development in rural areas Ensure that new development is well design	Support	Support for intent to ensure new development is appropriate for the environment and buildings and structures are necessary to support primary production.	Retain as notified
298.224	Alastair and Carrie Gibson	General Rural Zone	GRUZ-P4 Maintenance of clear urban, rural lifestyle and rural areas Maintain a clear di	Support	Support intent where there is a distinguishment of urban and rural environments but encourage flexibility for primary production activities on the rural fringe where adverse effects can be appropriately managed.	Seeks to amend as follows: Maintain a clear distinction between urban, rural lifestyle and rural areas through the use of clear land use zones and avoidance of ad-hoc subdivision where growth to Settlement or Rural Lifestyle zones has not been planned for unless the adverse effects can be avoided, remedied or mitigated.
298.225	Alastair and Carrie Gibson	General Rural Zone	GRUZ-P5 Intensive primary production Provide for intensive indoor primary production an	Support	Support as important that provision is made for intensive primary production in the rural zone where effects can be appropriately managed.	Retain as notified
298.226	Alastair and Carrie Gibson	General Rural Zone	GRUZ-P6 Integration of primary production with natural and cultural values Recognise th	Support	Support but seeks clarification that sensitive values do not apply across the entire GRUZ zone and recommend limiting specialist reports to identified overlays, and advocate for enabling new primary production activities.	Seeks to amend as follows: Recognise the importance of the identified landscape, heritage, biodiversity and mana whenua values and provide for continued and new primary production in these areas while avoiding, remedying or mitigating any adverse effects on the values.
298.227	Alastair and Carrie Gibson	General Rural Zone	GRUZ-P7 Intensive primary production and extractive industries in close proximity to settlemen	Support	Support intent that any new primary production and extractive industries avoid adverse effects on existing settlements.	Retain as notified
298.228	Alastair and Carrie Gibson	General Rural Zone	GRUZ-P8 Energy and resource efficiency Encourage minimisation of energy and water use a	Support	Support intent to promote energy and resource efficiency where appropriate, but note that the Energy chapter lacks sufficient permissiveness to effectively implement the policy.	Seeks to amend as follows: Encourage minimisation of energy and water use and the use of low impact design such as optimal site layout, passive solar design, solar power and water heating, and greywater recycling for any new development, where appropriate.
298.229	Alastair and Carrie Gibson	General Rural Zone	GRUZ-P9 Outline Development Plans Provide	Support	Support with clarification that recreational, heritage, and ecological values should be limited to those identified in the plan	Seeks to amend as follows:

			for any substantial development extension of		to avoid unnecessary reporting, and suggest using covenants or separation distances to manage adverse effects on new dwellings near the General Rural Zone.	... c. retains and supports the relationship to, and where possible enhances, identified recreational, heritage and ecological features and values; and d. is co-ordinated with the delivery of appropriate infrastructure; and e. achieves a high level of amenity; and f. specifies covenants and/or provides a sufficient separation distance of habitable buildings with the General Rural Zone to minimise the potential for reverse sensitivity effects.
298.230	Alastair and Carrie Gibson	General Rural Zone	GRUZ-R1 Building activity General Rural Zone Activity status: Permitted Where: PER-	Support	Support rule to provide for building activity in the rural zone and default to restricted discretionary where compliance can not be achieved.	Retain as notified
298.231	Alastair and Carrie Gibson	General Rural Zone	GRUZ-R2 Primary production (excluding carbon forestry otherwise provided for in GRUZ-R18, mini	Support	Support rule advocating for the protection of existing mining and quarrying activities in the General Rural Zone, and affirm that primary production is appropriately located within this zone.	Seeks to amend as follows: Primary production (excluding carbon forestry otherwise provided for in GRUZ-R18,newmining activity, new quarrying activities, new intensive indoor primary production and new intensive outdoor primary production)
298.232	Alastair and Carrie Gibson	General Rural Zone	GRUZ-R3 Amenity planting and shelterbelts General Rural Zone Activity status: Permitt	Support	Support with amendments to clarify that PER-1 may overly restrict amenity planting due to broad pest species criteria, and that PER-2 should regulate actual effects rather than speculative ones.	Seeks to amend as follows: PER-1 The amenity planting or shelterbelt does not involve planting of species that are, ~~or can become,~~ pest species as identified in any Regional Pest Management Plan; and PER-2 The amenity planting ~~will~~ does not shade any existing adjoining residential unit between the hours of 9:00am and 4:00pm, or any formed public road between 10:00am and 2:00pm, on the shortest day of the year; and
298.233	Alastair and Carrie Gibson	General Rural Zone	GRUZ-R4 Residential activity General Rural Zone Activity status: Permitted Activity	Support	No specific reason given	Retain as notified
298.234	Alastair and Carrie Gibson	General Rural Zone	GRUZ-R5 Residential unit General Rural Zone Activity status: Permitted Where: PER-1	Support	No specific reason given	Retain as notified
298.235	Alastair and Carrie Gibson	General Rural Zone	GRUZ-R6 Accessory building General Rural Zone Activity status: Permitted Activity s	Support	No specific reason given	Retain as notified

298.236	Alastair and Carrie Gibson	General Rural Zone	GRUZ-R7 Minor residential unit General Rural Zone Activity status: Permitted Where:	Support	Support in part, recommending it apply only to smaller sites, with staff housing for larger farms permitted through other provisions to ensure adequate and appropriate accommodation for rural workers.	Retain as notified
298.237	Alastair and Carrie Gibson	General Rural Zone	GRUZ-R8 Visitor accommodation General Rural Zone Activity status: Permitted Where:	Support	Support but recommend amending the five-person limit to better reflect actual building capacity and accommodate larger groups, such as tour parties, where adverse effects can be appropriately managed.	Seeks to amend as follows: PER-1 The visitor accommodation is limited to homestays accommodating no more than ~~5~~ 10 visitors at any one time; and
298.238	Alastair and Carrie Gibson	General Rural Zone	GRUZ-R9 Home business (excluding primary production activity) General Rural Zone Acti	Support	Support for enabling employment and entrepreneurialism in the rural zone, noting that effects like noise and visual impact are typically well managed through existing provisions, and recommend flexibility for outdoor storage and activities, with screening requirements clearly defined and not overly restrictive.	Seeks to amend as follows: ~~PER-1~~ ~~No more than 40m2 of the gross floor area of all buildings on the site is used for the home business; and~~ ~~PER-2~~PER-1 No more than one full time employee, or equivalent, ~~engaged in~~ working at the site of the home business, resides off-site; and ~~PER-3~~PER-2 No more than 2 heavy vehicle movements, and a total of 20 vehicle movements are generated in a 24-hour period for the home business; and ~~PER-4~~PER-3 Any on-site storage of materials associated with the home business is undertaken within buildings on the site, or is screened to a height of at least 1.2m from adjoining roads and sites; and ~~PER-5~~PER-4 The manufacturing, altering, repairing, dismantling or processing of any goods, or articles associated with the home business, take place within a buildingor is screened to a height of at least 1.2m from adjoining roads and sites.
298.239	Alastair and Carrie Gibson	General Rural Zone	GRUZ-R10 Intensive indoor primary production and intensive outdoor primary production G	Support	Support with modifications to avoid duplication of effluent consent requirements already managed by the Regional Council, and recommend aligning any remaining provisions with Regional Council's 150m notification threshold.	Seeks to amend as follows: PER-2 1. housed pigs are located no closer than 500m to a property boundary; and ~~2. no disposal or storage of effluent within 500m of a residential unit on any other site; and~~ 3. no intensive indoor primary production or intensive outdoor primary production of pigs occurs within ~~2 kilometres~~ 150m of a Residential, Settlement, or Open Space Zone; or PER-3 ... ~~2. no disposal or storage of effluent within 500m of a residential unit on any other site; and~~ 3. no intensive indoor primary production or intensive outdoor

						primary production of poultry occurs within ~~2 kilometres~~ 150m of a Residential, Settlement or Open Space Zone; or PER-4 For intensive indoor primary production or intensive outdoor primary production of any other species, there is: ~~1. no disposal or storage of effluent within 500m of a residential unit on any other site; and~~ 2. a setback of at least ~~2 kilometres~~ 150m from a Residential, Settlement or Open Space Zone.
298.240	Alastair and Carrie Gibson	General Rural Zone	GRUZ-R11 Recreational activity General Rural Zone Activity status: Permitted Activi	Support	No specific reasons given	Retain as notified
298.241	Alastair and Carrie Gibson	General Rural Zone	GRUZ-R12 Flood protection structures General Rural Zone Activity status: Permitted	Support	No specific reasons given	Retain as notified
298.242	Alastair and Carrie Gibson	General Rural Zone	GRUZ-R13 Conservation activities General Rural Zone Activity status: Permitted Acti	Support	No specific reasons given	Retain as notified
298.243	Alastair and Carrie Gibson	General Rural Zone	GRUZ-R14 Commercial activity General Rural Zone Activity status: Permitted Where: P	Support	Support with amendments to allow farm shops to sell a broader range of locally produced primary goods, ideally within a 100km radius, while maintaining rural character and avoiding expansion into general retail.	Seeks to amend as follows: PER-1 Retail sales are limited to: 1. food sourced from primary production activities within a 100km radius of the site ~~farming produce (including milk, fruit, vegetables, plants, flowers, or eggs) produced on the site, or honey processed on the site; or~~
298.244	Alastair and Carrie Gibson	General Rural Zone	GRUZ-R15 Aeroplane airstrips and helicopter landing areas, and the use of these by aircraft	Oppose	Considers that the aircraft movement limit should be increased to 32 per month for flexibility, and that no limit should apply where sufficient setbacks ensure there are no adverse effects at the nearest boundary.	Seeks to amend as follows: PER-3 The use of the landing area or airstrip is for any other activity which results in no more than ~~8 aircraft movements per week (4 take-offs and 4 landings)~~ 32 aircraft movements per month; or PER-4 The airstrip is more than 1,000m from the nearest notional boundary under different ownership; or
298.245	Alastair and Carrie Gibson	General Rural Zone	GRUZ-R16 Papakāika within land held under Te Ture Whenua Māori Act 1993 or within a Native Res	Support	No specific reason given	Retain as notified
298.246	Alastair and Carrie Gibson	General Rural Zone	GRUZ-R17 Seasonal Worker accommodation General	Oppose	Supports the need for seasonal worker housing but oppose limitations that encourage sub-standard accommodation,	Seeks to amend as follows:

			Rural Zone Activity status: Permit		advocating instead for flexible, self-contained, and higher-quality options that respect the dignity and needs of workers.	PER-1 The minor residential unit or building ~~and/or any campsite~~ is only to be used by workers employed on the site; and PER-2 The seasonal worker accommodation is located on a site that is a minimum of 20ha; and ~~PER-3~~ ~~Any building is relocatable or able to be reconfigured to a building accessory to land-based primary production; and~~ ~~PER-4~~ ~~Any seasonal worker accommodation contains no more than one kitchen facility; and~~ PER-5 ~~Any building used for seasonal worker accommodation is no more than 125m2 gross floor area; and~~ PER-6 Any building used for seasonal worker accommodation provides for a maximum of 10 occupants; and ~~PER-7~~ ~~The maximum area used for camping as part of any seasonal worker accommodation shall be 1000m2 and be located at least 100m from any residential unit on an adjoining site.~~
298.247	Alastair and Carrie Gibson	General Rural Zone	GRUZ-R18 Carbon forestry General Rural Zone Activity status: Permitted Where: PER-1	Support	Support with modifications to permit suitable indigenous species for carbon forestry, align setback rules with biodiversity provisions, correct wording around pest species, and remove unnecessary restrictions that conflict with broader plan objectives to enhance native biodiversity.	Seeks to amend as follows: PER-1 The species of planting are indigenous ~~to the ecological district in which the activity is to take place;~~ and ... PER-4 ~~4. within 10m of a Significant Natural Area; and~~ PER-5 The carbon forestry activity ~~does not involve the planting~~ avoids an increase in scale or intensity of any pest, pest agent, or organism of interest identified in the relevant Regional Pest Management Plan; and ~~PER-6~~ ~~The carbon forestry utilises no more than 50% of any site.~~

298.248	Alastair and Carrie Gibson	General Rural Zone	GRUZ-R19 Rural Industry General Rural Zone Activity status: Restricted Discretion	Support	Support with more permissive settings to reflect the functional and operational needs of rural industries, noting that site design and infrastructure are developer decisions and that adverse effects are already managed through other chapters in the plan.	Seeks to amend as follows: Activity status:~~Restricted Discretionary~~ Permitted Where: PER-1 The activity is not a potentially high-impact industrial activity. Note: consent may be required under the Transport chapter. ~~Matters of discretion are restricted to:~~ ~~1. the suitability of the location, site design and layout; and~~ ~~2. the intensity and scale of the activity; and~~ ~~3. the extent of adverse effects on existing or permitted activities; and~~ ~~4. the extent of adverse effects on the safe and efficient operation of the road network, and suitability of onsite loading, manoeuvring and access; and~~ ~~5. the provision of infrastructure to service the activity.~~
298.249	Alastair and Carrie Gibson	General Rural Zone	GRUZ-R20 Papakāika where not otherwise provided for under GRUZ-R16 General Rural Zone	Support	No specific reason given	Retain as notified
298.250	Alastair and Carrie Gibson	General Rural Zone	GRUZ-R21 Community facility General Rural Zone Activity status: Discretionary Activ	Support	No specific reason given	Retain as notified
298.251	Alastair and Carrie Gibson	General Rural Zone	GRUZ-R22 Industrial activity General Rural Zone Activity status: Discretionary Acti	Support	No specific reason given	Retain as notified
298.252	Alastair and Carrie Gibson	General Rural Zone	GRUZ-R23 Any other activity not provided for as a permitted, restricted discretionary, non-com	Support	No specific reason given	Retain as notified
298.253	Alastair and Carrie Gibson	General Rural Zone	GRUZ-R24 Retirement village General Rural Zone Activity status: Non-Complying Activ	Support	No specific reason given	Retain as notified
298.254	Alastair and Carrie Gibson	General Rural Zone	GRUZ-R25 Educational facility General Rural Zone Activity status: Non-Complying Act	Oppose	Opposes the non-complying activity status for schools in rural zones and considers that their rural character typically minimises reverse sensitivity risks and that access to education should be balanced with protecting primary production.	Seeks to amend the activity to a permitted activity with appropriate setbacks for buildings for the educational facility or restricted discretionary.
298.255	Alastair and Carrie Gibson	General Rural Zone	GRUZ-S1 Residential site density The maximum density of residential units on any site	Support	No specific reason given	Retain as notified

298.256	Alastair and Carrie Gibson	General Rural Zone	GRUZ-S2 Maximum height All building and structures must not exceed a maximum height of	Support	Support GRUZ-S2 with amendment to reflect that grain silos can be up to 25m in height.	Seeks to amend as follows: 1. All building and structures must not exceed a maximum height of: ... 2.~~15m~~ 25m for grain silos; ...
298.257	Alastair and Carrie Gibson	General Rural Zone	GRUZ-S3 Building coverage The building coverage for any site shall not exceed 20%. Rai	Support	No specific reason given	Retain as notified
298.258	Alastair and Carrie Gibson	General Rural Zone	GRUZ-S4 Road and rail setbacks A stock loading ramp or race with its entry/exit point	Support	Support with modification to allow stock loading ramps angled to the road, provided there is at least 30m of space to accommodate full off-road parking and manoeuvring.	Seeks to amend as follows: 1. A stock loading ramp or race with its entry/exit point located facing a road, including a State Highway, shall not be located within ~~a~~ 30m ~~setback~~ from the road boundary in the direction the loading ramp faces. 2. A stock loading ramp or race with its entry/exit point running parallel or away from ~~to~~ the road is exempt from this standard.
298.259	Alastair and Carrie Gibson	General Rural Zone	GRUZ-S5 Internal boundary setbacks The minimum setback of any part of a building or str	Support	No specific reason given	Retain as notified
298.260	Alastair and Carrie Gibson	General Rural Zone	GRUZ-S6 Frontage fencing Any fencing within a road boundary setback or internal bounda	Support	Support with modification to exempt the curtilage of residential and minor residential units, allowing more residential-style fencing around homes while retaining appropriate rural fencing elsewhere in the zone.	Seeks to amend as follows: 1. Any fencing within a road boundary setback or internal boundary setback shall be post and netting, post and wire, or post and rail fencing. 2. Fencing of residential units and minor residential units is exempt from this standard.
298.261	Alastair and Carrie Gibson	General Rural Zone	GRUZ-S7 Crop protection structures Dark green or black cloth is used for all vertical	Oppose	Considers there should be justification for colour and size restrictions.	Seeks to delete or provide evidence or justification for colour and size restrictions.
298.262	Alastair and Carrie Gibson	General Rural Zone	GRUZ-S8 Hours of operation Any activity (other than a residential activity or visitor	Support	Support intent to limit hours for rural amenity protection but considers the matters of discretion should also address potential reverse sensitivity effects on primary production activities.	Seeks to amend as follows: Matters of discretion are restricted to: ... 2. any adverse effects on the amenity values of properties on any adjoining residential sites; and 3. any reverse sensitivity effects on primary production.
298.263	Alastair and Carrie Gibson	General Rural Zone	GRUZ-S9 Servicing and firefighting water supply and access All new buildings must be c	Oppose	Oppose in part, supporting its intent to ensure buildings are appropriately serviced but recommending flexibility for farm and accessory buildings that do not require reticulated services to avoid unrealistic expectations.	Seeks to amend as follows: 1. All new residential buildings must be connected to reticulated services where these are available; and 2. All new residential buildings must comply with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PA

						4509:2008 unless written approval is provided from Fire and Emergency New Zealand regarding an alternative firefighting water supply.
298.264	Alastair and Carrie Gibson	Transport	TRAN-O1 On-site transport facilities and access Use and development has safe and effective	Support	No specific reason given	Retain as notified
298.265	Alastair and Carrie Gibson	Transport	TRAN-O2 High trip generating use and development The safety and efficiency of the transpor	Support	No specific reason given	Retain as notified
298.266	Alastair and Carrie Gibson	Transport	TRAN-O3 Transport network The transport network is effective, accessible and integrated	Support	No specific reason given	Retain as notified
298.267	Alastair and Carrie Gibson	Transport	TRAN-P1 High trip generating use and development Provide for high vehicle trip generato	Support	Support with modification to clarify the term 'surrounding area' in Point 5, as it is currently vague and may lead to inconsistent interpretation.	Seeks to amend as follows: ... 5. the effect of the proposed activity on the character and amenity values of the surrounding ~~area~~ adjoining sites; and ...
298.268	Alastair and Carrie Gibson	Transport	TRAN-P2 Appropriate on-site transport facilities Enable on-site transport facilities where	Oppose	Opposes the policy as it addresses only on-site effects and considers that internal site use is typically managed by landowners and industry standards, and that provisions should focus on impacts beyond the site to align with TRAN-O1 and avoid unnecessary safety risks.	Seeks to amend as follows: Enable on-site transport facilities where these: 1. meet industry standards; and 2. are of a location and design that provides for: a. public health and safety; and ~~b. the safe and efficient use of the site; and~~ c. the safe and efficient functioning of the transport network; and d. the reasonable loading and access demands generated by the use of the site; and e. the safe and effective access for firefighting purposes. ~~3. promote the uptake and use of the active transport network.~~
298.269	Alastair and Carrie Gibson	Transport	TRAN-P3 Potentially appropriate on-site transport facilities Only allow for on-site tra	Oppose	Considers the policy unnecessary as relevant matters are already addressed unless they regulate internal effects. Considers it should focus solely on firefighting access and remove provisions targeting off-site effects.	Seeks to amend as follows: Only allow for on-site transport facilities that do not meet industry standards where it can be demonstrated, if applicable, that: ~~1. the design is in response to site and/or topographical constraints; and~~
298.270	Alastair and Carrie Gibson	Transport	TRAN-P4 Vehicle crossings Provide for safe and efficient	Support	Support to the extent that it applies to new vehicle crossings.	Seeks to amend as follows:

			connections between the transp			Provide for safe and efficient connections between the transport network and on-site transport facilities by requiring new vehicle crossings to roads to address: ...
298.271	Alastair and Carrie Gibson	Transport	TRAN-P5 Regionally Significant Infrastructure Recognise the social, economic, cultural	Support	Support, particularly the definition of Regionally Significant Infrastructure.	Retain as notified
298.272	Alastair and Carrie Gibson	Transport	TRAN-P6 Multi-modal and active transport Encourage activities to incorporate opportunitie	Oppose	Considers to be overly strong in wording and that cycling/pedestrian modes are more hazardous and should not be encouraged where full cycling infrastructure is not available.	Seeks to amend as follows: ~~Encourage~~ Promote activities to incorporate opportunities for multi-modal and active transport, including cycle parking and end of trip facilities if the site is served by the active transport network where it separates cyclists and pedestrians.
298.273	Alastair and Carrie Gibson	Transport	TRAN-P8 Upgrading of the transport network Provide for the upgrading or development of	Support	Considers clearer guidance needed on when to respond to earthworks effects, suggesting the policy be limited to landscape and ecological values identified in overlays and chapters of the plan.	Seeks to amend as follows: ... 8. responds to site and topographical constraints including opportunities to reduce the effects of earthworks on identified landscape and ecological values; ...
298.274	Alastair and Carrie Gibson	Transport	TRAN-P9 Roads as infrastructure corridors Encourage the use of roads as infrastructure	Support	No specific reason given	Retain as notified
298.275	Alastair and Carrie Gibson	Transport	TRAN-P10 Road classification Classify roads according to their function and anticipated	Support	No specific reason given	Retain as notified
298.276	Alastair and Carrie Gibson	Transport	General	Oppose	Considers that rural zones should be exempt from policies that may pressure developers to fund cycle and footpaths where they offer no practical benefit and seeks clarification that policies apply only to new activities, noting that technical evidence from the WDC roading department is needed to support provisions for road crossings.	Seeks to have submission points considered across all TRAN provisions and for the roading department to reply to this submission at further hearings commenting on the TRAN chapter overall.
298.277	Alastair and Carrie Gibson	Transport	TRAN-R1 Vehicle crossings onto roads All zones Activity status: Permitted Where: PE	Support	Support for new vehicle crossings subject to submission point 298.276.	Seeks to amend as follows: TRAN-R1 New Vehicle crossings onto roads
298.278	Alastair and Carrie Gibson	Transport	TRAN-R2 Site access for activities without any on-site vehicle parking space or loading spaces	Support	Support with modifications to clarify that pedestrian and cycling access requirements should not apply in zones where vehicle travel is operationally necessary, such as due to distance.	Seeks to amend as follows:

						TRAN-R2 Site access for new activities without any on-site vehicle parking space or loading spaces PER-1 All of the following standards are complied with where relevant: 1. TRAN-S1 Pedestrian and cycling access in Residential Zones; 2. TRAN-S2 Firefighting access
298.279	Alastair and Carrie Gibson	Transport	TRAN-R3 On-site parking, loading, and access All zones Activity status: Permitted W	Oppose	Considers the provision overregulates internal site effects unrelated to the transport network, particularly dairy lanes and private access already covered under TRAN-S3, and finds TRAN-S5 overly restrictive by limiting vehicle standing, queuing, and manoeuvring within a site that are inherent and internal and should not be subject to standards.	Seeks to delete TRAN-S7 and TRAN-S8 from the rule.
298.280	Alastair and Carrie Gibson	Transport	TRAN-S9 Accessible parking spaces Where parking spaces are provided on site: any on-si	Support	Support subject to submissions from disability advocate organisations, particularly with reference to rural sites.	Retain as notified
298.281	Alastair and Carrie Gibson	Transport	TRAN-S10 Design requirements for on-site vehicle parking spaces Where parking spaces ar	Oppose	Considers the managing of internal site effects inconsistent with TRAN-O1 and recommends it be amended to clarify that it does not apply to rural or residential zones.	Seeks to provide clarification that the standard does not apply to rural and residential zones.
298.282	Alastair and Carrie Gibson	Transport	TRAN-S11 Surface of parking and loading areas The surface of all parking and loading a	Oppose	Considers that setting a low car park threshold would place undue burden on rural zones, and that regulating internal site effects is inconsistent with TRAN-O1.	Seeks to provide clarification that the standard does not apply to rural and residential zones.
298.283	Alastair and Carrie Gibson	Transport	TRAN-S12 On-site cycle parking All developments, excluding residential units and prima	Amend	Considers that while TRAN-S12 excludes primary production, it should also exclude rural zones due to long travel distances and lack of separated cycleways, noting that many related standards are similarly irrelevant in rural contexts.	Seeks to provide clarification that the standard does not apply to rural zones.
298.284	Alastair and Carrie Gibson	Transport	TRAN-S12 On-site cycle parking All developments, excluding residential units and prima	Oppose	Considers standard to be overly prescriptive regarding the standard of cycle parking.	Seeks to provide clarification that the standard does not apply to rural and residential zones
298.285	Alastair and Carrie Gibson	Transport	TRAN-R3 On-site parking, loading, and access All zones Activity status: Permitted W	Oppose	Opposes incorporating Australian and New Zealand Standards by reference in the district plan due to their cost, copyright restrictions, external review processes, and inefficiency and considers the PDP should include locally specified standards to avoid financial barriers and regulatory outsourcing.	Seeks to use standards acceptable to the WDC roading department which are written into the plan to be freely available. Delete TRAN-R3. Alternatively, if retained sees to amend as follows All zones except Rural Lifestyle Zone, General Rural Zone, Macraes Mining Zone and Settlement Zone. PER-1 All of the following standards are complied with where relevant; 1. TRAN-S2 Firefighting access;

						~~2. TRAN-S3 Service lanes, private ways, private roads, pedestrian accessways and walkways;~~ ~~3. TRAN-S4 Reverse manoeuvring;~~ ~~4. TRAN-S5 Design standards for vehicle manoeuvring areas;~~ 5. TRAN-S6 Service stations and truck stops; ~~6. TRAN-S7 On-site loading spaces for non-residential activities;~~ ~~7. TRAN-S8 Design requirements for loading and vehicle standing spaces;~~ 8. TRAN-S9 Accessible parking spaces; ~~9. TRAN-S10 Design requirements for on-site vehicle parking spaces;~~ ~~10. TRAN-S11 Surface of parking and loading areas;~~ ~~11. TRAN-S12 On-site cycle parking.~~ Matters of discretion are restricted to: 1. the matters of discretion listed in any of the standards TRAN-S2,~~TRAN-S3, TRAN-S4, TRAN-S5,~~ TRAN-S6,~~TRAN-S7, TRAN-S8,~~TRAN-S9, ~~TRAN-S10, TRAN-S11, and/or TRAN-S12~~ that are not complied with.
298.286	Alastair and Carrie Gibson	Transport	TRAN-R4 Vehicle trip generating activities All zones Activity status: Permitted Whe	Support	Supports with changes to reduce the consent threshold and controlling the activity directly by the number of traffic movements rather than using proxies like gross floor area.	Retain as notified with changes to Table 6 - High Trip Generator Thresholds.
298.287	Alastair and Carrie Gibson	Transport	TRAN-R5 Walkways, cycleways and shared paths which are located on public land other than a roa	Support	Support with amendment to replace the Austroads Guide with a specific standard to ensure oversight of future changes is under WDC control.	Seeks to retain as notified with changes to TRAN-S20.
298.288	Alastair and Carrie Gibson	Transport	TRAN-R6 Extensions and new vehicle access tracks ancillary to infrastructure, outside of any o	Support	Support with amendment to apply within overlays as extensive coverage of the Rural Scenic and Outstanding Natural Landscapes overlays makes it overly restrictive if excluded, and considers infrastructure access should take precedence over overlay values without requiring consent or incurring additional costs.	Seeks to amend as follows: TRAN-R6 Extensions and new vehicle access tracks ancillary to infrastructure, ~~outside of any overlay~~
298.289	Alastair and Carrie Gibson	Transport	TRAN-S3 Service lanes, private ways, private roads, pedestrian accessways and walkways	Support	Support if restricted to public ways only and specifies a standard rather than requiring purchase of the standard.	Seeks to amend as follows: TRAN-S3 Service lanes, ~~private ways, private roads,~~ pedestrian accessways and walkways <u>on public land.</u> 1. Service lanes, private ways, private roads, pedestrian accessways and walkways on <u>public land</u> must be designed and constructed in accordance with <u>[describe standards here]</u> ~~NZS 4404:2010 Land Development and Subdivision Infrastructure; except where Table 7 Minimum legal widths and formation requirements for private ways/vehicle access lots replaces the formation requirements of private ways for residential units detailed in NZS 4404:2010.~~

298.290	Alastair and Carrie Gibson	Transport	TRAN-S5 Design standards for vehicle manoeuvring areas Areas must be provided on a sit	Oppose	Considers the standard overly restrictive by requiring all vehicle standing, queuing, and manoeuvring to occur entirely within a site, including areas inherently used for such purposes, making on-street parking non-compliant and imposing internal site controls unrelated to TRAN-O1.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. Areas must be provided on a site for vehicles to stand, queue and make all necessary manoeuvres on site without using the road or State Highway, ~~and without~~ using the area provided for parking space, servicing, loading space or outdoor storage ~~purposes;~~ and ...Matters of discretion are restricted to: 1. the safety and movement of pedestrians, cyclists, public transport and general traffic on the road corridor.
298.291	Alastair and Carrie Gibson	Transport	TRAN-S7 On-site loading spaces for non-residential activities The number of loading sp	Oppose	Considers the standard inappropriate for rural contexts and that it imposes unnecessary discretion over loading needs best determined by the operator. Also considers that it relies on outdated and inaccessible standards and should instead include explicit provisions within the plan.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. The number of loading spaces for any non-residential activity must not be less than that shown in Table 8 – Minimum loading space requirements for non-residential activities below and must be provided on-site, except in the Town Centre Zone and rural zones. ... 3. Neither Clause 1 or 2 above apply to sites of less than 50m2 that are used for infrastructure purposes, or to primary production. Matters of discretion are restricted to: 1. the effective, efficient and safe operation of the transport network; and ~~2. the identified loading needs of the activity.~~
298.292	Alastair and Carrie Gibson	Transport	TRAN-S8 Design requirements for loading spaces and vehicle standing spaces Loading spa	Oppose	Considers the standard inappropriate for rural conditions and imposes unnecessary discretion over loading needs. Also considers the standard relies on outdated and inaccessible standards, and should instead include clear, explicit provisions within the plan.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. Loading spaces and vehicle standing spaces required under TRAN-S5 must be designed, constructed and maintained in accordance with [produce a specific standard in the text here].~~AS 2890.2.2002 Parking facilities Part 2: Off-street commercial vehicle facilities, for the specified minimum design vehicle.~~ Matters of discretion are restricted to: 1. the effective, efficient and safe operation of the transport network; and ~~2. the identified loading and vehicle space needs of the activity.~~

298.293	Alastair and Carrie Gibson	Transport	TRAN-S9 Accessible parking spaces Where parking spaces are provided on site: any on-si	Support	Support subject to submission(s) from disability advocate organisations, particularly regarding application to rural zones.	Seeks to retain with any amendments requested by disability advocate organisations and disabled people.
298.294	Alastair and Carrie Gibson	Transport	TRAN-S10 Design requirements for on-site vehicle parking spaces Where parking spaces ar	Oppose	Considers the standard imposes design requirements that are unclear or unsuitable for rural and residential contexts and regulates internal site effects inconsistent with TRAN-O1.	Seeks to amend as follows: Where parking spaces are provided on a site: 1. car parking must comply with the requirements of [provide standard here] ~~AS 2890.1:2004 Parking facilities Part 1: Off-street car parking,~~ except for: a. a parking space in a garage or carport; or b. staff parking that is provided as stacked parking of no more than two vehicles, or c. parking for residential or primary production activity. ...
298.295	Alastair and Carrie Gibson	Transport	TRAN-S11 Surface of parking and loading areas The surface of all parking and loading a	Oppose	Considers the standard imposes unnecessarily low thresholds and surface requirements on parking and loading areas in rural and residential zones, regulates internal site effects inconsistent with TRAN-O1, and conflicts with permitted pathways for multiple residential units.	Seeks to delete or include as advice note. Alternatively, seeks to amend as follows: 1. The surface of ~~all~~ parking and loading areas must either be: ... 2. Clause 1 does not apply where a site contains parking for ~~one~~ residential units or primary production activity.
298.296	Alastair and Carrie Gibson	Transport	TRAN-S12 On-site cycle parking All developments, excluding residential units and prima	Oppose	Considers the standard inappropriately applies cycle parking requirements in rural areas where cycling is impractical and potentially unsafe, and is overly prescriptive in its design standards.	Seeks to delete the standard. Alternatively, seeks to amend as follows: 1. All developments, excluding residential units and primary production, ~~must~~ should provide cycle parking at a rate of 1 cycle parking for every 10 car parking spaces provided; and 2. cycle parking ~~must~~ should meet the following minimum specifications: a. cycle parking facilities ~~must~~ should be: i. signposted or visible to cyclists entering the site; and ~~ii. located as close as possible to, and no more than 15m from at least one main pedestrian public entrance to the building/activity; and~~ iii. located so they do not impede pedestrian thoroughfares, including areas used by people whose mobility or vision is restricted; and iv. clear of vehicle parking or manoeuvring areas; ~~b. cycle parking facilities must be available during the activity's hours of operation and must not be impeded by any structure, storage of goods, landscape planting or other use; and~~ ~~c. long stay cycle parking facilities (for staff or residents) must be located:~~ ~~i. in a covered area; and~~

						~~ii. in an area where access by the general public is generally excluded.~~ ~~Note: Refer to the Austroads Bicycle Parking Facilities: Guidelines for design and installation: October 2-16 (AP-R527-16).~~ Matters of discretion are restricted to: ... 4. whether cycling is a safe method of transport to the site.
298.297	Alastair and Carrie Gibson	Transport	TRAN-S13 Width and number of vehicle crossings onto roads Every lot with direct vehicl	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
298.298	Alastair and Carrie Gibson	Transport	TRAN-S14 Formation and sealing of vehicle crossings All vehicle crossings onto a seale	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
298.299	Alastair and Carrie Gibson	Transport	TRAN-S15 Distance between vehicle crossings and road intersections the distance betwee	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
298.300	Alastair and Carrie Gibson	Transport	TRAN-S16 Sight distances from vehicle crossings Any vehicle crossing onto a road other	Support	Support subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
298.301	Alastair and Carrie Gibson	Transport	Table 6 – High trip generator thresholds	Support	Supports the thresholds with modification to raise the lower limits, as considers there is no technical evidence supporting the current thresholds and managing effects through vehicle movements is more appropriate. Also considers that valuable services such as emergency, healthcare, education, recreation, and community facilities should be given higher permitted thresholds to reduce consent barriers and better reflect their social importance.	Seeks to incorporate management of the effects from publicly owned or funded educational facilities managed by TRAN-R8 when a road needs upgraded to meet effects from an exceeded threshold. [refer to original submission for full relief sought]
298.302	Alastair and Carrie Gibson	Transport	Table 7 – Minimum legal widths and formation requirements for private ways/access lots	Oppose	Considers the table unnecessarily duplicates TRAN-S2 by applying minimum legal widths and formation requirements to private ways, manages only internal site effects, and relies on inaccessible standards without supporting technical evidence.	Seeks to amend as follows: Table 7 – Minimum legal widths and formation requirements for ~~private ways/~~access lots
298.303	Alastair and Carrie Gibson	Energy	General	Oppose	Considers that the chapter does not adequately reflect the benefits and low environmental impact of renewable energy and places excessive consent burdens on activities that should be encouraged, especially those generating electricity at the point of consumption to reduce demand on large-scale infrastructure.	Seeks for the chapter to reflect the benefits and low environmental impact of renewable energy and to reduce consent burdens on these activities [inferred relief requested].
298.304	Alastair and Carrie Gibson	Energy	ENG-O1 Recognising the benefits of renewable	Support	No specific reasons given	Retain as notified

			electricity generation The significant local,			
298.305	Alastair and Carrie Gibson	Energy	ENG-O2 Design and location of renewable electricity generation Renewable electricity ge	Support	No specific reasons given	Retain as notified
298.306	Alastair and Carrie Gibson	Energy	ENG-O3 Protecting the values and qualities of any overlay Waitaki District's overlays a	Oppose	Considers that not all overlays are equal and not all renewable energy methods are equal.	Seeks to amend as follows: ENG-O3 Protecting the values and qualities of ~~any~~ overlay Waitaki District's overlays are protected as far as practicable from ~~the~~ any significant adverse effects of renewable electricity generation activities.
298.307	Alastair and Carrie Gibson	Energy	ENG-P1 Recognising the benefits of renewable electricity generation Recognise the local, r	Support	No specific reason given	Retain as notified
298.308	Alastair and Carrie Gibson	Energy	ENG-P2 Existing activities Enable the ongoing refurbishment, maintenance and repair, an	Support	No specific reasons given	Retain as notified
298.309	Alastair and Carrie Gibson	Energy	ENG-P3 Effects on renewable electricity generation activities Only allow new sensitive act	Support	No specific reasons given	Retain as notified
298.310	Alastair and Carrie Gibson	Planning Maps	General	Oppose	Opposes in part the Canterbury Flood Overlay due to elevation-based anomalies and mapping inaccuracies, particularly around Maerewhenua River, Grants Rd, Little Rd, and Dip Hill Rd, and considers that this raise doubts about the overlay's validity and consistency with known plan errors such as those at Ōmārama.	Seeks for a review of the Canterbury Flood Assessment overlay mapping.
298.311	Alastair and Carrie Gibson	Energy	ENG-P4 Small scale renewable electricity generation activities and investigation activities ou	Support	Supports with amendments to also enable small scale renewable electricity generation activities within overlays, particularly extensive overlays such as ONL and RSL where entire properties are affected. Considers energy-related overlays (e.g., National Grid yard, Waitaki Power Scheme) should not restrict renewable energy generation and that natural hazard overlays are generally irrelevant to renewable energy effects beyond structural limitations. Considers small-scale renewable energy generation should be enabled across all overlays, with large-scale activities controlled only within identified overlays. Also considers that the PDP should "recognise and provide for" small-scale renewable electricity generation to align with the NPS-REG.	Seeks to amend as follows: ENG-P4 Small scale renewable electricity generation activities and investigation activities ~~outside of overlays~~ ~~Enable~~ Recognise and provide for small scale renewable electricity generation activities and activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation activities, ~~where:~~ ~~1. it is of a form, location and scale that minimises adverse effects on the environment; and~~ ~~2. it is consistent with the anticipated amenity values and character of the zone; and~~ ~~3. where it is demonstrated that all adverse effects on an overlay~~

						~~cannot be avoided, it appropriately offsets or compensates the adverse effects.~~
298.312	Alastair and Carrie Gibson	Energy	ENG-P5 Small scale renewable electricity generation activities and investigation activities in	Oppose	Considers that small-scale renewable energy generation should be provided for under the NPS-REG as its effects are minor and existing overlay chapters already manage structural impacts. Considers that discouraging such activities may lead to greater reliance on large-scale projects with more significant effects.	Seeks to delete the policy. Alternatively, seeks to amend as follows: ~~Only allow~~ Recognise and provide for small scale renewable electricity generation activities and activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation activities within an overlay where: 1. if located on buildings, items and sites identified in SCHED2 – Historic Heritage Items, SCHED3 – Character Contributing Buildings and non-contributing buildings where the building is a character contributing building, and SCHED5 – Sites and Areas of Significance to Māori: a. its location is sympathetic to the identified values where practicable; and b. ~~any structure is not visible from any adjoining public place and~~ where practicable, is aligned with the plane of the roof where located on a roof; 2. if located within the root protection area of a tree identified in SCHED4 - Notable Trees, the work will not likely compromise the long-term health, natural life or values of the Notable Tree; ... ~~5. it is demonstrated that all adverse effects on the values of the relevant overlay cannot be avoided, it appropriately offsets or compensates the adverse effects.~~
298.313	Alastair and Carrie Gibson	Energy	ENG-P6 Large scale renewable electricity generation activities Provide for large scale	Support	Considers that large scale activities have more significant effects and it is appropriate to manage them.	Retain as notified
298.314	Alastair and Carrie Gibson	Energy	ENG-P7 Large scale renewable electricity generation activities in other zones and within overl	Support	Considers that large scale activities have more significant effects and it is appropriate to manage them.	Retain as notified
298.315	Alastair and Carrie Gibson	Energy	ENG-P8 New technology Recognise the opportunity for new technology in renewable electri	Support	No specific reasons given	Retain as notified
298.316	Alastair and Carrie Gibson	Energy	ENG-P9 Decommissioning of renewable electricity generation activities Require that, during	Support	No specific reasons given	Retain as notified
298.317	Alastair and Carrie Gibson	Energy	ENG-R1 The operation, maintenance, and	Support	No specific reasons given	Retain as notified

			refurbishment of existing renewable electricity generat			
298.318	Alastair and Carrie Gibson	Energy	ENG-R2 The operation, maintenance, and refurbishment of existing renewable electricity generat	Support	No specific reasons given	Retain as notified
298.319	Alastair and Carrie Gibson	Energy	ENG-R3 Small scale renewable electricity generation activities outside of an overlay Al	Support	Support but considers it should also apply within overlays subject to the provisions of the relevant chapter in that overlay.	Seeks to amend as follows: ENG-R3 Small scale renewable electricity generation activities ~~outside of an overlay~~
298.320	Alastair and Carrie Gibson	Energy	ENG-R4 Investigation activities outside of an overlay All zones Activity status: Perm	Support	No specific reasons given	Retain as notified
298.321	Alastair and Carrie Gibson	Energy	ENG-R5 Small scale renewable electricity generation activities and investigation activities in	Oppose	Considers small-scale renewable generation should be permitted activities as they are low impact and a restricted discretionary status adds disproportionate costs that discourage such activities and conflict with the NPS-REG.	Seeks to delete the rule and manage with ENG-R3. Alternatively, seeks to amend to a controlled activity [refer to original submission for full relief sought]
298.322	Alastair and Carrie Gibson	Energy	ENG-R6 Small scale renewable electricity generation activities and investigation activities wi	Support	No specific reasons given	Retain as notified
298.323	Alastair and Carrie Gibson	Energy	ENG-R7 Large scale renewable electricity generation activities General Rural Zone Act	Oppose	Considers that renewable energy as a non-complying activity across overlays contradicts the NPS-REG, especially where overlays are intended for energy generation, and given that adverse effects are already managed by other chapters, the activity should be (restricted) discretionary.	Seeks to amend as follows: Activity status: <u>Restricted</u> Discretionary [refer to original submission for full relief sought]
298.324	Alastair and Carrie Gibson	Energy	ENG-R8 Other renewable electricity generation activities not otherwise provided for All	Oppose	Considers the rule is unclear in scope and appears to pre-emptively control assumed future effects without justification and this will discourage innovation and renewable energy generation contrary to the NPS-REG. Considers any necessary controls should be addressed in relevant chapters only when actual effects are known.	Seeks to delete ENG-R8 and manage the effects within the relevant zone or overlay chapter.
298.325	Alastair and Carrie Gibson	Energy	ENG-S1 Small scale solar panels All zones The panel must not exceed the permitted bu	Support	No specific reasons given	Retain as notified
298.326	Alastair and Carrie Gibson	Energy	ENG-S2 Small scale roof mounted wind turbines All zones The turbine (including the f	Support	No specific reasons given	Retain as notified
298.327	Alastair and Carrie Gibson	Energy	ENG-S3 Small scale freestanding wind turbines	Support	No specific reasons given	Retain as notified

			General Rural Zone Special Purpose Zo			
298.328	Alastair and Carrie Gibson	Energy	ENG-S4 Small scale hydro generators General Rural Zone Rural Lifestyle Zone Industr	Support	Supports with amendments as the 200m^2 limit is too restrictive for stored water and the dam height is better regulated under the Dam Safety Regulations 2022. Considers the matters of discretion vague, such as 'suitability of the site' and lack clarity and justification, especially when many dams relate to existing water bodies or irrigation systems.	Seeks to amend as follows: 1. The maximum surface area of any stored water solely for hydro electricity does not exceed 200m2; and 2. the maximum height of a weir or dam solely for hydro electricity does not exceed 2m; and 3. the maximum installed capacity does not exceed 4 megawatts (MW). Matters of discretion are restricted to: ... ~~3. the suitability of the site for the proposed activity; and~~ ...
298.329	Alastair and Carrie Gibson	Earthworks	EW(Q)-S2 Setback from a site boundary General Rural Zone Special Purpose Zone – Macra	Support	Supports the setback standard for farm quarries but considers the required distance from neighbouring properties should be reduced as considers it is excessive and limits quarry location options. Further notes that the remaining land is less suitable due to high groundwater and being in the middle of paddocks.	Seeks to amend setback to 20m consistent with the set back from waterways. Seeks to amend as follows: 1.New Farm quarries and new restricted use quarries must not be located within ~~100m~~ 20m of a residential activity on an adjoining site under different ownership from that of the land on which the farm quarry or restricted use quarry is located. 2. On sites adjoining a Residential or Settlement Zone boundary, the setback shall be at least 300m from the boundary for any new quarry, including restricted use quarry and farm quarry.
298.330	Alastair and Carrie Gibson	NOIC – North Otago Irrigation Company Limited	North Otago Irrigation Scheme Designation Unique Identifier NOIC-1 Designation P	Support	No specific reasons given	Retain as notified
298.331	Alastair and Carrie Gibson	SCHED6 – Significant Natural Areas 100-199	SNA-142 Site Earthquakes Maerewhenua Vegetation Description Significance	Oppose	[refer to original submission]	[refer to original submission]
298.332	Alastair and Carrie Gibson	SCHED9 – Schedule of Significant Natural Features	Ref. Significant Natural Feature Description Values and Characteristics	Support	Support for SNF24 as it is well mapped to the cliff feature and avoids improved pasture.[refer to original submission for full reasons]	Retain as notified
299.1	Twin Terraces Ltd & Cayuga Ltd	Strategic Direction	General	Support	Supports Strategic Direction chapter in general, in particular the historical and cultural identity and values, and the rural areas. [Refer to original submission for full reasons]	Retain Strategic direction chapter as notified.

299.2	Twin Terraces Ltd & Cayuga Ltd	Definitions	Agricultural intensification in relation to the Ecosystems and Indigenous Biodiversity c	Oppose	Opposes in part the definition of Agricultural Intensification and seeks to insert a new definition to replace the existing term used in the Sites and Areas of Significance to Māori chapter. [Refer to original submission for full reasons]	Seeks to retain the definition of Agricultural intensification in the Ecosystems and Indigenous Biodiversity Chapter, and add a new definition to replace the existing term used in the Sites and Areas of Significance to Māori chapter. Suggested new definition: ~~Agricultural intensification:~~ High rate irrigation: in relation to the ~~Ecosystems and Indigenous Biodiversity chapter, Natural Features and Landscapes chapter, and the~~ Sites and Areas of Significance to Māori chapter where rock art is identified, means change from non-irrigated primary production (including plantation forestry) to ~~irrigated~~ agricultural production that is irrigated to a depth more than 10mm, or not controlled by a Freshwater Farm Plan on land that is not currently irrigated as of 1st March 2025.~~It also includes any change from irrigated crop and seed production to dairy farming.~~ Consequential changes to SASM-R8 and SASM-P5, NFL-R5. [Refer to original submission for full relief sought]
299.3	Twin Terraces Ltd & Cayuga Ltd	Definitions	Commercial activity NPS means any activity trading in goods, equipment or services. It	Oppose	Opposes in part the definition of Commercial activities. Considers it captures not-for profit and charity trading which is unlikely to be of the scale that will cause significant adverse effects.	Amend the definition as follows: Commercial activities: means any activity trading in goods, equipment or services for profit. It includes any ancillary activity to the commercial activity (for example administrative or head offices).
299.4	Twin Terraces Ltd & Cayuga Ltd	Definitions	Farm building means a building used for the exercise of farming activities and excludes:	Oppose	Opposes in part the definition of Farm building. Considers the term 'primary production activities' should be used consistently in the PDP.	Amend the definition of 'Farm building' as follows: means a building used for the exercise of ~~farming~~ primary production activities and excludes: 1. buildings for the purposes of residential activities, home occupations, intensive indoor primary production and forestry activities; and 2. visitor accommodation and temporary accommodation that is not associated with farming activities or a rural farmstay experience.’
299.5	Twin Terraces Ltd & Cayuga Ltd	Definitions	Farm track An un-sealed private track serving permitted agricultural or forestry activit	Oppose	Opposes in part the definition of 'Farm track'. Considers that the definition of farm track should also include those serving consented activities and that sealed farm tracks offer environmental benefits such as reducing sediment loss and controlling dust. Considers that the term 'primary production activity should be used as there is no definition for ‘agricultural’ activity.	Amend the definition as follows: An un-sealed or sealed private track serving ~~permitted agricultural or forestry~~ primary production activities.
299.6	Twin Terraces Ltd & Cayuga Ltd	Definitions	Hazardous facility means a facility or activity that involves the use, storage or dispos	Oppose	[No specific reason given beyond decision requested - refer to original submission]	Retain definition as notified.

299.7	Twin Terraces Ltd & Cayuga Ltd	Definitions	Heritage professional means a person with a degree or recognised post-graduate qualifica	Amend	Generally supports the definition of Heritage professional for the following reasons: • Specifying a level of qualification and five years experience is consistent with regional council requirements for 'Suitably Qualified Persons.' • The term 'recognised post-graduate qualification' is too vague as it doesn't specify who it is to be recognised by or how they would recognise it. • A post-graduate qualification is high enough level to be inherently recognised and still has to be in a heritage conservation or management field to be consistent with the other parts of the definition.	Amend definition as follows: means a person with a degree or ~~recognised~~ post-graduate qualification in a field related to heritage conservation or management ..
299.8	Twin Terraces Ltd & Cayuga Ltd	Definitions	Identified taoka has the same meaning as in the National Policy Statement on Indigenous	Oppose	Opposes in part the definition of Identified taoka. Considers that there should be a schedule or list of acknowledged or identified taoka as the PDP's use of the term 'taoka' is ambiguous, making it unclear whether references are to identified or acknowledged taoka.	Seeks to add a schedule of identified taoka and acknowledged taoka into the PDP. Remove provisions for taoka until a list is provided and provisions can be submitted on.
299.9	Twin Terraces Ltd & Cayuga Ltd	Definitions	Intensive outdoor primary production means primary production activities involving the	Oppose	Opposes in part the definition of Intensive outdoor primary production. Supports the inclusions and exclusions, however considers that the definition is vague and open to subjective interpretation and that the terms 'regular' and 'substantially provided other than from the site concerned' should be defined.	Amend the definition as follows: Intensive outdoor primary production means primary production activities involving the keeping or rearing of livestock, or commercial aquaculture, where the ~~regular~~ majority feed source for the production of goods is ~~substantially~~ provided other than from the site concerned ... It excludes the following: ... e. Primary production activities when a drought is declared
299.10	Twin Terraces Ltd & Cayuga Ltd	Definitions	Pervious surface means any part of a site which is grassed or planted in trees or shrubs	Oppose	Opposes in part the definition of Pervious surface, as other surfaces may be pervious such as stones or other types of garden.	Amend the definition as follows: Pervious surface means any part of a site which ~~is grassed or planted in trees or shrubs and~~ is capable of absorbing water including soft landscaping, grass and planted trees or shrubs.. It does not include impervious surfaces or any area which: ...

299.11	Twin Terraces Ltd & Cayuga Ltd	Definitions	Potentially high-impact industrial activities means industrial activities that because o	Oppose	Opposes in part the definition of Potentially high-impact industrial activities as this definition appears to capture hunting and home kill which don't have the nature or scale to justify being defined as potentially high impact. It also appears to capture septic tanks which may duplicate existing consent requirements with the regional council. Both are activities required on farm historically and in the future. A consent burden would curtail provision of quality housing and low cost food, including the harvest and processing of animals from the farm and pests caught when hunting. It is beneficial to have more housing provided in our district and requiring two resource consents for one septic tank is not efficient. All farms have means of disposing of small numbers of dead animals whether from the farm or from hunting. This activity is regulated by the regional council with permitted activity criteria to protect the environment and reverse sensitivity and it would be a duplication to include it in the district plan.	Amend the definition as follows: Potentially high impact industrial activities means industrial activities that because of their nature or scale has a greater potential to impact on the receiving environment than other industrial activities and are those listed below: 1. manufacture and processing of chemical fertilisers; 2.commercial and non-pest species meat processing, or ~~any~~ associated processing of meat and meat by-products, or co-products; 3. fish curing, cleaning, treatment, preserving and storage; 4. cement and bulk concrete products manufacture, including cement plants and concrete batching plants (but excluding the pour of wet-mixed concrete as part of construction); 5. hot mix asphalt paving manufacture; 6. glass or fibreglass manufacture; 7. wood pulp manufacture and processing; 8. foundry processes, electroplating works, melting of metals, steel manufacture and galvanising; 9. flax pulping, flock manufacture or teasing of textile materials for any purpose; 10. storage and disposal of sewage, septic tank sludge, or refuse other than at the source; 11. industrial activity involving regular abrasive blasting being carried out outside; 12. commercial composting; 13. the burning of municipal, commercial or industrial wastes, whether by open fire or the use of incinerators, for disposal of waste; 14. open burning of coated or covered metal cable or wire, including metal coated or covered with varnish, lacquers, plastic

						or rubber, or burning out of the residual content of metal containers used for the transport or storage of chemicals; 15. Crematoriums.
299.12	Twin Terraces Ltd & Cayuga Ltd	Definitions	Recreational activity means the use of land and/or buildings for the purpose of active o	Oppose	Opposes in part the definition of Residential activity. This is a circular definition because it uses itself in it's definition.	Amend the definition as follows: Recreational activity: means the use of land and/or buildings for the purpose of active or passive enjoyment of organised sports, ~~recreation~~ or entertainment. Excludes any recreational activity within the meaning of residential activity.
299.13	Twin Terraces Ltd & Cayuga Ltd	Definitions	Regionally significant infrastructure is: strategic land transport network and arterial	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain definition of Regionally significant infrastructure as notified.
299.14	Twin Terraces Ltd & Cayuga Ltd	Definitions	Repair workshop means the mechanical repair and servicing of motor vehicles (includes mo	Oppose	Opposes in part the definition of Repair workshop. This definition currently does not apply to zones outside Local Centre Zone. Were it to apply to other zones once the plan becomes operative it could include farm and residential workshops.	Retain the definition of Repair workshop as proposed [if only relating to Local Centre Zone]. Should it apply to other zones, amend the definition as follows: Repair workshop means the <u>commercial</u> mechanical repair and servicing of motor vehicles (includes motorcycles, caravans, boat motors, trailers) inside a building.
299.15	Twin Terraces Ltd & Cayuga Ltd	Definitions	Sensitive environment area of land contained within any of the following areas: Coa	Oppose	Opposes in part the definition of Sensitive environment as the district plan has no jurisdiction on airspace and the correct term for the height of land above sea level is elevation.	Amend the definition to remove clause 11, or, if the intent is to include land above 900m elevation then amend the definition as follows: Sensitive environment is an area of land contained within any of the following areas: 1. Coastal Protection Overlay 2. Outstanding Natural Landscape 3. Outstanding Natural Feature 4. Significant Natural Area 5. Sites and Areas of Significance to Māori 6. Significant Natural Feature 7. Historic Heritage Item and Heritage Settings

						8. Notable Trees 9. Skink Habitat/Management Area 10. Within 20 metres of a waterbody 11. Above 900 metres in ~~altitude~~ elevation
299.16	Twin Terraces Ltd & Cayuga Ltd	Definitions	Riparian margin means: for land in the General Rural Zone, all landward property adjo	Oppose	Opposes in part the definition of Riparian margin as it is inconsistent with other measures under the RMA which manage similar sediment issues such as the regulations controlling intensive winter grazing which have a 5m buffer.	Amend the definition as follows: Riparian margins means: ~~1. for land in the General Rural Zone,~~ all landward property adjoining and within ~~20~~ 5 metres of the boundary of the bed of a river or lake, or of the edge of a wetland~~; and~~ ~~2. for land outside the General Rural Zone, all landward property adjoining and within 10 metres of the boundary of the bed of a river or lake, or of the edge of a wetland.~~
299.17	Twin Terraces Ltd & Cayuga Ltd	Definitions	Temporary activity means activities and their ancillary buildings and structures that ar	Support	Supports in part the definition but considers that the undefined term 'helicopter' could be interpreted too broadly and include anything from a drone, gyrocopter through to high impact military helicopters which require support services. Considers that the term 'aircraft' is appropriate to use as it encompasses helicopters, drones, gyrocopters, and fixed-wing aircraft. Seeks to amend the definition to be more consistent with other parts of this plan including the rural general zone and the temporary activities chapter.	Seeks to amend clause (6) as follows: 6. temporary ~~helicopter~~ aircraft take-offs and landings; and
299.18	Twin Terraces Ltd & Cayuga Ltd	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Opposes in part the definition of Vegetation clearance for the following reasons [Refer to original submission for full reasons]: • The term “chemical” is too broad; beneficial substances may be captured unnecessarily. • Requirements relating to hydrological balance are impractical due to lack of baseline information. • Several listed activities can occur naturally or accidentally and should not be classed as vegetation clearance. • The reference to dryland cushionfield species is unclear. • Including mob-stocking is inconsistent with grazing being excluded, and the term is undefined. • Established farming practice is not defined, creating uncertainty. • Wetlands are not defined in the district plan despite being regionally mapped.	Amend the definition to: • Clarify or remove the reference to dryland cushionfield species. • Remove or clearly define mob-stocking, or replace with pugging. • Define established farming practice as ‘primary production activities established before 1st March 2025’. Suggested amendment as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation established as at 1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate:

					• Overly restrictive rules may discourage indigenous planting and create economic disincentives. • Some non-threatened indigenous species (e.g., manuka) provide useful community resources such as firewood.	1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of chemicals including herbicide; 7. burning; 8.~~the deliberate~~application of water, fertiliser or oversowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion~~, including dryland cushionfield species;~~ 9.~~the~~drainage of<u>mapped</u>wetlands or lakes; ~~10. mob-stocking; and~~ 11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site~~; b. walking; c. sampling or undertaking studies; d. natural hazards. <u>e. non-commercial harvesting of firewood</u> [Refer to original submission for full relief sought]
299.19	Twin Terraces Ltd & Cayuga Ltd	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried. Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term	Amend as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious

					'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	stones, ~~industrial rocks and building stones,~~ and a prescribed substance within the meaning of the Atomic Energy Act 1945
299.20	Twin Terraces Ltd & Cayuga Ltd	Mana whenua	General	Support	Supports in part [Refer to original submission for full reasons]	Retain chapter as notified.
299.21	Twin Terraces Ltd & Cayuga Ltd	Mana whenua	Consultation with mana whenua	Support	Supports in part. Support is expressed for clearly identifying when mana whenua may be affected by a proposal. Considers that where iwi consultation is encouraged, costs should be recoverable and that for matters of national importance (including mana whenua, historic heritage, natural features, ecosystems, and natural hazard), costs should be publicly funded, not charged to individual applicants. Considers that specifying applicant fees is outside the scope of the PDP and that consultation processes should be guided by memorandums of understanding or similar, as recommended in the SASM Section 32 report.	Seeks to remove reference to applicants being charged fees for consultation and for a memorandum of understanding to be consulted on prior to further submissions. Amendment sought: The Plan aims to identify where mana whenua may be affected by a proposal. If this is the case, applicants for resource consent are encouraged to contact Aukaha prior to lodging their application. Aukaha can then advise whether consultation with rūnaka is required. Where consultation is required, work is done on a cost-recovery basis. ~~and applicants may be charged a fee.~~ Aukaha sends a summary and recommendation for each resource consent application to the rūnaka that are kaitiaki of the area the application is located in. As there are many areas of shared interest, details of the application may be sent to more than one rūnaka. Feedback regarding the rūnaka position on the application is then sent to the applicant.
299.22	Twin Terraces Ltd & Cayuga Ltd	Natural Hazards	NH-O1 Natural hazard risk The risks from natural hazards, including the effects of climate	Support	Supports NH-O1 with modifications to include proportionality of the avoidance and mitigation to the level of risk.	Amend NH-O1 as follows: The impact on people, property and the environment from the risks of natural hazards and the effects of climate change are recognised, avoided or mitigated relative to the level of risk.
299.23	Twin Terraces Ltd & Cayuga Ltd	Natural Hazards	NH-P1 Identification of natural hazard areas As information becomes available, identify an	Support	Supports in part NH-P1 with modification to better focus the policy given the stringent provisions in natural hazard overlays.	Amend as follows: As information becomes available, identify and map land that ~~may~~ is known to be subject to natural hazards, including taking into account the effects of climate change.
299.24	Twin Terraces Ltd & Cayuga Ltd	Natural Hazards	NH-P2 Risk based approach Avoid subdivision, use and development in areas where natural	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain NH-P2 as notified.
299.25	Twin Terraces Ltd & Cayuga Ltd	Natural Hazards	NH-P3 Critical facilities and regionally significant infrastructure Avoid locating critica	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain NH-P3 as notified.

299.26	Twin Terraces Ltd & Cayuga Ltd	Natural Hazards	NH-P4 Natural protection features Encourage the use, protection, maintenance and enhanc	Support	Supports in part with recommendation to widen scope to specifically require engineering solutions where natural protection features are not appropriate, such as where protection of infrastructure, people and property may require a more certain method.	Amend NH-P4 as follows: Encourage the use, protection, maintenance and enhancement of natural features, buffers and systems, such as wetlands and vegetation, which provide protection from natural hazard risk where engineering solutions are not required to mitigate risk to people, property and infrastructure.
299.27	Twin Terraces Ltd & Cayuga Ltd	Natural Hazards	NH-P13 Other natural hazard awareness overlays Encourage proposals for subdivision, use an	Support	Supports in part NH-P13 with modifications. Considers an assessment should not be required in all cases, especially when there's no evidence that a specific use is at risk from an awareness overlay. Considers there is no clear definition of what constitutes an 'acceptable level' of risk and who determines it.	Amend NH-P13 as follows: Encourage proposals for subdivision, ~~use~~ and development in a natural hazard awareness overlay to undertake an assessment of natural hazard risk and incorporate any methods to reduce or mitigate the risk ~~to an acceptable level~~. Alternatively, if 'use' is to remain, seeks to amend NH-P13 as follows: Encourage proposals for subdivision, use and development in a natural hazard awareness overlay to ~~undertake an assessment~~ consider the effects of natural hazard risk and incorporate methods to reduce or mitigate the risk ~~to an acceptable level~~.
299.28	Twin Terraces Ltd & Cayuga Ltd	Natural Hazards	NH-R1 Buildings, structures and fences in the Otago Flood Assessment Overlay All zones	Oppose	Opposes in part NH-R1 with modifications. Considers the rule should acknowledge that other farm structures, like poles or irrigation infrastructure, are not more flood-prone or hazardous than those already listed, and may even mitigate risk. Considers the term 'suitably qualified and experienced professional' should be clarified. [Refer to original submission for full reasons]	Amend NH-R1 as follows: PER-1 The building or structure is: 1. a below ground swimming pool; or 2. a deck; or 3. an unenclosed building without a floor or with a concrete floor; or 4. a post and wire or post and rail fence; or 5. a farm building in a Rural Zone that has an unsealed, concrete or pervious floor; or 6. a pole; or 7. Irrigation or stockwater infrastructure Seeks clarification on the term 'suitably qualified and experienced professional'.
299.29	Twin Terraces Ltd & Cayuga Ltd	Natural Hazards	NH-R2 Buildings, structures and fences in the Canterbury Flood Assessment Overlay All z	Oppose	Opposes in part NH-R2. Considers the rule should acknowledge that other farm structures, like poles or irrigation infrastructure, are not more flood-prone or hazardous than those already listed, and may even mitigate risk. [Refer to original submission for full reasons]	Seeks to add provision for other floors in buildings and structures like poles and water infrastructure.

299.30	Twin Terraces Ltd & Cayuga Ltd	Natural Hazards	NH-R4 Earthworks excluding land disturbance in all Flood Assessment Overlays All zones	Support	Supports in part NH-R4 with modification to permit the building of tracks.	Amend NH-R4 as follows: PER-2 The earthworks relate to the maintenance, repair, replacement and upgrade of natural hazard mitigation works permitted under NH-R5; or PER-3 The earthworks are for the construction of a farm track.
299.31	Twin Terraces Ltd & Cayuga Ltd	Natural Hazards	NH-R6 Land use activities in the Canterbury Flood Assessment Overlay, the Otago Flood Assessme	Support	Supports in part NH-R6 with modification to add other uses which are compatible with the objectives and policies of the Natural Hazards chapter such as airstrips and helicopter take off and landing areas.	Amend NH-R6 as follows: PER-1 The activity is one of the following: 1. primary production; 2. recreation or leisure activity including sports fields; 3. temporary events; 4. parking and loading areas at ground level or above 5. Aeroplane airstrips and helicopter take off and landing areas.
299.32	Twin Terraces Ltd & Cayuga Ltd	Natural Hazards	NH-P5 Site specific assessment/investigation A risk assessment will be required for subdiv	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain NH-P5 as notified.
299.33	Twin Terraces Ltd & Cayuga Ltd	Natural Hazards	NH-P6 Canterbury Flood Assessment Overlay Except as provided for in NH-P3, avoid subdiv	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain NH-P6 as notified.
299.34	Twin Terraces Ltd & Cayuga Ltd	Natural Hazards	NH-P7 Otago Flood Assessment Overlay and Waitaki River Floodplain Assessment Overlay Ex	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain NH-P7 as notified.
299.35	Twin Terraces Ltd & Cayuga Ltd	Natural Hazards	NH-P11 Liquefaction Assessment Overlay Provide for subdivision in the Liquefaction Assessm	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain NH-P11 as notified.
299.36	Twin Terraces Ltd & Cayuga Ltd	Natural Hazards	NH-P12 Wildfire – subdivision and land use Ensure that subdivision and land use in area	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain NH-P12 as notified.
299.37	Twin Terraces Ltd & Cayuga Ltd	Natural Hazards	NH-R3 Buildings, structures and fences in the Waitaki River Floodplain Assessment Overlay	Oppose	Opposes in part NH-R3. Considers the rule should acknowledge that other farm structures, like poles or irrigation infrastructure, are not more flood-prone or hazardous than those already listed, and may even mitigate risk. Considers the term 'suitably qualified and experienced professional' should be clarified. [Refer to original submission for full reasons]	Seeks to add provision for other floors in buildings and structures like poles and water infrastructure.

299.38	Twin Terraces Ltd & Cayuga Ltd	Natural Hazards	NH-R13 Wildfire – woodlots, shelterbelts, plantation forestry and buildings All zones	Amend	Supports in part NH-R13 with modification to encourage the planting of low flammability plants, particularly near houses.	Amend NH-R13 as follows: PER-4 The woodlot , shelterbelt or plantation forestry is a species listed in the FENZ Low Flammability Plant Directory. ... Where: RDIS-1 Compliance is not achieved with PER-1, PER-2 PER-3 and/or ~~PER-3~~ PER-4
299.39	Twin Terraces Ltd & Cayuga Ltd	Hazardous Substances	General	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain Hazardous Substances chapter and definitions as notified.
299.40	Twin Terraces Ltd & Cayuga Ltd	Historic Heritage	HH-O1 Protection of historic heritage The District's historic heritage is recognised, main	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain HH-O1 as notified.
299.41	Twin Terraces Ltd & Cayuga Ltd	Historic Heritage	HH-O2 Use and adaptive re-use of historic heritage Historic Heritage Items and their herit	Support	Supports HH-O2 noting that primary production is sympathetic re-use of the heritage settings where existing.	Retain HH-O2 as notified.
299.42	Twin Terraces Ltd & Cayuga Ltd	Historic Heritage	HH-P1 Recognise historic heritage Identify Historic Heritage Items and their associated	Support	Supports HH-P1 with recommendation to recognise landowners' interests and consent in heritage protection. Considers heritage protection to be more effective when landowners are constructively engaged and permission is required for listing. [Refer to original submission for full reasons]	Amend HH-P1 as follows: With landowner permission, ~~i~~identify Historic Heritage Items and their associated heritage settings throughout the Waitaki district that warrant protection in SCHED2 – Historic Heritage Items, and are significant in terms of one or more of the following values: ...
299.43	Twin Terraces Ltd & Cayuga Ltd	Historic Heritage	HH-P2 Historic heritage scheduling Classify Historic Heritage Items and their associate	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain HH-P2 as notified.
299.44	Twin Terraces Ltd & Cayuga Ltd	Historic Heritage	HH-P3 Benefits of active use, adaptive re-use, and protection of historic heritage Recogni	Support	Supports HH-P3 in the context of re-use of primary production.	Retain HH-P3 as notified.
299.45	Twin Terraces Ltd & Cayuga Ltd	Historic Heritage	HH-P4 Heritage maintenance Enable the use and heritage maintenance of the Historic Heri	Support	Supports HH-P4 in the context of re-use of primary production.	Retain HH-P4 as notified
299.46	Twin Terraces Ltd & Cayuga Ltd	Historic Heritage	HH-P5 Modern service attachments Enable attachments to Historic Heritage Items included	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain HH-P5 as notified.

299.47	Twin Terraces Ltd & Cayuga Ltd	Historic Heritage	HH-P6 Heritage restoration Control the heritage restoration of Historic Heritage Items	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain HH-P6 as notified.
299.48	Twin Terraces Ltd & Cayuga Ltd	Historic Heritage	HH-P7 Retaining historic heritage – earthquake and flooding resiliency Encourage earthquak	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain HH-P7 as notified.
299.49	Twin Terraces Ltd & Cayuga Ltd	Historic Heritage	HH-P8 Protecting historic heritage from inappropriate heritage alterations Provide for	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain HH-P8 as notified.
299.50	Twin Terraces Ltd & Cayuga Ltd	Historic Heritage	HH-P9 Relocation of Historic Heritage Items within or beyond their heritage setting Allow	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain HH-P9 as notified.
299.51	Twin Terraces Ltd & Cayuga Ltd	Historic Heritage	HH-P10 Demolition or destruction of Category B Historic Heritage Items Only allow the d	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain HH-P10 as notified.
299.52	Twin Terraces Ltd & Cayuga Ltd	Historic Heritage	HH-P11 Demolition or destruction of Category A Historic Heritage Items Avoid the demolitio	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain HH-P11 as notified.
299.53	Twin Terraces Ltd & Cayuga Ltd	Historic Heritage	HH-P12 Buildings and structures within heritage settings Only allow new buildings and s	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain HH-P12 as notified.
299.54	Twin Terraces Ltd & Cayuga Ltd	Historic Heritage	HH-P13 Subdivision of sites containing Historic Heritage Items Only allow subdivision o	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain HH-P13 as notified.
299.55	Twin Terraces Ltd & Cayuga Ltd	Historic Heritage	HH-P14 Planning incentives to encourage the sustainable use of Historic Heritage Items Ass	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain HH-P14 as notified.
299.56	Twin Terraces Ltd & Cayuga Ltd	Historic Heritage	HH-P15 Future consideration of historic heritage Council continues to investigate the iden	Oppose	Opposes HH-P15. Considers this to be a council matter, not a planning matter as future councils may have different priorities and should not be bound by past policies or required to undertake a plan change between cycles.	Seeks to delete HH-P15.
299.57	Twin Terraces Ltd & Cayuga Ltd	Historic Heritage	HH-R1 Heritage maintenance on Historic Heritage Items listed in SCHED2 – Historic Heritage Ite	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain HH-R1 as notified.

299.58	Twin Terraces Ltd & Cayuga Ltd	Historic Heritage	HH-R2 Animal grazing on sites and their heritage setting identified in SCHED2 – Historic Herit	Support	Supports HH-R2 as notified permitting the grazing and maintenance of various items in the context of a working farm.	Retain HH-R2 as notified.
299.59	Twin Terraces Ltd & Cayuga Ltd	Historic Heritage	HH-R3 Earthworks within the heritage setting of a Historic Heritage Item listed in SCHED2 – Hi	Support	Supports HH-R3 as notified permitting the grazing and maintenance of various items in the context of a working farm.	Retain HH-R3 as notified.
299.60	Twin Terraces Ltd & Cayuga Ltd	Historic Heritage	HH-R5 New buildings, structures and signs, or alterations to an existing building or structure	Support	Supports HH-P5 in part with suggested modifications to reflect the practical needs of heritage items located in a rural contexts where structures like fences and pipes are necessary for primary production. [Refer to original submission for full reasons]	Amend HH-R5 to add a list of exclusions for some low impact structures that could be anticipated to be installed in a rural heritage setting but without permitting buildings. PER 1 Any new building, structure or sign is: 1. temporary; and 2. associated with a temporary activity; and 3. is not attached to a heritage structure; and 4. is within the heritage setting no longer than 14 calendar days per year; or 5. is a post and wire or post and rail fence; or 6. is irrigation or stock water infrastructure; or
299.61	Twin Terraces Ltd & Cayuga Ltd	Historic Heritage	HH-R12 Relocation of a Category B Historic Heritage Item listed in SCHED2 – Historic Heritage	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain HH-R12 as notified.
299.62	Twin Terraces Ltd & Cayuga Ltd	Historic Heritage	HH-R13 Relocation of a Category A Historic Heritage Item listed in SCHED2 – Historic Heritage	Oppose	Opposes HH-R13. Considers that the relocation of heritage items can sometimes improve their condition or address health and safety risks (for example the Herbert War Memorial) and that making consent too difficult may increase the risk of demolition by neglect. [Refer to original submission for full reasons]	Seeks to amend HH-R13 to a discretionary activity.
299.63	Twin Terraces Ltd & Cayuga Ltd	Historic Heritage	HH-R14 Any demolition of a Historic Heritage Item listed in SCHED2 – Historic Heritage Items	Oppose	Opposes HH-M1. Considers this to be a council matter, not a planning matter as future councils may have different priorities and should not be bound by past policies or required to undertake a plan change between cycles.	Seeks to delete HH-M1
299.64	Twin Terraces Ltd & Cayuga Ltd	Historic Heritage	HH-R14 Any demolition of a Historic Heritage Item listed in SCHED2 – Historic Heritage Items	Support	Supports the intent of HH-M4 but considers this to be a council matter rather than a planning matter. [Refer to original submission for full reasons]	Seeks to delete HH-M4.
299.65	Twin Terraces Ltd & Cayuga Ltd	Notable Trees	General	Support	Supports the Notable Trees chapter in general.	Retain Notable Trees chapter as notified.

299.66	Twin Terraces Ltd & Cayuga Ltd	Notable Trees	TREE-P5 Other trimming and pruning of Notable Trees Provide for any other trimming of N	Support	Supports in part TREE-P5 with modifications as it is not possible to confirm long-term impacts of trimming on tree health or lifespan in advance. Considers 'likelihood' is a more practical measure than certainty. Also considers that trimming may alter a tree's natural form, especially when removing diseased or hazardous limbs and that TREE-S1 should also be considered regarding the retention of natural form.	Amend TREE-P5 as follows: Provide for any other trimming of Notable Trees where it can be demonstrated that the works do not: 1. likely compromise the long-term health of the Notable Tree; 2. compromise the identified values of the Notable Tree, listed in SCHED4 - Notable Trees; 3. likely reduce the natural life of the Notable Tree; 4. increase the risk of the Notable Tree being subject to wind damage; and 5. impact the natural shape and form of the Notable Tree more than necessary.
299.67	Twin Terraces Ltd & Cayuga Ltd	Notable Trees	TREE-S1 Trimming of Notable Trees All zones The maximum branch diameter being trimm	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain TREE-S1 as notified.
299.68	Twin Terraces Ltd & Cayuga Ltd	Notable Trees	TREE-S2 Trimming or removal of Notable Trees posing a threat to people or property All	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain TREE-S2 as notified.
299.69	Twin Terraces Ltd & Cayuga Ltd	Notable Trees	TREE-S3 Trimming or removal of Notable Trees All zones The works are undertaken or	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain TREE-S3 as notified.
299.70	Twin Terraces Ltd & Cayuga Ltd	Notable Trees	TREE-R1 Maintenance of the ground within the root protection area of a Notable Tree All	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain TREE-R1 as notified.
299.71	Twin Terraces Ltd & Cayuga Ltd	Notable Trees	TREE-R2 Trimming or pruning of a Notable Tree All zones Activity status: Permitted	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain TREE-R2 as notified.
299.72	Twin Terraces Ltd & Cayuga Ltd	Notable Trees	TREE-R3 Removal of a Notable Tree All zones Activity status: Permitted Where: PER-1	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain TREE-R3 as notified.
299.73	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	General	Oppose	Opposes in part the SASM chapter. [Refer to original submission for full reasons]	[Refer to original submission for relief sought]
299.74	Twin Terraces Ltd & Cayuga Ltd	SCHED5 – Schedule of Sites and Areas of Significance to Maori	ID ref Name Description and Values SASM007 Waitaki River The nam	Oppose	Opposes in part Schedule 5. The property is encumbered with the following SASM overlay: SASM 007. Considers that not all the rules in the SASM chapter should apply to all SASMs, only to those where the relevant values are still present. The agricultural intensification rules should not apply unless identified rock art is	Seeks to amend the boundaries of SASM 007, and to only apply specific provisions to this SASM. Submits that landowners and iwi

					located on a limestone escarpment where it may be subject to a change in water balance. Water balance above limestone escarpments is not relevant where rock art is not located on the escarpment, but is on individual rocks instead. Where non-physical values still exist there is no need to regulate all of the activities covered by the SASM rules as earthworks, irrigation, dairy farming. [Refer to original submission for full reasons]	should be consulted to determine which rules apply to which SASMs across the rest of the district. [Refer to original submission for full relief sought]
299.75	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	General	Oppose	Opposes in part SASM-R3, SASM-R4 and SASM-R8. Considers that Freshwater Farm Plans are set to become the primary planning tool for farmland and aim to streamline consent processes by managing farming effects within a single plan under the RMA, and these may also incorporate SASM values. Considers that Freshwater Farm Plans retain a level playing field because the landowner is obligated to have it certified to carry out activities, while the iwi are obligated to consult with the landowner to advise on protection of their significant sites. Both obligations require good faith and genuine relationships rather than expensive consent burdens involving the district council. [Refer to original submission for full reasons]	Seeks to reduce consent burdens on farmers and allow them to plan directly with iwi in good faith through Freshwater Farm Plans. Seeks to include permitted activity pathways within SASM-R3, SASM-R4 and SASM-R8 to manage freshwater through Freshwater Farm Plans. [Refer to original submission for full relief sought]
299.76	Twin Terraces Ltd & Cayuga Ltd	Mana whenua	General	Oppose	Opposes in part the Mana Whenua chapter. Considers there to be a conflict of interest as the plan states that Aukaha helped draft the provisions and will also charge for consultation on them. Considers there needs to be a clear separation between plan-making and implementation. [Refer to original submission for full reasons]	Seeks that the management of SASMs be enabled as a permitted activity for farms with a certified Freshwater Farm Plan (FWFP) that include a chapter on SASM management. Alternatively, consultation could be provided by a Suitably Qualified Person (SQP) with relevant qualifications and experience, promoting a competitive market and reducing workload for iwi. [Refer to original submission for full relief sought]
299.77	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	General	Oppose	Opposes in part the Sites and Areas of Significance to Maori, Natural Features and Landscapes, Natural Character and Ecosystems and Biodiversity chapters. Considers the uncertainty of time and cost associated with consenting, particularly under the SASM provisions should be supported by a service level agreement. Considers that some issues are better addressed through RMA reform and that many Significant Natural Areas and Natural Features and Landscapes appear to have been mapped without proper landowner engagement. [Refer to original submission for full reasons]	Seeks for the withdrawal of the Sites and Areas of Significance to Māori, Natural Features and Landscapes, Natural Character and Ecosystems and Biodiversity chapters until the RMA reform is complete and an MOU is in place with Aukaha detailing time and cost of consultation.
299.78	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-O1 Rakatirataka and kaitiakitaka The rakatirataka of mana whenua over their signif	Amend	Supports the intent of SASM-O1 with modification to clarify that the objective is not intended to be in isolation from the landowner. Considers that that the exercise of kaitiakitaka can't be implemented without agreement from the land owners who have	Amend SASM-O1 as follows:

					their own rights and responsibilities within their own relationship with the land.	The rakatirataka of mana whenua over their significant sites and areas is recognised and they are able to exercise kaitiakitaka within these areas with agreement from the landowners.
299.79	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-O2 Protection of wāhi tūpuna values The relationship of mana whenua with wāhi tūpuna	Support	Supports SASM-O2 particularly the goal of increasing community awareness of wāhi tūpuna values. Considers that landowners have historically maintained relationships with these sites without needing district plan provisions and that regulation is not necessary to sustain mana whenua connections.	Seeks that the values for protection need to be identified in the PDP.
299.80	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-O3 Preservation of tuhituhi neherā The integrity of tuhituhi neherā sites is prese	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain SASM-O3 as notified.
299.81	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-O4 Enhancement of mahika kai Mahika kai values are enhanced to support customary use.	Support	Supports SASM-O4 in part. Considers it important that mahika kai values are maintained and where appropriate these values enhanced, as it may not always be possible to enhance.	Amend SASM-O4 as follows: Mahika kai values are maintained or, enhanced where appropriate to support customary use.
299.82	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-O5 Access and use for customary purposes Mana whenua are able to access wāhi tūpuna f	Oppose	Opposes in part SASM-O5. Considers the objective requires clarification that it does not imply a general right of access to wāhi tūpuna and that access should be with landowner permission. Considers the Trespass Act is impractical for managing access and may strain iwi–landowner relationships. [Refer to original submission for full reasons]	Amend SASM-O5 as follows: Mana whenua are able to access, where appropriate, wāhi tūpuna for customary purposes and are able to use mahika kai resources in accordance with tikaka and with landowner agreement.
299.83	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-P1 Identification of wāhi tūpuna Working with mana whenua, identify, on Planning m	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain SASM-P1 as notified.
299.84	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-P2 Mana whenua involvement in resource management processes Provide for the invol	Oppose	Opposes in part SASM-P2. Considers the policy should clarify whether rules apply only where wāhi tūpuna values remain, or even where they've been physically altered but still hold cultural significance. Considers that consultation for all activities within or near wāhi tūpuna areas places a significant burden on landowners and mana whenua and the policy should be more targeted, directing consultation and notification to situations where it would meaningfully support the protection or enhancement of wāhi tūpuna values.	Seeks to amend the SASM overlay to map only where the values are known to still exist. If the maps cannot be changed, seeks to amend SASM-P2 as follows: Provide for the involvement of mana whenua in resource management processes affecting identified wāhi tūpuna by encouraging consultation and engagement with mana whenua prior to undertaking activities which will have an adverse effect on the maintenance or enhancement of ~~or applying for resource consent within or adjoining~~ identified wāhi tūpuna.
299.85	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-P3 Management of wāhi tūpuna Only allow or provide for land use and development in id	Support	Considers that the protection of exiting uses should be explicitly provided for in SASM-P3.	Amend SASM-P3 as follows: ~~Only allow or provide for~~ Ensure new land use and development in identified wāhi tūpuna ~~where it~~ avoids significant adverse effects, and avoids, remedies or mitigates other adverse effects, on

						the remaining values associated with these areas, having particular regard to: ...
299.86	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-P4 Obstruction of mauka, tuhituhi neherā and wai māori by structures Avoid the loc	Support	Supports in part SASM-P4, where the locations of mauka, tuhituhi neherā and wai māori are clearly identified as holding these values. It is important that these values are accurately identified within the District plan maps so that is clearly understood where structures are to be avoided. Considers provision should also be made for compatible structures that support land uses enhancing wāhi tūpuna values, and the policy should explicitly protect existing uses while avoiding vague terms like "or near."	Amend SASM-P4 as follows: Avoid the location of new structures in riparian margins, on ~~or near~~ limestone outcrops, on upper slopes and on ~~or near~~ ridgelines unless: 1. they do not obstruct views to and across culturally significant waterbodies, tuhituhi neherā or mauka; and 2. ~~they avoid adverse effects on the~~ the structure can maintain or enhance the wāhi tūpuna values of these areas.
299.87	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-P5 Protection of integrity of tuhituhi neherā Avoid the following activities on, o	Oppose	Opposes in part SASM-P5. Concerns with the assumptions in irrigation modelling used to assess impacts and considers evidence suggests water loss may be overestimated and low-rate irrigation can avoid adverse effects. Considers that while the intent to protect tuhituhi neherā is supported, the policy should acknowledge that some existing agricultural and forestry activities have been compatible with these values and may continue to be so.	Seeks to permit and encourage low rate irrigation and discourage high rate irrigation [refer to original submission]. Also seeks for the protection of existing uses to be explicitly provided for in SASM-P4. Seeks to amend SASM-P5 as follows: Avoid the following new activities on areas mapped as, ~~or in close proximity to~~, limestone outcrops; 1.~~agricultural intensification~~ high rate irrigation; and 2. plantation forestry, unless any adverse effects on the integrity of tuhituhi neherā from disturbance of land and vegetation and changes in the water table, soil water environment and air moisture are avoided.
299.88	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-P6 Culturally incompatible activities Avoid degradation of the values of wāhi tūpu	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain SASM-P6 as notified.
299.89	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-P7 Habitat restoration and enhancement Encourage restoration and enhancement of indig	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain SASM-P7 as notified.
299.90	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-P8 Mahika kai activities Enable mana whenua to undertake mahika kai activities in ide	Support	Supports in part SASM-P8 with modification as the PDP does not grant general access rights or transfer ownership of mahika kai resources, and the current user notes lack legal standing and clarity on ownership. Considers the policy should be reworded to more accurately reflect how the objective will be achieved while fostering respectful relationships between landowners and iwi.	Seeks that the PDP should clarify that land owner permission is required to undertake mahika kai. Also seeks to amend SASM-P8 as follows: Enable mana whenua to undertake mahika kai activities in identified wāhi tūpuna, in accordance with tikaka and with landowner agreement.

299.91	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-P9 Access for customary purposes Maintain existing access opportunities and encourage	Support	Supports in part SASM-P9 with modification to clarify that it does not create a general right of access to wāhi tūpuna on private land and that access should remain subject to landowner permission. Considers the policy should be reworded to reflect existing legal frameworks and practical considerations, ensuring respectful relationships and sustainable resource management. [Refer to original submission for full reasons]	Amend SASM-P9 as follows: Maintain existing access opportunities and encourage enhancement of access, where appropriate, for mana whenua to identified wāhi tūpuna for customary purposes with landowner agreement.
299.92	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-P10 Wilding conifer species Protect wāhi tūpuna from modification by wilding conifer	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain SASM-P10 as notified.
299.93	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-R1 Mahika kai activities within a wāhi tūpuna identified in SCHED5 – Sites and Areas of S	Support	Supports SASM-R1 with modifications to clarify that it does not create a general right of access on private land and that access should remain subject to landowner permission.	Amend SASM-R1 as follows: Activity status: Permitted Where: PER-1: An agreement is reached with the landowner permitting access and use of resources. Activity status when compliance is not achieved: ~~Not Applicable~~ Prohibited Note: The provisions in this rule do not override the provisions of the Trespass Act 1980. There is no general right of public access across private land or right to use private resources.
299.94	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-R2 Buildings and structures within a wāhi tūpuna identified in SCHED5 - Sites and Areas o	Oppose	Opposes in part SASM-R2, as the 200m^2 threshold lacks justification and may unnecessarily increase consent requirements, while compatible structures that support wāhi tūpuna values should be distinguished. A 6m height limit for buildings and 25m for structures such as silos is supported, and low-rate irrigation infrastructure should be permitted within 100m of limestone cliffs to avoid unintended environmental impacts. The rule should clarify restricted discretionary matters, avoid unnecessary expert assessments, and ensure access, alternatives, and enhancement requirements are practical and proportionate. [Refer to original submission for full reasons]	Amend SASM-R2 as follows: Activity status: Permitted Where: PER-1 The building or structure has a maximum building footprint of ~~200~~350m2; and PER-2 The building ~~or structure~~ has a maximum height of 6m as measured from the existing natural ground level; and PER-3 The structure has a maximum height of 25m; and

						~~PER-3~~ PER-4 The building or structure is not located within 20m of a waterbody or 50m of a wetland (excluding farm buildings or farm structures less than 10m^2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating); and ~~PER-4~~ PER-5 The building or structure is not located on, or within, 100m of a limestone escarpment (excluding farm buildings or farm structures less than 10m^2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating); and ~~PER-5~~ PER-6 The building or structure is not located on or within 20m vertical distance of a ridgeline (excluding farm buildings or farm structures less than 10m^2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating); and ~~PER-6~~ PER-7 The building or structure is located at an elevation less than 900m above sea level (excluding farm buildings or farm structures less than 10m2 with a maximum height of 2m above the natural ground level, or post and wire, post and rail fence or farm-style gating). ... Matters of discretion are restricted to: 1. whether the relevant rūnaka has been consulted, the outcome of that consultation, and the extent to which the proposal responds to, or incorporates the outcomes of that consultation; and 2. the ~~potential~~ adverse effects on the values of the wāhi tūpuna, and the relationship of mana whenua with the area, including: a. loss of wāhi tūpuna associations through modification of the landscape and natural processes; and ~~b. damage to the integrity of wāhi tūpuna through disturbance of land and/or indigenous vegetation; and~~ c. disturbance of wāhi tapu and archaeological sites; and

						d. adverse effects on the ~~integrity~~ preservation of tuhituhi neherā sites ~~including through disruption of the landform or water balance in the area~~; and e. adverse effects on the mauri of waterbodies; and f. reduction in the extent and quality of mahika kai; and ~~g. loss of access to mahika kai for customary activities; and~~ 3. effects on sites where there is the potential for kōiwi or artefacts to be found, including consideration of the need to impose an accidental discovery protocol or have a cultural monitor present; and ~~4. whether there are alternative methods, locations or designs that would avoid or reduce the impact on the values associated with wāhi tūpuna; and~~ ~~5. the appropriateness of any mitigation measures, including monitoring, planting or improved access for customary use; and~~ ~~6. whether the proposal provides an opportunity to recognise mana whenua culture, history and identity associated with the wāhi tūpuna, and any potential to:~~ ~~a. affirm the connection between mana whenua and the wāhi tūpuna; or~~ ~~b. enhance the cultural values of the wāhi tūpuna~~ Activity status when compliance is not achieved: ~~Non-Complying~~ Discretionary Where: ~~NC-1~~ DIS-1 Compliance is not achieved with PER-3, PER-5 and/or PER-6 Notification: Any application made under RDIS-1 and/or NC-1 may be notified to Te Rūnanga o Moeraki
299.95	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-R3 Indigenous vegetation clearance within a wāhi tūpuna, identified in SCHED5 - Sites and	Support	Supports SASM-R3 with modification to prevent landowners from being discouraged from planting new indigenous vegetation, and to allow a permitted pathway for indigenous vegetation removal where landowners have certified Freshwater Farm Plans.	Amend SASM-R3 as follows:

						PER-1 ... k. improved pasture ... PER-3 The indigenous vegetation clearance is part of the understory of a plantation forest and is incidental to permitted or otherwise authorised plantation forest harvesting; or PER-4 The indigenous vegetation was planted after 1st March 2025 and complies with a certified Freshwater Farm Plan.
299.96	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-R4 Earthworks within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significanc	Oppose	Opposes in part SASM-R4 as it excludes earthworks for permitted building platforms and would create unnecessary consent requirements for routine activities, especially where SASM overlays cover farm bases and improved pasture with no archaeological value. The submitter suggests either removing SASM overlays from such areas or modifying the rule to increase earthworks thresholds (e.g., to 3m cut and 1,000m^2 area), manage effects through permitted activity criteria, and use boundary setbacks in residential settings, thereby reducing the consent burden while still protecting genuinely sensitive sites. The submitter also considers there is unnecessary duplication with earthworks chapter rules and SASM-R3 requirements. [Refer to original submission for full reasons]	Seeks the following [Refer to original submission for full relief sought]: • Retain the rule as proposed if the overlay can be removed from improved pasture, residential curtilage and residential zones. • If the overlay cannot be removed as above, then change earthworks standards as follows to permit a 3m cut and 1,000m^2 area in all zones by using setbacks and permitted activity criteria to manage the effects identified in the matters for discretion. Requested change to SASM-R4: Add the following new PERs to SASM-R4 [GRUZ/RLZ/OSZ]: Earthworks (not including land disturbance) within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significance to Māori (excluding mahika kai activities) ... PER-2 The earthworks activity is for conservation activities and does not exceed 25m2 over any 3 year period and all of the following earthworks standards are complied with where relevant: 1. EW-S2 Maximum cut depth and fill; 2. EW-S3 Earthworks on sloping sites; and 3. EW-S4 Earthworks within 20 metres of a waterbody; ~~and~~ or

						PER-3 The permitted activity standards of EW-R1 are complied with; and PER-4 Earthworks are set back 100m from tuhituhi nehera and complies with a certified Freshwater Farm Plan; and PER-5 Earthworks are set back 20m from mahika kai resources; and PER-6 Access to mahika kai resources is not obstructed; and ~~PER-3~~ PER-7 All bare areas are re-vegetated or finished within 6 months of the earthworks being undertaken; or ~~PER-4~~ PER-8 The permitted activity standards of EW-R6 Earthworks and land disturbance within the National Grid Yard are met (if applicable); or PER-9 The earthworks are associated with any permitted activity under SASM-R2. ... [GRZ/SETZ] Where: ~~PER-5~~ PER-10 All earthworks where they comply with the following earthworks standards where relevant: 1. EW-S1 Threshold areas [submitting change to 1,000m]. 2. EW-S2 Maximum cut depth and fill height [submitting change to 3m cut and fill depth]; and 3. EW-S4 Earthworks within 20 metres of a waterbody
299.97	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-R5 Urupā within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significance to	Support	Supports SASM-R5 where urupā already exist, but submits that where new urupā are established they are treated the same as cemeteries on the basis they have similar environmental effects, while acknowledging their different cultural and spiritual status.	Retain as notified [Inferred relief sought].
299.98	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-R6 Amenity planting and shelterbelts within a wāhi tūpuna, identified in SCHED5 – Sites a	Support	Supports SASM-R6 but considers specific provision to permit existing shelter belts within 100m of limestone escarpments is required.	Amend SASM-R6 as follows:

						Where: PER-1 The new amenity planting or shelterbelt is not located on or within 100m of a limestone escarpment.
299.99	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-R7 Natural hazard mitigation structures within a wāhi tūpuna, identified in SCHED5 - Site	Support	Supports SASM-R7 with modification to allow a permitted pathway for councils or private applicants to create natural hazard structures, provided iwi are consulted to ensure any permitted activity pathway addresses potential effects on cultural values.	Seeks consultation with iwi regarding effects they wish to manage with SASM-R7 and what a permitted activity pathway could be. Also seeks to amend SASM-R7 as follows: Activity status: ~~Restricted Discretionary~~ Permitted PER-1 Fish passage is not impeded. ~~Where:~~ ~~RDIS-1~~ ~~The structures are erected by, or on behalf of, Waitaki District Council, Otago Regional Council, or Canterbury Regional Council.~~ ~~Matters of discretion are restricted to:~~ ~~1. The matters of discretion listed in SASM-R2 RDIS-1.~~ ... Activity status when compliance is not achieved: Discretionary Where: DIS-1 Compliance is not achieved with ~~RDIS-1~~ PER-1 ... Notification: Any application made under ~~this rule~~ DIS-1 may be notified to Te Rūnanga o Moeraki.
299.100	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-R8 Agricultural intensification within a wāhi tūpuna, identified in SCHED5 - Sites and Ar	Oppose	Opposes in part SASM-R8. Considers that irrigation should not be subject to consent requirements in SASMs where there is no mapped rock art. Where irrigation is subject to consent requirements there should be a permitted activity pathway to encourage low rate irrigation. Provisions should specifically protect activities established prior to notification of the proposed plan. [Refer to original submission for full reasons]	Seeks to provide for a permitted activity pathway to encourage low rate irrigation, and suggests a new definition of Agricultural intensification. [Refer to original submission for full relief sought]

299.101	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-R9 Commercial outdoor recreation within a wāhi tūpuna, identified in SCHED5 - Sites and A	Support	Supports SASM-R9 only if the SASM overlay is modified to exclude improved pasture. Otherwise opposes the rule, and considers it unnecessarily restricts landowner diversification where large areas of the property are covered by SASM, leaving no practical area for alternative activities without a resource consent. Considers that iwi oversight is appropriate for identified archaeological sites; however, requiring consent for outdoor recreation in less sensitive parts of the property is not justified. [Refer to original submission for full reasons]	Amend the boundaries of the SASM [inferred relief].
299.102	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-R10 Plantation forestry activities within a wāhi tūpuna, identified in SCHED5 - Sites and	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain SASM-R10 as notified.
299.103	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-R11 Mining activities, farm quarries or quarrying activities within a wāhi tūpuna, identi	Oppose	Opposes SASM-R11 in part. Considers that farm quarries should be excluded from this rule and permitted with appropriate setbacks from sensitive sites, so properties mostly covered by a SASM overlay can still meet operational needs. Considers existing quarries should remain permitted, and the rule could be supported if the overlay mapping is rationalised as submitted. [Refer to original submission for full reasons]	Amend SASM-R11 as follows: SASM-R11 New mining activities, farm quarries or quarrying activities within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significance to Māori Activity status: ~~Discretionary~~ Permitted Where: PER-1 The farm quarry is set back 100m from tuhituhi nehera, waterways, limestone escarpments, archaeological sites and cemeteries or urupa. ~~DIS-1~~ PER-2 Gravel extraction is required for flood mitigation works. ~~undertaken by a regional council.~~ Activity status when compliance is not achieved: Non-complying Where: NC-1 Compliance is not achieved with ~~DIS-1~~ PER-1 or PER-2. Notification: Any application made under NC-1 ~~this rule~~ may be notified to Te Rūnanga o Moeraki.
299.104	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-R12 Cemeteries or crematoria within a wāhi	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain SASM-R12 as notified.

			tūpuna, identified in SCHED5 - Sites and Areas			
299.105	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-R13 Landfills within a wāhi tūpuna, identified in SCHED5 - Sites and Areas of Significanc	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain SASM-R13 as notified.
299.106	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-R14 Wastewater treatment plants within a wāhi tūpuna, identified in SCHED5 - Sites and Ar	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain SASM-R14 as notified.
299.107	Twin Terraces Ltd & Cayuga Ltd	Sites and Areas of Significance to Maori	SASM-R15 Planting wilding conifer species within a wāhi tūpuna, identified in SCHED5 - Sites a	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain SASM-R15 as notified.
299.108	Twin Terraces Ltd & Cayuga Ltd	Earthworks	General	Oppose	Opposes in part the Earthworks chapter, noting that small-scale, occasional earthworks are essential for primary production, land management, and health and safety, and are critical to the economic and sustainable management of land and water resources.	None specified.
299.109	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW-O1 Earthworks activities Earthworks activities enable people and communities, social	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain EW-O1 as notified.
299.110	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW-O3 Protecting communities Earthwork activities are undertaken in a manner that maint	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain EW-O3 as notified.
299.111	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW-O2 Protecting sensitive environments Indigenous biodiversity, natural landscapes, natur	Support	Supports EW-O2 with modification to clarify and narrow scope by defining “natural landforms,” referencing “Significant Natural Areas” for indigenous biodiversity, and aligning references to “natural landscapes” and “natural features” with Outstanding Natural Landscapes and Features, while ensuring existing earthworks in sensitive environments can continue. Considers the objective should also reference ‘Historic and Cultural Values’ for clarity and efficiency, and protect long-standing activities like the Oamaru Stone Quarry within sensitive environments.	Amend EW-O2 to refer clearly to provisions with identified values as follows: ~~Indigenous biodiversity~~ Significant Natural Areas, Outstanding natural landscapes, ~~natural landforms~~, Outstanding natural features, ~~mana whenua~~ and historic and cultural ~~heritage~~ values are protected from the adverse effects of new earthworks.
299.112	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW-P1 Enabling earthworks Enable earthworks where the scale, extent and effects are approp	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain EW-P1 as notified.
299.113	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW-P2 Protecting sensitive environments Provide for earthworks where adverse effects on th	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain EW-P2 as notified.

299.114	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW-P3 Conservation activities within sensitive environments Enable earthworks that facilit	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain EW-P3 as notified.
299.115	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW-P4 Primary production activities Enable earthworks that support the operational effi	Support	Supports EW-P4 with modification to allow earthworks for installing identified infrastructure and farm buildings, as considers these are managed by existing standards and provide positive environmental effects. Considers enabling primary production activities should be maximised outside sensitive environments, which are already protected by other plan provisions.	Amend EW-P4 as follows: Enable earthworks that support the operational efficiency of primary production activities, including the construction, maintenance and repair of existing farm tracks, farm buildings, yards, irrigation systems, fences, dams, stormwater infrastructure, sedimentation ponds, culverts and stormwater drains.
299.116	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW-P5 Construction and maintenance of farm tracks and recreational tracks Enable earthwork	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain EW-P5 as notified.
299.117	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW-P6 Earthworks within the National Grid Yard Enable earthworks within the National Grid	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain EW-P6 as notified.
299.118	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW-P7 The effects of earthworks Manage any earthworks to avoid, remedy or mitigate adve	Support	Supports with modification to clarify that effects should be controlled beyond the site boundary and that visual amenity and local amenity values should only apply off-site and in sensitive environments, while removing soil quality from EW-O3 and EW-P7 as it is a regional council matter.	Amend EW-P7 as follows: Manage any earthworks to avoid, remedy or mitigate adverse effects on the following: 1. the stability of land, buildings and structures at or beyond the boundary of the site; and 2. the visual amenity values of the site in a sensitive environment, and after rehabilitation; and ~~3. natural landforms; and~~ 4. local amenity values beyond the boundary of the site; and 5. erosion and sediment loss from the site; and ~~6. natural hazard risk; and~~ 7. the stormwater management systems; and 8. dust, lighting, odour, vibration, noise and traffic beyond the boundaries of the site; and ~~9. soil quality.~~
299.119	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW-P8 Rehabilitation of disturbed ground Enable earthworks that enhance, restore or rehabi	Support	Supports EW-P8 with modification that restoration should not always reflect the surrounding landform and vegetation, but enhancement or rehabilitation may require different approaches such as replacing undesirable species with more suitable ones. Considers the policy should enable positive changes rather than require strict replication of existing conditions.	Amend EW-P8 as follows: Enable earthworks that enhance, restore or rehabilitate areas of disturbed ground ~~to reflect the surrounding landform and vegetation~~.
299.120	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW-R1 General earthworks located outside of a sensitive environment All zones Activit	Support	Supports EW-R1 with modified standards. [Refer to original submission for full reasons]	Seeks to retain as notified but with amended standards. [Refer to original submission for relief sought]

299.121	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW-R2 Earthworks for repair and maintenance activities within or outside of a sensitive enviro	Support	Supports EW-R2 with the addition of construction of infrastructure and farm buildings, so that earthworks for house builds or small sheds are permitted without unnecessary extra consent, while large-scale construction remains controlled by existing thresholds.	Amend EW-R2 as follows: Earthworks for construction, repair and maintenance activities within or outside of a sensitive environment PER-1 ... 9. coastal hard protection structures; ~~and~~ 10. farm buildings; and ... PER-3 Earthworks undertaken for the lawful establishment of: 1. farm tracks; 2. yards; 3. water supply and irrigation systems; 4. fences; 5. dams/ponds; 6. walking and cycling tracks; 7. driveways and accessways; 8. stormwater infrastructure, sediment detention ponds, culverts and stormwater drains; 9. coastal hard protection structures;
299.122	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW-R3 Earthworks for the construction of farm tracks, public footpaths, public bridle paths an	Support	Supports EW-R3 with modification to allow wider dairy tracks (at least 6.5-8m) and accommodate larger machinery, as recommended by DairyNZ and typical for the Waitaki District.	Amend EW-R3 as follows: Where: PER-1 The track is associated with a permitted or lawfully established activity within the zone and does not exceed ~~4~~8 metres in width with an additional allowance of 1 metre either side of the track for battering; and
299.123	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW-R4 Earthworks for conservation activities within a sensitive environment All zones	Support	Supports EW-R4 with a higher threshold, as considers requiring consent for conservation earthworks in sensitive environments could discourage important activities like fencing SNAs or planting indigenous species. Considers the definition of conservation activities is already limited, and that effects should generally be managed by standards. [Refer to original submission for full reasons]	Seeks to either permit the relevant earthworks thresholds for the underlying zone or increase the threshold within all conservation activities rules. Also seeks to amend EW-R4 as follows:

						Earthworks for conservation activities within a riparian margin or sensitive environment Activity status: Permitted Where: PER-1 ~~On any site earthworks do not exceed 25m2 in area over any 3 year period.~~ ~~PER-2~~ All of the following standards are complied with: 1. EW-S2 Maximum cut depth and fill height; 2. EW-S3 Earthworks on sloping sites; and ~~3. EW-S4 Earthworks within 20m of a waterbody.~~ Activity status when compliance is not achieved: Restricted Discretionary Where: RDIS-1 Compliance is not achieved with ~~PER-2~~ PER-1 Matters of discretion are restricted to: 1. the matters of discretion listed in any of the standards EW-S2, EW-S3 and/or EW-S4 that are not complied with. ~~Activity status when compliance is not achieved: Discretionary~~ ~~Where:~~ ~~DIS-1~~ ~~Compliance is not achieved with PER-1~~
299.124	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW-R5 Earthworks within a riparian margin All zones Activity status: Permitted Wher	Support	Supports EW-R5 with modification to clarify the distinction between regional and district council responsibilities, remove duplication in matters of discretion, permit maintenance of water supply systems in addition to irrigation systems as effects are similar, and limit consideration of cumulative effects to those specifically identified. Considers that access for mahika kai purposes is managed by the Sites and Areas of Significance to Māori chapter.	Amend EW-R5 as follows: ... PER-3 ... c. water supply or irrigation systems; ...

						Matters of discretion are restricted to: ... 2. the extent and management of adverse effects <u>or cumulative effects</u> on natural character of the riparian margin, including: a. the extent to which the proposed earthworks will: i. allow natural elements to dominate; and ~~ii. introduce man-made elements to the riparian margin; and~~ iii. affect the amenity values of the riparian margin; and ... ~~ix. restrict access for mahika kai purposes; and~~ ~~3. any cumulative effects.~~
299.125	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW-R6 Earthworks and land disturbance within the National Grid Yard All zones Activit	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain EW-R6 as notified.
299.126	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW-R7 Earthworks within a sensitive environment All zones Activity status: Discretion	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain EW-R7 as notified.
299.127	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW-S1 Threshold areas (m2) All Residential Zones Rural Lifestyle Zone Settlement Zo	Oppose	Opposes EW-S1. Considers that area thresholds are an inadequate tool for managing earthworks as they focus on the size of the activity rather than its environmental impact and effect management should take precedence over area measurement. Considers that thresholds should be used as matters of discretion or permitted activity criteria, not rigid limits and that the current thresholds are too low, capturing routine activities like house scrapes, silage pits, and shed construction. Also considers that the standards duplicate those in the NFL chapter, regarding landscape effects, which are subjective and undefined outside NFL overlays. [Refer to original submission for full reasons]	Seeks to remove area thresholds so they default to regional council thresholds and introduce standards or permitted activity criteria to manage the effects of earthworks directly. If threshold areas are to remain seeks to increase threshold to 1,000m^2 for all zones to be consistent with the enabling intent of EW-O1, EW-P1, EW-P3, and EW-P4. Seeks to amend EW-S1 as follows: ... 1. The quantity of earthworks must not exceed ~~300m^2~~<u>1,000m^2</u> in any 12 month period per site. 2. The quantity of earthworks must not exceed ~~500m^2~~<u>1,000m^2</u> in area in any 12 month period per ~~site~~ <u>100ha</u>. ...

						Matters of discretion are restricted to: 1. whether ~~the~~ earthworks changing the landform of a ridgeline are of a type, scale and form that is appropriate for the location and anticipated character of the zone; and 2. the management of silt, sediment and erosion on-site; and 3. impacts on ~~character and~~ amenity values beyond the site boundary, ~~natural landforms and features~~, including whether the cut face and/or any retaining structures can be concealed behind development or effectively landscaped; and 4. ~~visual amenity, including~~ landscape treatment, site reinstatement and screening; and ~~5. the potential for cumulative effects on the natural form of the landscape; and~~ ... ~~Note: A landscape assessment may be required for the assessment of this standard.~~ ...
299.128	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW-S2 Maximum cut depth and fill height The cut depth or fill height must not exceed 1	Support	Supports EW-S2 with modification to reduce the number of consents that will be required across the district.	Seeks to increase the cut and fill in EW-S2 to 3m, or alternatively exclude house scrapes from cut and fill calculations in all zones. Seeks to amend EW-S2 as follows: 1. The cut depth or fill height must not exceed ~~1.5~~3metres as measured vertically; and 2. Cut or fill supported by a retaining wall must be setback a distance at least equal to the height of the retaining wall. 3. Cut and fill equal to or less than 0.5m in height is exempt from this standard. 4. Cut and fill for building platforms is exempt from this standard. 5. Earthworks over 1.5m in height or depth that take place within 1.5m of a site boundary require a written approval from the adjoining landowner. ... ~~Note: Earthworks over 1.5m in height or depth that take place within 1.5m of a site boundary may require a written approval from the adjoining landowner.~~
299.129	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW-S3 Earthworks on sloping sites Earthworks must not	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain EW-S3 as notified.

			take place on slopes with an ang			
299.130	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW-S4 Earthworks within 20 metres of a waterbody Earthworks shall not take place withi	Support	Supports EW-S4 with modification to reduce consent costs and improve clarity around when ecological or landscape reports are required. Considers that landscape assessments should not be required outside of the NFL chapter, and ecological reports should only be required where there is risk to the waterbody or an SNA within the riparian margin. [Refer to original submission for full reasons]	Amend EW-S4 as follows: Matters of discretion are restricted to: 1. the provision of sediment control techniques to ensure sediment run-off does not enter a waterbody; and 2. effects <u>of earthworks within 5m of the waterbody</u> on the natural character and ecological values of the waterbody; and ~~3. impacts on the character and amenity values, natural landforms and features; and~~ ~~4. management of visual amenity effects through~~ landscape treatment, site reinstatement and screening; and ~~5. the potential for cumulative effects on the natural form of the landscape.~~ Note: A site management plan may be required for consideration of the assessment matter 1. Note: An ecological report ~~and/or landscape assessment~~ may be required for consideration of matter~~s~~ of discretion (2), ~~(3), (4) and (5)~~ in EW-S4.
299.131	Twin Terraces Ltd & Cayuga Ltd	Earthworks	General	Support	Supports in general the rules, objectives and policies in Part B (Earthworks - Quarrying for aggregate). Particularly supports EW(Q)-P1 (Farm quarries), as enabling on-farm aggregate use benefits the environment by reducing road wear and transport emissions.	Retain Part B (Earthworks - Quarrying for aggregate) as notified.
299.132	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW(Q)-P4 Existing quarries Enable the continued operation of existing lawfully established	Support	Supports EW(Q)-P4. Considers it critical to protect existing quarries beyond existing use rights, to avoid excessive consent barriers that could threaten their continued operation, similar to the challenges faced by landfills.	Retain EW(Q)-P4 as notified.
299.133	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW(Q)-R1 Farm quarry General Rural Zone Special Purpose Zone - Macraes Mining Activ	Support	Supports EW(Q)-R1 with modification. Considers the current restriction on quarrying in sensitive environments is too broad and prevents the economic benefits of farm quarrying from being realised across much of the district. Considers the rule should be proportionate to the scale limits already in place and earthworks in sensitive environments are managed by other chapters.	Amend EW(Q)-R1 as follows: ... PER-6 The farm quarry is not located within a ~~sensitive environment~~ or within the Coastal Environment or Coastal Natural Hazard overlays.
299.134	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW(Q)-R4 Quarrying activities (excluding farm quarry and restricted use quarry) Special	Support	Supports with modification for consistency, as the current daily extraction limit of 100m^3 in CON-3 is inconsistent with the allowed number of heavy vehicle trips in CON-4.	Amend EW(Q)-R4 as follows:

						CON-3 The quantity of aggregate extracted is limited to ~~100m^3~~ 200m^3 day; and
299.135	Twin Terraces Ltd & Cayuga Ltd	Earthworks	General	Support	Supports in general Part C (Earthworks - Mining), however considers that quarrying activities currently captured by the mining definition should instead be managed under quarrying provisions to ensure protection for existing quarries.	Retain as notified but with changes to mineral definition as submitted.
299.136	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	General	Oppose	Opposes in part the entire chapter. Considers proceeding with identifying new SNAs before the government's review and changes to the NPS-IB will create unnecessary and repeated requirements for landowners and the community, especially given the current suspension of council obligations to identify new SNAs until October 2027.	Seeks to retain the existing policy and rule framework for managing indigenous biodiversity in the ODP and implement only the requirements of the NPS-IB where SNAs have already been identified by the current/operative district plan. Seeks to defer the wider chapter review until there is more certainty from government and until such time that the review of the NPS-IB has occurred.
299.137	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-O1 Halt the decline of indigenous biodiversity Halt the decline of the Waitaki Dist	Oppose	Opposes in part ECO-O1. Supports the management of indigenous biodiversity in line with national direction, but seeks amendment to focus maintenance and enhancement efforts on significant habitats and fauna, rather than requiring resource-intensive calculations across all zones. Considers the objective should prioritize consistency with national policy and target significant areas for enhancement where appropriate.	Amend ECO-O1 as follows: ~~Halt the decline~~ Manage of the Waitaki District's indigenous biodiversity ~~so there is at least no overall loss, including between species and ecosystems,~~ by maintaining and, where appropriate, enhancing indigenous biodiversity, in areas of mapped significant indigenous habitats and significant fauna (Significant Natural Areas) ~~and to achieve this~~ by: 1. protecting and restoring indigenous biodiversity as necessary to achieve the ~~overall~~ maintenance of indigenous biodiversity while providing for the social, cultural and economic wellbeing of people and communities now and in the future; and 2. recognising the mana of takata whenua ~~as~~ to exercise kaitiaki ~~of~~ in relation to maintaining, enhancing and restoring indigenous biodiversity; and 3. recognising people and communities, including landowners, as guardians of indigenous biodiversity.
299.138	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-O2 Identify and protect Significant Natural Areas Areas identified as Significant Natu	Oppose	Opposes in part ECO-O2. Seeks modification for clarity and consistency with ECO-O1, and to ensure the objective focuses on the purpose of identifying SNAs, involves transparent partnership with landowners, and does not discourage new indigenous plantings. Considers SNAs should only be identified where indigenous biodiversity already exists as of March 1, 2025 and the process should recognise the role of sustainable land uses in maintaining significant values and avoid duplicating efforts or undermining trust with landowners. [Refer to original submission for full reasons]	Amend ECO-O2 as follows: ECO-O2 Identify ~~and protect~~ Significant Natural Areas ~~Areas identified as Significant Natural Areas are protected to ensure no net loss of indigenous biodiversity or indigenous biodiversity values as a result of land use activities.~~ Work with people and communities, including mana whenua and land owners, to identify Significant Natural Areas of indigenous biodiversity established in accordance with the NPS-IB.

299.139	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-O3 Restore or enhance Significant Natural Areas Significant Natural Areas are resto	Support	Supports in part ECO-O3, agreeing that restoration and enhancement should be encouraged where appropriate, but also emphasising the need to allow appropriate development where area values can be maintained, as many existing land management practices have enabled the ongoing maintenance of significant areas of indigenous habitats and fauna to date, and create opportunities to encourage enhancement of these values.	Amend ECO-O3 as follows: Existing mapped Significant Natural Areas are restored or enhanced, where appropriate and provision is made for the appropriate subdivision, use and development where the values of the area can be maintained.
299.140	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-P1 Evaluation of Significant Natural Areas Identify the ecological significance of	Oppose	Opposes ECO-P1. Considers it should be deferred until the government review of the NPS-IB is complete.	Seeks for the deletion of ECO-P1 [Refer to original submission for full relief sought] If ECO-P1 is not deleted, seeks to amend it as follows: Work with mana whenua and land owners to ~~i~~Identify the ecological significance of indigenous vegetation and habitats of indigenous fauna established before 1st March 2025 using; ~~1. the criteria contained in APP5 – Criteria for identifying areas that qualify as Significant Natural Areas (SNA); or~~ 1. The criteria in the NPS IB; or 2. in the case of Crown owned land, Clause 3.8(8) of the National Policy Statement on Indigenous Biodiversity and: ~~3. where they are known and meet the criteria to be SNA's, list them in SCHED6 Significant Natural Areas and on the Planning Maps;~~ ~~3. where they are not known,~~ applying the criteria through the resource consent process, notice of requirement, outline plan, or other planning processes, to determine an area's significance; and 4. if a new Significant Natural Area is identified as a result of a resource consent application, include the SNA in SCHED6 – Significant Natural Areas in the next appropriate plan review or plan change notified by Waitaki District Council.
299.141	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-P2 Protection of Significant Natural Areas Except as provided for in clause 2 belo	Support	Supports in part ECO-P2 with modification to split into simpler policies for clarity and ensuring sustainable land uses can continue alongside SNAs where effects are managed so landowners can maintain pest control and reinvestment in significant natural areas.	Amend ECO-P2 as follows: 1. Except as provided for in clause 2 below, protect Significant Natural Areas listed in SCHED6 – Significant Natural Areas by: a. ensuring the following adverse effects are avoided, remedied or mitigated on the: i. loss of ecosystem representation and extent; .... 2.~~The~~ Manage any adverse effects of subdivision, use and development on identified SNA's ~~shall be managed~~ in accordance with 1.b. above only, in relation to the following activities: a. the new subdivision, use or development is required for the purposes of any of the following: i. construction or upgrade ~~(if the upgrade does not meet the requirements of clause 3.15(2) of the National Policy Statement~~

						~~on Indigenous Biodiversity)~~ of specified infrastructure that provides significant national or regional public benefit: or ... v. there is a functional need or operational need for the new subdivision, use or development to be in that particular location~~;~~ and ~~vi.~~ there are no practicable alternative locations for the new subdivision, use or development;
299.142	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-P3 Appropriate activities within Significant Natural Areas Enable limited - earthw	Support	Support in part - [No specific reason given]	Amend ECO-P3 as follows: Enable limited - ... 3. Is for a lawfully established activity; or 4. The activity as a functional need to be located in the area; or 5. The activity has no more than minor adverse effects on the significant indigenous vegetation of fauna or habitat.
299.143	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-P4 Supporting the maintenance, restoration and enhancement of indigenous biodiversity	Support	Supports in part ECO-P4 with modifications to reflect that different areas and different characteristics may require different approaches to management. Considers that primary production activities can benefit the ongoing maintenance or enhancement indigenous biodiversity, and that eco-sourced planting should only be required where justified. Also notes that integrated management across administrative boundaries can only be encouraged, not enforced.	Amend ECO-P4 as follows: ... 3. encouraging, ~~or where appropriate requiring,~~ the use of eco-sourced indigenous plantings where it is available; 4. ~~ensuring it is managed~~ encourage management in an integrated way, within, and across administrative boundaries; 5. giving effect to the decision-making principles set out in Clause 1.5 of the National Policy Statement on Indigenous Biodiversity; 6. recognising that maintaining indigenous biodiversity ~~requires~~ can be achieved by: a. the maintenance and ~~at least~~ no overall reduction of ~~all~~ the following: i. the size of populations of indigenous species; ... 7. promoting increased indigenous vegetation cover in both urban environments and non-urban environments where appropriate; 8. requiring that significant adverse effects of activities on indigenous biodiversity (outside of SNA's or on specified Māori land) are managed by applying appropriate thresholds for indigenous vegetation clearance which was established after 1st March 2025, and where these are not met, by applying the biodiversity effects management hierarchy. 9. Recognising the benefits of farm management practices and active management of indigenous biodiversity including voluntary

						animal and plant pest and stock control and/or formal legal protection.
299.144	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-P5 National priorities for protection Recognise the following national priorities f	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-P5 as notified.
299.145	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-P6 Impacts of climate change on resilience of ecosystems Take into account the potenti	Support	Supports ECO-P6 with modifications to align with the NPS-IB by focusing on considering specific, known effects of climate change rather than speculative future impacts.	Amend ECO-P6 as follows: ~~Take into account the potential future impacts~~ Consider the effects of climate change to promote resilience of indigenous biodiversity to climate change: ...
299.146	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-P7 Providing for the relationship of takata whenua with indigenous biodiversity Pro	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-P7 as notified.
299.147	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-P8 Indigenous vegetation on urban environment allotments Recognise that indigenous	Support	Supports ECO-P8 with modifications to include 'domestic curtilage' as defined in the plan, to ensure properties with septic tanks that don't meet the 'urban environment allotment' definition aren't unnecessarily subject to the ECO chapter's stricter requirements.	Amend ECO-P8 as follows: ECO-P8 Indigenous vegetation on domestic curtilage ~~urban environment allotments~~ Recognise that indigenous vegetation on domestic curtilage ~~urban environment allotments~~ is not protected, unless specifically scheduled in the plan as a Significant Natural Area or Notable Tree.
299.148	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-P9 Precautionary approach Adopt a precautionary approach to considering the adverse	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-P9 as notified.
299.149	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-P10 Provision for maintenance of improved pasture for primary production where it may affe	Support	Supports ECO-P10 with modifications to improve clarity by removing the subjective requirement for 'adequate evidence' of regular pasture maintenance, as the definition of pasture already implies this. Also consider that the clause excluding improved pasture that has become an SNA is unnecessary and circular, since such areas are already protected under SNA provisions.	Amend ECO-P10 as follows: Allow for the maintenance of improved pasture to continue where: 1. ~~there is adequate evidence to demonstrate that~~ the maintenance of improved pasture is part of a regular cycle of periodic maintenance of that pasture; 2. any adverse effects of the maintenance of improved pasture on an identified SNA are no greater in intensity, scale, or character than the effects of activities previously undertaken as part of the regular cycle of periodic maintenance of that pasture; ~~3. the improved pasture has not, itself, become an SNA;~~ ~~4. the land is not an uncultivated depositional landform; and~~ 5. the maintenance of improved pasture will not adversely affect a threatened or at risk (declining) species.

299.150	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-P11 Highly mobile fauna In relation to habitats of highly mobile fauna: identify a	Oppose	Opposes ECO-P11. Considers the policy should be deferred until the NPS-IB review is complete.	Seeks to delete ECO-P11. If retained, seeks modification to ECO-P11 to make it consistent with the NPS IB and prevent duplication between territorial authority and regional council as follows: In relation to habitats of highly mobile fauna: 1. Assist the regional council to identify and manage areas outside of SNA's that support specified highly mobile fauna to maintain their populations across their natural range, and improve information and awareness around them; and 2. manage the adverse effects of activities on them, in order to maintain viable populations of specified highly mobile fauna across their natural range. [Refer to original submission for full relief sought]
299.151	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-P12 Restoration of indigenous biodiversity In relation to restoration of indigenous	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-P12 as notified.
299.152	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-P13 Commercial forestry In relation to commercial forestry: the adverse effects of	Support	Supports in part ECO-P13 with appropriate management of commercial forestry within existing mapped SNA areas.	Seeks to amend as follows: In relation to commercial forestry: 1. the adverse effects of commercial forestry activities in any existing commercial forest on any identified SNA must be managed in a manner that: a. maintains indigenous biodiversity in the identified SNA as far as practicable; while b. providing for commercial forestry activities to continue; and 2. despite ECO-P2, any part of an identified SNA that is within an area of an existing commercial forest that is planted, or is intended to be, replanted in trees for harvest must be managed over the course of consecutive rotations of production in the manner necessary to maintain the long-term populations of any threatened or at risk (declining) species present in the area.
299.153	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-P14 Managing indigenous vegetation outside Significant Natural Areas Avoid signific	Oppose	Opposes ECO-P14. Considers the policy is overly broad and imposes disproportionate cost and complexity across the district, despite the NPS-IB not requiring territorial authorities to avoid significant adverse effects on indigenous vegetation outside SNAs.	Seeks to delete ECO-P14.
299.154	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-P15 Inappropriate activities within or near to Significant Natural Areas Prohibit t	Support	Supports ECO-P15 with modification to specify that only deliberate planting is included.	Amend ECO-P15 as follows: Prohibit the deliberate planting of: ...

299.155	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-R1 Indigenous vegetation clearance outside of a Significant Natural Area listed in SCHED6	Support	Supports ECO-R1, in particular the provision permitting indigenous vegetation clearance for existing established activities, provided appropriate thresholds or circumstances are met.	Retain ECO-R1 as notified.
299.156	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-R2 Indigenous vegetation clearance within a Significant Natural Area listed in SCHED6 – Si	Support	Supports in part ECO-R2. Endorses clearance of indigenous vegetation where there is a functional need within listed SNAs, but suggests that minor breaches of permitted activity standards may not always warrant an ecological assessment and this should be reflected in the note.	Seeks to amend note as follows: Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any application made under this provision ~~must provide~~ will likely require, in addition to the standard information requirements, an Ecological Assessment, provided by a suitably qualified ecologist, that is commensurate with the scale and significance of the proposal, and meets the requirements of APP8 - ECO Chapter Information Requirements for Resource Consents.'
299.157	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-R3 Earthworks within a Significant Natural Area listed in SCHED6 – Significant Natural Are	Support	Supports in part ECO-R3 with modifications to improve practicality by allowing earthworks within mapped SNAs where there is a functional need, and reconsidering the 10 working days' notice requirement, which may not be feasible in cases like emergencies or weather delays. Additionally, minor earthworks exceeding permitted standards may not always justify an ecological assessment, and the note should reflect this flexibility.	Seeks to amend as follows: PER-3 Silt and sediment control measures are in place to prevent discharge of silt and/or sediment into the Significant Natural Area ~~and notice is provided to Council 10 working days prior to the commencement of works.~~ ... Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any application made under this provision ~~must provide~~ will likely require, in addition to the standard information requirements, an Ecological Assessment, provided by a suitably qualified ecologist, that is commensurate with the scale and significance of the proposal, and meets the requirements of APP8 - ECO Chapter Information Requirements for Resource Consents.
299.158	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-R4 Exotic commercial forestry, agricultural intensification, quarrying activity or mining	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain as notified but move the Matters of Discretion into the correct column.
299.159	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-R5 Commercial forestry, agricultural intensification, quarrying activity or mining activit	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-R5 as notified.
299.160	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-R6 Planting non-indigenous vegetation within a Significant Natural Area listed in SCHED6 –	Support	Supports in part ECO-R6. Considers that a blanket prohibition on planting non-indigenous vegetation within SNAs could significantly impact existing primary production, and suggests that such activities should be considered through a resource consent process where adverse effects can be appropriately managed.	Amend ECO-R6 as follows: ECO-R6 ~~Planting~~ Deliberate planting of new non-indigenous vegetation within a Significant Natural Area listed in SCHED6 – Significant Natural Areas Activity status: ~~Prohibited~~ Discretionary

299.161	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-R7 Planting species that result in wilding conifers within a Significant Natural Area, or	Oppose	Opposes in part ECO-R7. Considers it should be clarified that only deliberate planting is controlled by ECO-R6 and ECO-R7.	Amend ECO-R7 as follows: ~~Planting~~ Deliberate planting of species that result in wilding conifers within a Significant Natural Area, or within 100m of a Significant Natural Area listed in SCHED6 – Significant Natural Areas
299.162	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-S1 Indigenous vegetation clearance in highly sensitive ecological environments that are no	Oppose	Opposes ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification, and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'sensitive environment', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators. Considers the boundaries of a calcareous boulder field is inherently unclear and where these are to be controlled by ECO-S1 they should be mapped for clarity and justified for inclusion to ensure existing land use can continue while protecting indigenous vegetation that has been identified. [Refer to original submission for full reasons]	Seeks the following: 1. Include a schedule with wetlands the standard applies to. 2. Map calcareous boulder fields where evidence exists of sufficient indigenous biodiversity value to justify being classed as highly sensitive ecological environment. 3. Apply the standards only to areas assessed as meeting the requirements of an SNA. Also seeks to amend ECO-S1 as follows: ECO-S1 Indigenous vegetation clearance in highly sensitive ecological environments that meet SNA criteria but are not currently identified as Significant Natural Areas Apart from maintenance of improved pasture, there ~~There~~ shall be no indigenous vegetation clearance in the following locations: ... [Refer to original submission for full relief sought]
299.163	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-S2 Indigenous vegetation clearance in sensitive ecological environments that are not curre	Oppose	Opposes ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification, and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'sensitive environment', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators, and that standards should only apply to areas that have been assessed as meeting the requirement of a Significant Natural Area. [Refer to original submission for full reasons]	Amend ECO-S2 as follows: ECO-S2 Indigenous vegetation clearance in sensitive ecological environments that meet SNA criteria but are not currently identified as Significant Natural Areas [Refer to original submission for full relief sought]
299.164	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-S3 Indigenous vegetation clearance in threatened land environments Indigenous veget	Oppose	Opposes ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification, and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'sensitive environment', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability	[Refer to original submission for full relief sought] Amend ECO-S3 as follows:

					for operators, and that standards should only apply to areas that have been assessed as meeting the requirement of a Significant Natural Area. [Refer to original submission for full reasons]	ECO-S3 Indigenous vegetation clearance in threatened land environments that meet SNA criteria but are not currently identified as Significant Natural Areas.
299.165	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-S4 Indigenous vegetation clearance areas dominated by snow tussock Indigenous vegetati	Oppose	Opposes ECO-S1 to ECO-S4 as considers they are overly broad without sufficient justification, and rely on undefined or unmapped terms like 'highly sensitive ecological environment' and 'sensitive environment', making compliance impractical. Considers the plan should instead use clearly defined and mapped terms such as 'wetlands' to ensure clarity and usability for operators, and that standards should only apply to areas that have been assessed as meeting the requirement of a Significant Natural Area. [Refer to original submission for full reasons]	[Refer to original submission for full relief sought] Amend ECO-S4 as follows: Indigenous vegetation clearance areas identified as dominated by snow tussock
299.166	Twin Terraces Ltd & Cayuga Ltd	Ecosystems and Indigenous Biodiversity	ECO-S5 General indigenous vegetation clearance If not addressed by ECO-S1 to ECO-S4, th	Support	Supports ECO-S5 with amendments to ECO-S1 to ECO-S4.	Retain ECO-S5 as notified, provided that modifications are made to ECO-S1 through ECO-S4 [Inferred relief]
299.167	Twin Terraces Ltd & Cayuga Ltd	Natural Character	General	Support	Supports Natural Character chapter in general, with modification to the riparian margin definition.	Retain as notified with modification to the riparian margin definition.
299.168	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	General	Support	Supports in part the Natural Features and Landscapes chapter but considers the extent of associated NFL overlay mapping is too broad and the stringent provisions applied to NFL overlays are disproportionate to the land types and the scale of coverage. The submitter considers that, given the remote roadside and desktop-based nature of the current mapping - contrasted with the strict objectives, policies, and rules - it would be beneficial to undertake ground-truthing of the overlays in collaboration with landowners. This approach is seen as a way to reduce the risk of inadvertent breaches of the District Plan by improving landowner awareness and understanding. If changes to the ONF22 overlay are not made as requested, the submitter opposes the entirety of the NFL chapter. [Refer to original submission for full reasons]	Seeks the adjustment of NFL overlay boundaries. [Refer to original submission for full relief sought]
299.169	Twin Terraces Ltd & Cayuga Ltd	SCHED7 – Schedule of Outstanding Natural Features	ONF22 Outstanding Natural Feature Waitaki River Feature description Large brai	Oppose	Opposes the extent of ONF22. Considers that the mapped overlay areas too broad and the associated rules disproportionate to the actual landscape characteristics. Reliance on existing use rights is considered problematic. Activities such as agricultural intensification may lose existing use status if paused for a year, creating a risk of locking in current land uses and requiring new consents to resume activities. The submitter considers that	Seeks the following: • Remove all formerly border-dyked land, current dairy farming areas, irrigated land, and improved pasture from the NFL overlays.

					mapping improved pasture alongside the river within the Waitaki River ONF is inconsistent with the RMA definition of "river." The current overlay mapping is largely based on remote, roadside, or desktop assessments. Given the strict objectives, policies, and rules that apply, the submitter considers that ground-truthing should be undertaken in collaboration with landowners to reduce the risk of inadvertent District Plan breaches and improve awareness. The submitter also considers that formerly border-dyked land, current dairy farming areas, irrigated land, and other improved pasture have lost their landscape values after a century of modification, physical change, and dominance of exotic species, and therefore should not be included within NFL overlays. [Refer to original submission for full reasons]	• Amend the boundaries of ONF22 as per map provided in original submission, and zone the land Rural General. • Formally protect existing use rights within the plan so they cannot be lost through lapsing or activity pauses. [Refer to original submission for full relief sought]
299.170	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-O1 Outstanding Natural Features and Landscapes Outstanding Natural Features and Landsc	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain NFL-O1 as notified.
299.171	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-O2 Significant Natural Features and Rural Scenic Landscapes The values of Significant	Support	Supports in part NFL-O2 to protect Significant Natural Features and Rural Scenic Landscapes, but suggests values should be maintained only where appropriate.	Amend NFL-O2 as follows: The values of Significant Natural Features and Rural Scenic Landscapes are maintained <u>where appropriate</u>.
299.172	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-O3 Wilding conifers The impact of wilding conifers on Outstanding Natural Features and	Support	Supports in part NFL-O3. Supports the intent of the policy and considers it should encourage the reduction of effects of wilding conifers on landscape areas.	Amend NFL-O3 as follows: <u>Encourage</u> the impact of wilding conifers on Outstanding Natural Features and Landscapes, Significant Natural Features, and Rural Scenic Landscapes ~~is~~ <u>be</u> reduced.
299.173	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-O4 Restoration and enhancement of landscapes Outstanding Natural Features and Landscap	Oppose	Opposes NFL-O4. Considers that it could result in subjective assessments and requiring restoration and enhancement of landscape values may not always be practicable. Considers that the other objectives achieve the intent of the RMA in protecting and managing natural features and landscapes.	Seeks to delete NFL-O4, alternatively if NFL-O4 is retained seeks to amend it as follows: <u>Where practicable,</u> Outstanding Natural Features and Landscapes, Significant Natural Features, and Rural Scenic Landscapes are restored and enhanced, where their values <u>listed in this plan</u> have been lost or degraded.
299.174	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-P1 Identification of Outstanding Natural Features and Landscapes In relation to the	Support	Supports in part NFL-P1 with modification. Considers the current wording is an inaccurate and ineffectual 'lowering of the bar' for identifying landscapes as ONL and ONF, and the same criteria should apply to SNF and RSL. Recommends using the full Pigeon Bay criteria as current wording omits some of the criteria and could be misleading. Also considers the policy implies changes could occur outside of the plan change or review process.	Seeks the deletion of NFL-P1. Alternatively, if NFL-P1 is retained, the submitter seeks amendments to incorporate all Pigeon Bay criteria, require onsite assessment in consultation with the landowner, and include a note that any changes to landscape identification will occur only through a normal plan change or plan review process.
299.175	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-P2 Identification of Significant Natural Features and Rural Scenic Landscapes In re	Support	Supports in part NFL-P2. Considers the current wording is an inaccurate and ineffectual 'lowering of the bar' for identifying landscapes as ONL and ONF, and the same criteria should apply to SNF and RSL. Recommends using the full Pigeon Bay criteria as	[Inferred relief - refer to full submission] Seeks the deletion of NFL P2. Alternatively, if NFL P2 is retained, the submitter seeks amendments to incorporate all Pigeon Bay

					current wording omits some of the criteria. Also considers the policy implies changes could occur outside of the plan change or review process.	criteria, require onsite assessment in consultation with the landowner, and include a note that any changes to landscape identification will occur only through a normal plan change or plan review process.
299.176	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-P3 Recognise the importance of protecting natural features and landscapes Recognise:	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain NFL-P3 as notified.
299.177	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-P4 Avoiding inappropriate activities on or within Outstanding Natural Features or Landscap	Support	Supports in part NFL-P4 with modification. Considers that at present the 'adverse effects on other Outstanding Natural Features and Landscape values' are not identified apart from 'avoiding any significant loss of indigenous vegetation' which will lead to ambiguity. Also considers that values that have not been assessed against the Pigeon Bay criteria and identified by a landscape architect do not need to be protected. Seeks to ensure that the policy clearly discourages critical infrastructure in outstanding landscape areas.	Seeks to amend as follows: Only provide for subdivision, use and development where it: 1. protects the values identified in SCHED7 – Outstanding Natural Features and SCHED8 – Outstanding Natural Landscapes that make the natural feature or landscape outstanding; and ~~2. avoids, remedies or mitigates adverse effects on other Outstanding Natural Features and Landscapes values, including avoiding any significant loss of indigenous vegetation.~~ 2. avoids the placement of critical infrastructure within the Outstanding Natural Features and Landscapes unless there is no reasonable alternative due to the functional need for the location and the adverse effects on landscape values can be avoided or appropriately managed.
299.178	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-P5 Avoiding inappropriate activities on or within Significant Natural Features and Rural S	Support	Supports NFL P5 with modification for clarity. Considers that the references to "amenity values" and "adverse effects on other values" in NFL P5 are unclear because these values are not specifically identified, which may create ambiguity for plan users. Considers that values not assessed against the Pigeon Bay criteria and not identified by a landscape architect do not require protection from activity.	Seeks to amend as follows: Only provide for subdivision, use and development in Rural Scenic Landscapes and on Significant Natural Features where it: 1. maintains ~~amenity values; and~~ the values identified in SCHED9 - Significant Natural Features and SCHED10 - Schedule of Rural Scenic Landscapes. ~~2. avoids, remedies or mitigates adverse effects on other values of Significant Natural Features or Rural Scenic Landscapes, including avoiding any significant loss of indigenous vegetation.~~
299.179	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-P6 Landscape's ability to absorb change When determining a landscape's ability to abso	Support	Supports NFL-P6, NFL-P7, NFL-P8 and NFL-P9, conditional on the landscape overlay [ONF22 - refer to submission point 299.169] being corrected in the same manner as ONF029.	Seeks to conditionally retain as notified.
299.180	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-P7 Earthworks within identified natural features and landscapes When determining if ea	Support	Supports NFL-P6, NFL-P7, NFL-P8 and NFL-P9, conditional on the landscape overlay [ONF22 - refer to submission point 299.169] being corrected in the same manner as ONF029.	Seeks to conditionally retain as notified.
299.181	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-P8 Buildings and structures on or within identified natural features and landscapes Wh	Support	Supports NFL-P6, NFL-P7, NFL-P8 and NFL-P9, conditional on the landscape overlay [ONF22 - refer to submission point 299.169] being corrected in the same manner as ONF029.	Seeks to conditionally retain as notified.

299.182	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-P9 Subdivision on or within identified natural features and landscapes Avoid subdivisi	Support	Supports NFL-P6, NFL-P7, NFL-P8 and NFL-P9, conditional on the landscape overlay [ONF22 - refer to submission point 299.169] being corrected in the same manner as ONF029.	Seeks to conditionally retain as notified.
299.183	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-P10 Wilding conifers Avoid the spread of wilding conifers by: prohibiting planting of	Support	Supports NFL-P10 but notes there is no incentive for landowners to remove wilding conifers and questions the effectiveness without council support.	Seeks to retain as notified but consider deleting clause (2) if there is no intention of following through.
299.184	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-P11 Enhancement and restoration of Outstanding Natural Features and Landscapes, Significan	Support	Supports in part NFL-P11. Supports the intent of the policy to enhance and restore landscape areas, but considers this should be undertaken where it is appropriate to do so.	Seeks to amend as follows: Support the enhancement and <u>where appropriate the</u> restoration of Waitaki's Outstanding Natural Features and Landscapes, Significant Natural Features and Rural Scenic Landscapes where their values have been lost or degraded by: ...
299.185	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-R1 Buildings and structures (excluding fences) on or within Outstanding Natural Features o	Oppose	Opposes NFL-R1. Supports permitting certain structures in ONFs and ONLs, but considers the rule should recognise that primary production activities are compatible with the ongoing management of these landscapes, and that small scale farm buildings and structures should be provided for. The submitter considers that if ONF boundaries are rationalised to only areas that are genuinely natural (not improved pasture), then NFL R1 could be supported.	Seeks to amend NFL-R1 as follows: Activity status: Permitted Where: PER-1 The structure is underground<u>; or</u> <u>PER-2</u> <u>The building or structure is for primary production purposes, excluding residential units; and</u> <u>PER-3</u> <u>The building or structure does not exceed 30m^2; and</u> <u>PER-4</u> <u>The building or structure does not exceed 3m in height; and</u> <u>PER-5</u> <u>The building or structure complies with the following standard:</u> <u>1. NFL-S1</u>
299.186	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-R2 Buildings and structures (excluding fences) on or within Significant Natural Features o	Support	Supports in part NFL-R2. Generally supports permitting buildings in RSLs where specified controls are met. Considers that the rule as drafted unintentionally excludes buildings on SNFs, and seeks amendments so that buildings and structures on SNFs are provided for using the same thresholds suggested for NFL R1 (i.e., 30 m^2 and 3 m in height for minor buildings), or alternatively by applying the same thresholds that apply to buildings in RSLs.	Seeks to amend NFL-R2 as follows: Activity status: Permitted Where: PER-1 The structure is underground; or PER-2

						The building or structure is in a Rural Scenic Landscape ~~(except where it is also located on a Significant Natural Feature)~~; and ...
299.187	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-R3 Permanent fencing on or within Outstanding Natural Features or Landscapes, Significant	Support	Supports NFL-R3 in part, noting that some deer fencing can exceed 2m in height and is important for pest management.	Seeks to amend NFL-R3 as follows: PER-2 Any fence or gates are no more than 1.5m high (except any deer fence which can be up to ~~2m~~ 2.5m high).
299.188	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-R4 Earthworks on or within Outstanding Natural Features or Landscapes or Significant Natur	Support	Supports NFL-R4 in part, but only if improved pasture is removed from ONFL overlays, otherwise, GRUZ earthworks rules should apply. Considers that a limit of $25m^3$ over three years is discouraging for conservation activities, and earthworks are often needed to install tracks to give access for conservation efforts.	Seeks to conditionally retain as notified.
299.189	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-R5 Primary production activities (excluding buildings, mining activities, quarrying activi	Support	Supports NFL-R5 with modification to the agricultural intensification definition and with the alteration of ONFL's and SNF's to omit improved pasture from the overlays.	Seeks to amend the definition of agricultural intensification and remove improved pasture from ONFL's and SNF's. [Refer to original submission for full relief sought]
299.190	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-R6 Amenity planting and shelterbelts on or within Outstanding Natural Features or Landscap	Support	Supports NFL-R6, agreeing that amenity planting and shelterbelts should be permitted in landscape areas, provided the mapping is accurate.	Retain NFL-R6 as notified.
299.191	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-R7 Outdoor recreational activities (excluding buildings) on or within Outstanding Natural	Support	Supports NFL-R7 with modification to exclude not-for-profit and charities from the definition of commercial activities.	Seeks to amend the definition of commercial activities and seeks to add a permitted activity criteria specifically for temporary events, or an advice note advising that the Temporary Events chapter overrides NFL-R7.
299.192	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-R8 Landscape restoration activities on or within Outstanding Natural Features or Landscape	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain NFL-R8 as notified.
299.193	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-R9 Flood protection structures and flood protection works on or within Outstanding Natural	Support	Supports NFL-R9 with modification. Considers that flood protection structures and flood protection works should not be restricted solely to councils, and that doing so would place an unreasonable burden on landowners and other agencies, who may not have sufficient time during flooding events to apply for consent before undertaking necessary flood protection works.	Seeks the deletion of PER-1. Alternatively, seeks to add a note to advise that emergency works are permitted under the RMA.
299.194	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-R10 Plantation Forestry within or on Significant Natural Features or Rural Scenic Landscap	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain NFL-R10 as notified.
299.195	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-R11 Mining activities and/or quarrying activities (excluding existing farm quarries) withi	Support	Supports NFL-R11 and NFL-R12 with modification to protect all existing quarrying and mining activities. [Refer to original submission for full reasons]	Seeks to retain the operative plan SNF.

						Alternatively, seeks to ensure that quarrying of 'building stone' is captured by the quarrying definition and protect quarrying activity on sites with ONF and ONL. Seeks to amend NFL-R11 as follows: NFL-R11 Mining activities and/or quarrying activities (excluding existing ~~farm quarries~~ quarrying activity) within or on Significant Natural Features or Rural Scenic Landscapes [Refer to original submission for full relief sought]
299.196	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-R12 Mining activities and/or quarrying activities (excluding existing farm quarries) on or	Support	Supports NFL-R11 and NFL-R12 with modification to protect all existing quarrying and mining activities. [Refer to original submission for full reasons]	Seeks to retain the operative plan SNF. Alternatively, seeks to ensure that quarrying of 'building stone' is captured by the quarrying definition and protect quarrying activity on sites with ONF and ONL. Seeks to amend NFL-R12 as follows: NFL-R12 Mining activities and/or quarrying activities (excluding existing ~~farm quarries~~ quarrying activity) on or within Outstanding Natural Features or Landscapes [Refer to original submission for full relief sought]
299.197	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-R13 Intensive indoor primary production and intensive outdoor primary production within or	Oppose	Opposes NFL R13 in part. Considers the Rural Scenic Landscape overlay to be too extensive, and notes that while some land within the overlay is unsuitable for intensive primary production, other areas may be appropriate, particularly where land is already irrigated and developed.	Seeks to amend NFL-R13 from a non-complying activity status to restricted discretionary with the matters of discretion being the same as NFL-R10.
299.198	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-R14 Plantation Forestry on or within Outstanding Natural Features or Landscapes All	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain NFL-R14 as notified.
299.199	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-R15 Planting species that can result in wilding conifers on or within Outstanding Natural	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain NFL-R15 as notified.
299.200	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-R16 Intensive indoor primary production and intensive outdoor primary production on or wit	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain NFL-R16 as notified.

299.201	Twin Terraces Ltd & Cayuga Ltd	Natural Features and Landscapes	NFL-S1 Standards for colours of buildings and structures in landscapes Buildings and st	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain NFL-S1 as notified.
299.202	Twin Terraces Ltd & Cayuga Ltd	Public Access	PA-O1 Public and customary access Public and customary access is protected, maintained,	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain PA-O1 as notified.
299.203	Twin Terraces Ltd & Cayuga Ltd	Public Access	PA-O2 Provision of public access minimises adverse effects Public access to and along t	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain PA-O2 as notified.
299.204	Twin Terraces Ltd & Cayuga Ltd	Public Access	PA-P1 Activities that protect and maintain public and customary access Enable activitie	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain PA-P1 as notified.
299.205	Twin Terraces Ltd & Cayuga Ltd	Public Access	PA-P2 Mechanisms for improving public access Protect, maintain and enhance public acces	Oppose	Opposes PA-P2 in part. Considers the policy to be overly ambiguous in the absence of supporting rules, which may lead to arbitrary expectations for applicants to provide public access as a condition of land-use consent. Opposes encouraging public access through land-use applications and considers existing subdivision provisions sufficient to secure access where lawfully required. Notes that planners need clear and specific provisions to rely on, and that the policy is overly broad - particularly in point 1, which does not identify where public access is sought, the mechanisms to be used, or the nature of the access. Considers point 2 more targeted but still lacking sufficient specificity.	Amend PA-P2 as follows: Protect, maintain and enhance public access by: ~~1. encouraging opportunities and mechanisms to maintain and enhance public access when a land use application provides an opportunity for access; and~~ ~~2.~~ 1. requiring the creation of esplanade reserves and esplanade strips <u>where appropriate</u> in accordance with the Subdivision Chapter~~, with priority given~~ along the waterways listed in SCHED11 – Priority Areas for Public Access and Esplanade Strips, and lakes larger than 8 hectares.
299.206	Twin Terraces Ltd & Cayuga Ltd	Public Access	PA-P3 Consideration of adverse effects on public access When considering any applicatio	Support	Supports PA-P3 with modification. Notes that at present it simply refers to public access routes and access points which would include public access on private land. For example, the Alps to Ocean is public access through the goodwill of the land owners. Considers that it would be contrary to PA-O1 and PA-P1 aims of maintaining and enhancing public access to have regard to adverse effects on the Alps to Ocean because it may simply be easier for the land owner to stop public access to get consent.	Amend PA-P3 as follows: When considering any application for resource consents, have regard to any adverse effects of the proposed activity on public access routes and access points <u>on public land</u>.
299.207	Twin Terraces Ltd & Cayuga Ltd	Activities on the Surface of Water	General	Support	Supports the ASW chapter in general.	Retain ASW chapter as notified, except for submission points that follow.
299.208	Twin Terraces Ltd & Cayuga Ltd	Activities on the Surface of Water	ASW-P2 Commercial activities Provide for commercial surface water activities where it can	Support	Supports ASW-P2 with the definition for 'commercial activities' amended as submitted in the definitions chapter.	Seeks to redefine 'commercial activities' as submitted.
299.209	Twin Terraces Ltd & Cayuga Ltd	Activities on the Surface of Water	ASW-R1 Use of vessels for a recreational activity All zones Activity status: Permitted	Amend	Raises concern that ASW-R1 PER-2, which sets noise limits at a notional boundary, may create reverse-sensitivity effects for existing recreational lake uses as residential development increases around lakes. Considers that there should also be a	Amend ASW-R1 as follows: ...

					requirement for vessels to minimise disturbance to existing houses.	PER-2 The following noise limits are not exceeded at a notional boundary established prior to 1st March 2025: ...
299.210	Twin Terraces Ltd & Cayuga Ltd	Light	General	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain Lighting chapter as notified.
299.211	Twin Terraces Ltd & Cayuga Ltd	Noise	General	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain Noise chapter as notified.
299.212	Twin Terraces Ltd & Cayuga Ltd	Signs	General	Support	General support for the chapter.	Retain Sign chapter as notified, except for the submission points that follow.
299.213	Twin Terraces Ltd & Cayuga Ltd	Signs	SIGN-R7 Signs attached to a trailer, vehicle or vessel All zones Activity status: Non	Amend	Considers that SIGN-R7 is ambiguous and could lead to arbitrary decision-making. Notes uncertainty around how the primary use of a vehicle would be determined, what constitutes day-to-day business use, and whether company or fleet vehicles would be inherently considered incidental to that business. Considers the absence of a definition for “advertising sign” problematic, as many signs may be both informational and promotional. Suggests that vehicles parked at a usual place of residence or business should be excluded, but acknowledges this too is unclear under current wording. Notes that businesses may operate from a wide range of vehicle types beyond trucks and caravans, not limited to food vendors.	Amend SIGN-R7 as follows: Activity status: Non-Complying This rule does not apply to: 1. ~~an advertising~~ sign painted or adhered directly onto company/fleet vehicles or trailers ~~which is incidental to the primary use of that vehicle or trailer~~; or 2. an advertising sign painted or adhered directly onto company/fleet vehicles or trailers ~~which are used in the day-to-day operation of that business~~; or 3. businesses operating from a vehicle. ~~truck or caravan such as food vendors.~~
299.214	Twin Terraces Ltd & Cayuga Ltd	Temporary Activities	General	Support	Supports TEMP chapter with modification to remove the word 'light' from 'light aircraft' as this is not defined. Also refer to submission point on definitions chapter related to 'temporary activities'. [Refer to original submission for full reasons]	Seeks to replace ‘helicopter’ and ‘light aircraft’ with ‘aircraft' throughout the TEMP chapter.
299.215	Twin Terraces Ltd & Cayuga Ltd	Temporary Activities	TEMP-R6 Temporary helicopter and light aircraft take-offs and landings, excluding Ōamaru Airpo	Support	Considers that 'helicopter' and 'light aircraft' are not defined terms and should be replaced with 'aircraft' which is defined. [Refer to submission point on definitions chapter related to 'temporary activities']	Amend TEMP-R6 as follows: TEMP-R6 Temporary ~~helicopter and light~~ aircraft take-offs and landings, excluding Ōamaru Airport and Ōmārama Airfield ... PER-5 The following activities are exempt from the provisions of PER-1 to PER-4: 1. ~~helicopter and light~~ aircraft take offs and landings for

						emergencies by police, fire service, ambulance, or for search and rescue purposes; or 2. ~~helicopter and light~~ aircraft take off and landings associated with temporary military training activities; or 3. permitted primary production activities; or 4. ~~helicopter and light~~ aircraft take off and landings for the purposes of biosecurity or biodiversity control authorised by a statutory agency.
299.216	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-O1 Purpose of the General Rural Zone The General Rural Zone provides for primary p	Support	Supports GRUZ-O1. Support the purpose of the general rural zone for primary production and that the rural zone provides vital socio-economic benefits to the District.	Retain GRUZ-O1 as notified.
299.217	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-O2 Character of the General Rural Zone The character of the General Rural Zone rem	Support	Supports GRUZ-O2 while recognising that odours are managed by the regional council. Support that primary production contributes to open character and maintenance of rural landscapes, and that a degree of built form is necessary to support the ongoing productivity of the rural zone.	Retain GRUZ-O2 as notified.
299.218	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-O3 Highly productive land The value and long-term benefits of using highly product	Support	Supports GRUZ-O3. Considers that managing highly productive land is important to retain and support primary production in the rural environment, particularly where land is identified as being highly productive.	Retain GRUZ-O3 as notified.
299.219	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-O4 Rural amenity values A range of activities anticipated in the General Rural Zon	Support	Supports GRUZ-O4. Supports the recognition that rural zone land uses must remain compatible with primary production and that rural amenity values arising from good land-management practices should be maintained. Notes that clearer definition or guidance on rural amenity values would be beneficial, as interpretations vary - some may expect an “idyllic” and peaceful environment, whereas in practice rural amenity also includes machinery noise, long hours, animals, smoke, mud, and large buildings as well as open space, vegetation, low density, and quiet. Observes that the RMA definition of amenity values relies on subjective perceptions of pleasantness, aesthetic coherence, and cultural or recreational attributes, and that creating a new definition could introduce further ambiguity. [Refer to original submission for full reasons]	Seeks to define 'rural amenity values' as follows: <u>include; open space, primary production, low population and building density, pastoral and arable character interspersed with indigenous biodiversity, relative quietness compared to urban areas, and connection to land for cultural, recreational and historic reasons.</u>
299.220	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-O5 Business development in rural areas Rural areas are retained for primary produc	Support	Supports GRUZ-O5. Supports the objective recognising that some businesses compatible with primary production, and with a functional or operational need to locate in the rural zone, may be appropriate - particularly where they relate to primary production, the natural environment, or are otherwise associated with rural zone values.	Retain GRUZ-O5 as notified.
299.221	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-P1 Protection of highly productive land Protect highly productive land for use by	Support	Supports GRUZ-P1. Considers it important that identified highly productive land is protected for primary production.	Retain GRUZ-P1 as notified.

299.222	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-P2 Development in the General Rural Zone Maintain the rural character in the Gener	Support	Supports GRUZ-P2. Supports the general intent of the policy to maintain rural character in the General Rural Zone while allowing flexibility for ancillary activities that support primary production and permitted activities. Considers it important that provision is also made for existing lawfully established activities. Supports encouraging new indigenous planting where appropriate to offset or manage significant adverse effects. Notes that flexibility for ancillary living options is necessary, as family structures and primary production operations have varying residential needs. Supports enabling additional residential dwellings, including "granny flats," as per central government direction for smaller sites. However, recognises that the rural context differs, with larger sites needing to attract and retain quality staff. Notes that a large farm (e.g., 300ha dairy) may require multiple good-quality residences, and that many farms still lack adequate housing capacity. Considers that staff housing should not be assumed to be lower quality than other on-site residences and should be suitable for families. Considers that the plan should not encourage or imply lower-quality staff accommodation. [Refer to original submission for full reasons]	Amend GRUZ-P2 as follows: ... 4. encouraging the maintenance and enhancement of existing, and the planting of new, indigenous vegetation where appropriate; and 5. providing for conservation activities; and 6. recognising and providing for lawfully established rural activities and minimising reverse sensitivity effects on primary production and ancillary activities of new development in the General Rural Zone; and 7. providing for a ~~single~~ minor residential unit on sites to facilitate residential choice and flexibility ~~while ensuring that the minor residential unit is subservient to the principal residential unit on the site.~~ 8. providing for multiple residential units on large sites to facilitate staff accommodation while ensuring building density is appropriate for the General Rural Zone.
299.223	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-P3 Design of development in rural areas Ensure that new development is well design	Support	Supports GRUZ-P3. Support the policy intent to ensure new development is appropriate for the environment and buildings and structures are necessary to support primary production.	Retain GRUZ-P3 as notified.
299.224	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-P4 Maintenance of clear urban, rural lifestyle and rural areas Maintain a clear di	Support	Supports in part GRUZ-P4. Support the policy intent where there is a distinguishment of urban and rural environments but encourage flexibility for primary production activities on the fringe of the rural environments to flexibility where adverse effects can be appropriately managed.	Amend GRUZ-P4 as follows: Maintain a clear distinction between urban, rural lifestyle and rural areas through the use of clear land use zones and avoidance of ad-hoc subdivision where growth to Settlement or Rural Lifestyle zones has not been planned for unless the adverse effects can be avoided, remedied or mitigated.
299.225	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-P5 Intensive primary production Provide for intensive indoor primary production an	Support	Supports GRUZ-P5. Supports policy intent as it is important that provision is made for intensive primary production in the rural zone where effects can be appropriately managed.	Retain GRUZ-P5 as notified.
299.226	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-P6 Integration of primary production with natural and cultural values Recognise th	Support	Supports GRUZ-P6 with modification to clarify that the sensitive values don't extend to the entire GRUZ zone. Supports the policy intent that primary production is compatible with natural and cultural values within identified sensitive zones. Considers that specialist reports associated with these values should only be required within the overlays identified in the plan. Also considers that the policy should provide for new primary production activities.	Amend GRUZ-P6 as follows: Recognise the importance of the identified landscape, heritage, biodiversity and mana whenua values and provide for continued and new primary production in these areas while avoiding, remedying or mitigating any adverse effects on the values.
299.227	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-P7 Intensive primary production and extractive industries in close proximity to settlemen	Support	Supports GRUZ-P7. Supports the policy intent that any new primary production and extractive industries avoid adverse effects on existing settlements.	Retain GRUZ-P7 as notified.

299.228	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-P8 Energy and resource efficiency Encourage minimisation of energy and water use a	Support	Supports GRUZ-P8 in part. Supports the intent to promote energy and resource efficiency where appropriate, but notes that the Energy chapter lacks sufficient permissiveness to effectively implement the policy.	Amend GRUZ-P8 as follows: Encourage minimisation of energy and water use and the use of low impact design such as optimal site layout, passive solar design, solar power and water heating, and greywater recycling for any new development, where appropriate.
299.229	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-P9 Outline Development Plans Provide for any substantial development extension of	Support	Supports GRUZ-P9 with modification to clarify that recreational, heritage, and ecological values should be limited to those identified in the plan to avoid unnecessary reporting, and suggest using covenants or separation distances to manage adverse effects on new dwellings near the General Rural Zone. [Refer to original submission for full reasons]	Amend GRUZ-P9 as follows: ... b. contributes to a strong sense of place, and a coherent, functional and safe neighbourhood; and c. retains and supports the relationship to, and where possible enhances, identified recreational, heritage and ecological features and values; and d. is co-ordinated with the delivery of appropriate infrastructure; and e. achieves a high level of amenity; and f. specifies covenants and/or provides a sufficient separation distance of habitable buildings with the General Rural Zone to minimise the potential for reverse sensitivity effects.
299.230	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-R1 Building activity General Rural Zone Activity status: Permitted Where: PER-	Support	Supports GRUZ-R1. Supports the rule to provide for building activity in the rural zone and default to restricted discretionary where compliance cannot be achieved.	Retain GRUZ-R1 as notified.
299.231	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-R2 Primary production (excluding carbon forestry otherwise provided for in GRUZ-R18, mini	Support	Supports GRUZ R2 with protection for existing mining and quarrying activities in the General Rural Zone, unless this protection is provided for as submitted on in the Earthworks chapter. Supports primary production being provided for in the rural zone, noting that the GRUZ is the most appropriate zone for these important activities.	Amend GRUZ-R2 as follows: Primary production (excluding carbon forestry otherwise provided for in GRUZ-R18, new mining activity, new quarrying activities, new intensive indoor primary production and new intensive outdoor primary production)
299.232	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-R3 Amenity planting and shelterbelts General Rural Zone Activity status: Permitt	Support	Supports in part GRUZ-R3 with modifications to clarify that PER-1 may overly restrict amenity planting due to broad pest species criteria, and that PER-2 should regulate actual effects rather than speculative ones. [Refer to original submission for full reasons]	Amend GRUZ-R3 as follows: ... Where: PER-1 The amenity planting or shelterbelt does not involve planting of species that are~~, or can become,~~ pest species as identified in any Regional Pest Management Plan; and PER-2 The amenity planting ~~will~~ does not shade any existing adjoining residential unit between the hours of 9:00am and 4:00pm, or any formed public road between 10:00am and 2:00pm, on the shortest day of the year; and ...

299.233	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-R4 Residential activity General Rural Zone Activity status: Permitted Activity	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain GRUZ-R4 as notified.
299.234	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-R5 Residential unit General Rural Zone Activity status: Permitted Where: PER-1	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain GRUZ-R5 as notified.
299.235	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-R6 Accessory building General Rural Zone Activity status: Permitted Activity s	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain GRUZ-R6 as notified.
299.236	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-R7 Minor residential unit General Rural Zone Activity status: Permitted Where:	Support	Supports GRUZ-R7 in part, conditional on staff houses for larger farms being permitted by other means so that GRUZ-R7 only applies to smaller sites rather than large farms who need proper housing for families.	Retain GRUZ-R7 as notified.
299.237	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-R8 Visitor accommodation General Rural Zone Activity status: Permitted Where:	Support	Supports GRUZ-R8 with modification to better align the level of control with the potential for adverse effects. Notes that the five person limit appears intended to manage reverse sensitivity effects, but buildings often have capacity for up to ten people, which is more consistent with groups such as tour groups. [Refer to original submission for full reasons]	Amend GRUZ-R8 as follows: ... Where: PER-1 The visitor accommodation is limited to homestays accommodating no more than ~~5~~ 10 visitors at any one time; and ...
299.238	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-R9 Home business (excluding primary production activity) General Rural Zone Acti	Support	Supports GRUZ-R9 with modification to better encourage self-employment and entrepreneurial activity. Notes that in the rural zone neighbours are often too distant to be affected by home-business noise, visual effects, or traffic. Observes that some rural zones elsewhere (e.g., Auckland) do not impose gross floor area limits for home businesses, as effects are instead managed through other chapters - such as Noise, Light, Signs and through GRUZ-R9 PER-2, PER-3, and PER-4. Notes that rural buildings and accessory structures are commonly well screened, reducing potential visual impacts from storage or activities. Acknowledges that some home-business activities or storage may need to occur outdoors for functional or operational reasons, such as drying goods or parking large vehicles. Suggests considering whether SETZ-S10 outdoor-storage screening requirements should apply or whether similar wording should be incorporated into GRUZ-R9. Notes that not all home-business employees necessarily work at the home site where effects are being controlled. [Refer to original submission for full reasons]	Amend GRUZ-R9 as follows: Activity status: Permitted Where: ~~PER-1~~ ~~No more than 40m2 of the gross floor area of all buildings on the site is used for the home business; and~~ ~~PER-2~~ PER-1 No more than one full time employee, or equivalent, ~~engaged in~~ working at the site of the home business, resides off-site; and ~~PER-3~~ PER-2 No more than 2 heavy vehicle movements, and a total of 20 vehicle movements are generated in a 24-hour period for the home business; and ~~PER-4~~ PER-3 Any on-site storage of materials associated with the home

						business is undertaken within buildings on the site, or is screened to a height of at least 1.2m from adjoining roads and sites; and ~~PER-5~~ The manufacturing, altering, repairing, dismantling or processing of any goods, or articles associated with the home business, take place within a building or is screened to a height of at least 1.2m from adjoining roads and sites.
299.239	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-R10 Intensive indoor primary production and intensive outdoor primary production G	Support	Supports GRUZ-R10 with modification to avoid duplication of effluent consent requirements already managed by the Regional Council, and recommend aligning any remaining provisions with Regional Council's 150m notification threshold. [Refer to original submission for full reasons]	Amend GRUZ-R10 as follows: ... PER-2 1. housed pigs are located no closer than 500m to a property boundary; and ~~2. no disposal or storage of effluent within 500m of a residential unit on any other site; and~~ 3. no intensive indoor primary production or intensive outdoor primary production of pigs occurs within ~~2 kilometres~~ 150m of a Residential, Settlement, or Open Space Zone; or PER-3 1. no intensive indoor primary production or intensive outdoor primary production of poultry takes place within 100m of a property boundary; and ~~2. no disposal or storage of effluent within 500m of a residential unit on any other site; and~~ 3. no intensive indoor primary production or intensive outdoor primary production of poultry occurs within ~~2 kilometres~~ 150m of a Residential, Settlement or Open Space Zone; or PER-4 For intensive indoor primary production or intensive outdoor primary production of any other species, there is: ~~1. no disposal or storage of effluent within 500m of a residential unit on any other site; and~~ 2. a setback of at least ~~2 kilometres~~ 150m from a Residential, Settlement or Open Space Zone. ...
299.240	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-R11 Recreational activity General Rural Zone Activity status: Permitted Activi	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain GRUZ-R11 as notified.

299.241	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-R12 Flood protection structures General Rural Zone Activity status: Permitted	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain GRUZ-R12 as notified.
299.242	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-R13 Conservation activities General Rural Zone Activity status: Permitted Acti	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain GRUZ-R13 as notified.
299.243	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-R14 Commercial activity General Rural Zone Activity status: Permitted Where: P	Support	Supports GRUZ-R14 with modification. Considers that PER-1 could include primary produce from off-site to broaden farm-shop offerings without enabling wider retail. Suggests using "produce from primary production" rather than "farming produce" to include aquaculture and horticulture. Notes that forestry and quarrying produce are unlikely to be sold due to exclusion of further processing. Supports limiting goods to those produced within a 100-km radius to strengthen local supply and collaboration, improve consumer convenience, and support local producers. Notes that effects such as signage and transport are managed elsewhere, and rural character can be maintained by limiting retail activity to one building per site. [Refer to original submission for full reasons]	Amend GRUZ-R14 as follows: ... Where: PER-1 Retail sales are limited to: 1. food sourced from primary production activities within a 100km radius of the site ~~farming produce (including milk, fruit, vegetables, plants, flowers, or eggs) produced on the site, or honey processed on the site; or~~ ...
299.244	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-R15 Aeroplane airstrips and helicopter landing areas, and the use of these by aircraft	Oppose	Opposes in part GRUZ-R15. Considers that the aircraft movement limit should be increased to 32 per month for flexibility, and that no limit should apply where sufficient setbacks ensure there are no adverse effects at the nearest boundary. [Refer to original submission for full reasons]	Amend GRUZ-R15 as follows: ... PER-3 The use of the landing area or airstrip is for any other activity which results in no more than ~~8 aircraft movements per week (4 take-offs and 4 landings)~~ 32 aircraft movements per month; or PER-4 The airstrip is more than 1,000m from the nearest notional boundary under different ownership; or ~~PER-4~~ PER-5 Use for emergency landings, rescues, and firefighting; and ~~PER-5~~ PER-6 In relation to both PER-1 and PER-2, no take-off or landing approach path is over a Residential Zone, Rural Lifestyle Zone, or Settlement Zone. ...
299.245	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-R16 Papakāika within land held under Te Ture Whenua Māori Act 1993 or within a Native Res	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain GRUZ-R16 as notified.

299.246	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-R17 Seasonal Worker accommodation General Rural Zone Activity status: Permit	Oppose	Opposes GRUZ-R17. Notes that the seasonal worker accommodation rule risks encouraging low-quality or makeshift accommodation - such as converted sheds, relocatable units, and limited sanitary facilities. Supports recognising the need for seasonal worker accommodation to enable primary production during peak periods, but raises concern about restricting the number of kitchens, as higher-quality options often involve self-contained cabins or caravan-style units with their own cooking facilities. Considers that independent or communal kitchens do not generate additional adverse effects and that scale, occupancy, and setback controls already manage effects appropriately. Suggests the district plan should set higher standards for low-income worker accommodation, including potentially permitting more minor residential units. Opposes limits on building size, noting that larger shared facilities (e.g., shearing-quarters-style buildings) may be more appropriate. Considers that camping should not be encouraged as an acceptable form of worker accommodation, particularly for a workforce that often includes immigrants. [Refer to original submission for full reasons]	Amend GRUZ-R17 as follows: ... Where: PER-1 The minor residential unit or building ~~and/or any campsite~~ is only to be used by workers employed on the site; and PER-2 The seasonal worker accommodation is located on a site that is a minimum of 20ha; and ~~PER-3~~ ~~Any building is relocatable or able to be reconfigured to a building accessory to land-based primary production; and~~ ~~PER-4~~ ~~Any seasonal worker accommodation contains no more than one kitchen facility; and~~ ~~PER-5~~ ~~Any building used for seasonal worker accommodation is no more than 125m2 gross floor area; and~~ PER-6 Any building used for seasonal worker accommodation provides for a maximum of 10 occupants; and ~~PER-7~~ ~~The maximum area used for camping as part of any seasonal worker accommodation shall be 1000m2 and be located at least 100m from any residential unit on an adjoining site.~~ ...
299.247	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-R18 Carbon forestry General Rural Zone Activity status: Permitted Where: PER-1	Support	Supports GRUZ-R18 with modification to permit suitable indigenous species for carbon forestry, align setback rules with biodiversity provisions, correct wording around pest species, and remove unnecessary restrictions that conflict with broader plan objectives to enhance native biodiversity. [Refer to original submission for full reasons]	Amend GRUZ-R18 as follows: ... Activity status: Permitted Where:

						PER-1 The species of planting are indigenous ~~to the ecological district in which the activity is to take place~~; and ... PER-4 Afforestation must not occur— ... 3. within 30m of the boundary of land used for papakāika purposes or from a Residential, Settlement or Open Space Zone; ~~or~~ ~~4. within 10m of a Significant Natural Area~~; and PER-5 The carbon forestry activity ~~does not involve the planting~~ avoids an increase in scale or intensity of any pest, pest agent, or organism of interest identified in the relevant Regional Pest Management Plan; and ~~PER-6~~ ~~The carbon forestry utilises no more than 50% of any site.~~
299.248	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-R19 Rural Industry General Rural Zone Activity status: Restricted Discretion	Support	Supports GRUZ-R19 with more permissive settings to reflect the functional and operational needs of rural industries, noting that site design and infrastructure are developer decisions and that adverse effects are already managed through other chapters in the plan. [Refer to original submission for full reasons]	Amend GRUZ-R19 as follows: Activity status: ~~Restricted Discretionary~~Permitted Where: PER-1 The activity is not a potentially high-impact industrial activity. Note: consent may be required under the Transport chapter. ~~Matters of discretion are restricted to:~~ ~~1. the suitability of the location, site design and layout; and~~ ~~2. the intensity and scale of the activity; and~~ ~~3. the extent of adverse effects on existing or permitted activities; and~~ ~~4. the extent of adverse effects on the safe and efficient operation of the road network, and suitability of onsite loading, manoeuvring and access; and~~ ~~5. the provision of infrastructure to service the activity.~~

299.249	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-R20 Papakāika where not otherwise provided for under GRUZ-R16 General Rural Zone	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain GRUZ-R20 as notified.
299.250	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-R21 Community facility General Rural Zone Activity status: Discretionary Activ	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain GRUZ-R21 as notified.
299.251	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-R22 Industrial activity General Rural Zone Activity status: Discretionary Acti	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain GRUZ-R22 as notified.
299.252	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-R23 Any other activity not provided for as a permitted, restricted discretionary, non-com	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain GRUZ-R23 as notified.
299.253	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-R24 Retirement village General Rural Zone Activity status: Non-Complying Activ	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain GRUZ-R24 as notified.
299.254	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-R25 Educational facility General Rural Zone Activity status: Non-Complying Act	Oppose	Opposes GRUZ-R25. Notes that schools located in rural zones are typically rural in character themselves, meaning the risk of reverse sensitivity effects is low. Considers that access to education must be balanced with protection of primary production, and that a non-complying activity status does not reflect the importance of educational facilities in rural communities. [Refer to original submission for full reasons]	Seeks to amend the activity to a permitted activity with appropriate setbacks for buildings for the educational facility. Alternatively, amend to a restricted discretionary status - similar to the Timaru Proposed District Plan - allowing reverse sensitivity effects to be managed through matters of discretion. [Refer to original submission for full relief sought]
299.255	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-S1 Residential site density The maximum density of residential units on any site	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain GRUZ-S1 as notified.
299.256	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-S2 Maximum height All building and structures must not exceed a maximum height of	Support	Supports GRUZ-S2 with modification to reflect that grain silos can be up to 25m in height.	Amend GRUZ-S2 as follows: 1. All building and structures must not exceed a maximum height of: 1. 6m for any crop protection structure; 2. ~~15m~~ 25m for grain silos; 3. 10m for any other building ...
299.257	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-S3 Building coverage The building coverage for any site shall not exceed 20%. Rai	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain GRUZ-S3 as notified.
299.258	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-S4 Road and rail setbacks A stock loading ramp or race with its entry/exit point	Support	Supports GRUZ-S4 with modification to allow stock loading ramps angled to the road, provided there is at least 30m of space to accommodate full off-road parking and manoeuvring.	Amend GRUZ-S4 as follows: 1. A stock loading ramp or race with its entry/exit point located facing a road, including a State Highway, shall not be located

						within ~~a~~ 30m ~~setback~~ from the road boundary in the direction the loading ramp faces. 2. A stock loading ramp or race with its entry/exit point running parallel or away from ~~to~~ the road is exempt from this standard.
299.259	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-S5 Internal boundary setbacks The minimum setback of any part of a building or str	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain GRUZ-S5 as notified.
299.260	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-S6 Frontage fencing Any fencing within a road boundary setback or internal bounda	Support	Supports GRUZ-S6 with modification to exempt the curtilage of residential and minor residential units, allowing more residential-style fencing around homes while retaining appropriate rural fencing elsewhere in the zone.	Amend GRUZ-S6 as follows: 1. Any fencing within a road boundary setback or internal boundary setback shall be post and netting, post and wire, or post and rail fencing. 2. Fencing of residential units and minor residential units is exempt from this standard.
299.261	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-S7 Crop protection structures Dark green or black cloth is used for all vertical	Oppose	Opposes in part GRUZ-S7. Considers there should be justification for colour and size restrictions.	Seeks to delete GRUZ-S7, or provide evidence or justification for colour and size restrictions.
299.262	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-S8 Hours of operation Any activity (other than a residential activity or visitor	Support	Supports in part GRUZ-S8. Supports intent to limit hours for rural amenity protection but considers the matters of discretion should also address potential reverse sensitivity effects on primary production activities.	Amend GRUZ-S8 as follows: Matters of discretion are restricted to: ... 2. any adverse effects on the amenity values of properties on any adjoining residential sites; and 3. any reverse sensitivity effects on primary production.
299.263	Twin Terraces Ltd & Cayuga Ltd	General Rural Zone	GRUZ-S9 Servicing and firefighting water supply and access All new buildings must be c	Oppose	Opposes in part GRUZ-S9. Supports the intent of ensuring buildings are appropriately serviced but considers that provision should be made for alternative methods that still meet the purpose of the standard, particularly for buildings that do not require connection to services. Notes that many farm buildings and sheds do not contain sanitary fixtures and therefore do not need reticulated services, and that the current drafting could create unrealistic expectations for such structures.	Amend GRUZ-S9 as follows: 1. All new residential buildings must be connected to reticulated services where these are available; and 2. All new residential buildings must comply with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PA 4509:2008 unless written approval is provided from Fire and Emergency New Zealand regarding an alternative firefighting water supply.
299.264	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-O1 On-site transport facilities and access Use and development has safe and effective	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain TRAN-O1 as notified.
299.265	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-O2 High trip generating use and development The safety and efficiency of the transpor	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain TRAN-O2 as notified.

299.266	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-O3 Transport network The transport network is effective, accessible and integrated	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain TRAN-O3 as notified.
299.267	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-P1 High trip generating use and development Provide for high vehicle trip generato	Support	Supports TRAN-P1 with modification to clarify the term 'surrounding area' in Point 5, as it is currently vague and may lead to inconsistent interpretation.	Amend TRAN-P1 as follows: ... 5. the effect of the proposed activity on the character and amenity values of ~~the surrounding area~~ adjoining sites; and ...
299.268	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-P2 Appropriate on-site transport facilities Enable on-site transport facilities where	Oppose	Opposes TRAN-P2. Notes that the safe and efficient use of a site is an internal matter, typically governed by industry standards and determined by the landowner. Considers that, consistent with TRAN-O1, TRAN-P2 should only address activities that generate effects beyond the site boundary—specifically those that could compromise the safety and efficiency of the wider transport network. Notes that on-site transport facilities are unrelated to the active-transport network, and that encouraging pedestrian or cycling access within areas designed for light or heavy vehicle movements may increase health and safety risks.	Amend TRAN-P2 as follows: Enable on-site transport facilities where these: 1. meet industry standards; and 2. are of a location and design that provides for: a. public health and safety; and ~~b. the safe and efficient use of the site; and~~ c. the safe and efficient functioning of the transport network; and d. the reasonable loading and access demands generated by the use of the site; and e. the safe and effective access for firefighting purposes. ~~3. promote the uptake and use of the active transport network.~~
299.269	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-P3 Potentially appropriate on-site transport facilities Only allow for on-site tra	Oppose	Opposes TRAN-P3. Considers it is unnecessary, as relevant matters are already addressed elsewhere to the extent they relate to effects beyond the site. Considers that firefighting access should be added to TRAN-P3 and the remainder of the policy deleted. If the policy is retained, points that relate only to internal on-site effects should be removed.	Add firefighting access and delete the remainder of TRAN-P3. If TRAN-P3 is retained, amend it as follows: Only allow for on-site transport facilities that do not meet industry standards where it can be demonstrated, if applicable, that: ~~1. the design is in response to site and/or topographical constraints; and~~ ... [Refer to original submission for full relief sought]
299.270	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-P4 Vehicle crossings Provide for safe and efficient connections between the transp	Support	Supports TRAN-P4 to the extent that it applies to new vehicle crossings.	Amend TRAN-P4 as follows: Provide for safe and efficient connections between the transport network and on-site transport facilities by requiring new vehicle crossings to roads to address: ...

299.271	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-P5 Regionally Significant Infrastructure Recognise the social, economic, cultural	Support	Supports TRAN-P5, particularly the definition of Regionally Significant Infrastructure.	Retain TRAN-P5 as notified.
299.272	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-P6 Multi-modal and active transport Encourage activities to incorporate opportunitie	Oppose	Opposes TRAN-P6. Considers to be overly strong in wording and that cycling/pedestrian modes are more hazardous and should not be encouraged where full cycling infrastructure is not available.	Amend TRAN-P6 as follows: ~~Encourage~~ Promote activities to incorporate opportunities for multi-modal and active transport, including cycle parking and end of trip facilities if the site is served by the active transport network where it separates cyclists and pedestrians.
299.273	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-P8 Upgrading of the transport network Provide for the upgrading or development of	Support	Supports TRAN-P8 with modification. Considers clearer guidance needed on when to respond to earthworks effects, suggesting the policy be limited to landscape and ecological values identified in overlays and chapters of the plan.	Amend TRAN-P8 as follows: ... 8. responds to site and topographical constraints including opportunities to reduce the effects of earthworks on identified landscape and ecological values; ...
299.274	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-P9 Roads as infrastructure corridors Encourage the use of roads as infrastructure	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain TRAN-P9 as notified.
299.275	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-P10 Road classification Classify roads according to their function and anticipated	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain TRAN-P10 as notified.
299.276	Twin Terraces Ltd & Cayuga Ltd	Transport	General	Oppose	Considers that rural zones should be exempt from policies that may pressure developers to fund cycle and footpaths where they offer no practical benefit and seeks clarification that policies apply only to new activities, noting that technical evidence from the WDC roading department is needed to support provisions for road crossings. [Refer to original submission for full reasons]	Seeks to have this submission point considered across all TRAN provisions and for the roading department to reply to this submission at further hearings commenting on the TRAN chapter overall. [Refer to original submission for full relief sought]
299.277	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-R1 Vehicle crossings onto roads All zones Activity status: Permitted Where: PE	Support	Supports TRAN-R1 subject to previous submission point [299.276].	Amend TRAN-R1 as follows: TRAN-R1 New Vehicle crossings onto roads ...
299.278	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-R2 Site access for activities without any on-site vehicle parking space or loading spaces	Support	Supports TRAN-R2 with modifications to clarify that pedestrian and cycling access requirements should not apply in zones where vehicle travel is operationally necessary, such as due to distance.	Amend TRAN-R2 as follows: TRAN-R2 Site access for new activities without any on-site vehicle parking space or loading spaces

						... PER-1 All of the following standards are complied with where relevant: 1. TRAN-S1 Pedestrian and cycling access in Residential Zones; 2. TRAN-S2 Firefighting access
299.279	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-R3 On-site parking, loading, and access All zones Activity status: Permitted W	Oppose	Opposes TRAN-R3. Considers the provision overregulates internal site effects unrelated to the transport network, particularly dairy lanes and private access already covered under TRAN-S3, and finds TRAN-S5 overly restrictive by limiting vehicle standing, queuing, and manoeuvring within a site that are inherent and internal and should not be subject to standards. [Refer to original submission for full reasons]	Seeks the deletion of TRAN-R3. Alternatively, if retained sees to amend as follows: All zones except Rural Lifestyle Zone, General Rural Zone, Macraes Mining Zone and Settlement Zone. PER-1 All of the following standards are complied with where relevant; 1. TRAN-S2 Firefighting access; ~~2. TRAN-S3 Service lanes, private ways, private roads, pedestrian accessways and walkways;~~ ~~3. TRAN-S4 Reverse manoeuvring;~~ ~~4. TRAN-S5 Design standards for vehicle manoeuvring areas;~~ 5. TRAN-S6 Service stations and truck stops; ~~6. TRAN-S7 On-site loading spaces for non-residential activities;~~ ~~7. TRAN-S8 Design requirements for loading and vehicle standing spaces;~~ 8. TRAN-S9 Accessible parking spaces; ~~9. TRAN-S10 Design requirements for on-site vehicle parking spaces;~~ ~~10. TRAN-S11 Surface of parking and loading areas;~~ ~~11. TRAN-S12 On-site cycle parking.~~ ... Matters of discretion are restricted to: 1. the matters of discretion listed in any of the standards TRAN-S2, ~~TRAN-S3, TRAN-S4, TRAN-S5,~~ TRAN-S6, ~~TRAN-S7, TRAN-S8,~~ TRAN-S9, ~~TRAN-S10, TRAN-S11, and/or TRAN-S12~~ that are not complied with.
299.280	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-S9 Accessible parking spaces Where parking spaces are provided on site: any on-si	Support	Supports TRAN-S9 subject to submission(s) from disability advocate organisations, particularly regarding application to rural zones.	Retain TRAN-S9 with any amendments requested by disability advocate organisations and disabled people.
299.281	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-S10 Design requirements for on-site vehicle parking spaces Where parking spaces ar	Oppose	Opposes TRAN-S10. Considers the standard imposes design requirements that are unclear or unsuitable for rural and residential contexts and regulates internal site effects inconsistent with TRAN-O1.	Amend TRAN-S10 as follows: TRAN-S10 Design requirements for commercial or industrial on-site vehicle parking spaces Where parking spaces are provided on a site: 1. car parking must comply with the requirements of [provide

						standard here] ~~AS 2890.1:2004 Parking facilities Part 1: Off-street car parking~~, except for: a. a parking space in a garage or carport; or b. staff parking that is provided as stacked parking of no more than two vehicles, or c. parking for residential or primary production activity.
299.282	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-S11 Surface of parking and loading areas The surface of all parking and loading a	Oppose	Opposes TRAN-S11. Considers that setting a low car park threshold would place undue burden on rural zones, and that regulating internal site effects is inconsistent with TRAN-O1. Considers that limiting to one residential unit is inconsistent with the permitted pathways for minor residential units and multiple units on a site for staff accommodation.	Seeks to delete TRAN-S11, or include it as an advice note. Alternatively if it is to be retained, amend to clarify when it applies. [Refer to original submission for full relief sought]
299.283	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-S12 On-site cycle parking All developments, excluding residential units and prima	Amend	Notes TRAN-S12 excludes primary production but should exclude rural zones entirely due to long distances, high speed limits, and lack of cycleways. Considers the standard overly prescriptive and potentially unsafe in rural contexts. [Refer to original submission for full reasons]	Seeks to delete TRAN-S12. Alternatively if it is to be retained, amend to clarify when it applies. [Refer to original submission for full relief sought]
299.284	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-S12 On-site cycle parking All developments, excluding residential units and prima	Oppose	Notes TRAN-S12 excludes primary production but should exclude rural zones entirely due to long distances, high speed limits, and lack of cycleways. Considers the standard overly prescriptive and potentially unsafe in rural contexts. [Refer to original submission for full reasons]	Seeks to delete TRAN-S12. Alternatively if it is to be retained, amend to clarify when it applies. [Refer to original submission for full relief sought]
299.285	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-R3 On-site parking, loading, and access All zones Activity status: Permitted W	Oppose	Opposes incorporating Australian and New Zealand Standards by reference in the district plan due to their cost, copyright restrictions, external review processes, and inefficiency and considers the PDP should include locally specified standards to avoid financial barriers and regulatory outsourcing. [Refer to original submission for full reasons]	Seeks to use standards acceptable to the WDC roading department which are written into the plan to be freely available. Seeks the deletion of TRAN-R3. Alternatively, if retained seeks to amend as follows: All zones except Rural Lifestyle Zone, General Rural Zone, Macraes Mining Zone and Settlement Zone. PER-1 All of the following standards are complied with where relevant; 1. TRAN-S2 Firefighting access; ~~2. TRAN-S3 Service lanes, private ways, private roads, pedestrian accessways and walkways;~~ ~~3. TRAN-S4 Reverse manoeuvring;~~ ~~4. TRAN-S5 Design standards for vehicle manoeuvring areas;~~ 5. TRAN-S6 Service stations and truck stops; ~~6. TRAN-S7 On-site loading spaces for non-residential activities;~~ ~~7. TRAN-S8 Design requirements for loading and vehicle standing spaces;~~

						8. TRAN-S9 Accessible parking spaces; ~~9. TRAN-S10 Design requirements for on-site vehicle parking spaces;~~ ~~10. TRAN-S11 Surface of parking and loading areas;~~ ~~11. TRAN-S12 On-site cycle parking.~~ ... Matters of discretion are restricted to: 1. the matters of discretion listed in any of the standards TRAN-S2, ~~TRAN-S3, TRAN-S4, TRAN-S5,~~ TRAN-S6, ~~TRAN-S7, TRAN-S8,~~ TRAN-S9, ~~TRAN-S10, TRAN-S11, and/or TRAN-S12~~ that are not complied with.
299.286	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-R4 Vehicle trip generating activities All zones Activity status: Permitted Whe	Support	Supports TRAN-R4 subject to changes as submitted later in the document to reduce the consent threshold and maybe control the activity directly with number of traffic movements as in other parts of the plan rather than use proxies such as gross floor area.	Retain TRAN-R4 as notified with changes to Table 6 - High Trip Generator Thresholds.
299.287	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-R5 Walkways, cycleways and shared paths which are located on public land other than a roa	Support	Supports TRAN-R5 and associated permitted activity standard TRAN-S20 subject to the replacement of the Austroads Guide with a specific standard to ensure oversight of future changes is under WDC control.	Retain TRAN-R5 as notified with changes to TRAN-S20.
299.288	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-R6 Extensions and new vehicle access tracks ancillary to infrastructure, outside of any o	Support	Supports TRAN-R6 with modification to apply within overlays as extensive coverage of the Rural Scenic and Outstanding Natural Landscapes overlays makes it overly restrictive if excluded, and considers infrastructure access should take precedence over overlay values without requiring consent or incurring additional costs.	Amend TRAN-R6 as follows: TRAN-R6 Extensions and new vehicle access tracks ancillary to infrastructure~~, outside of any overlay~~
299.289	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-S3 Service lanes, private ways, private roads, pedestrian accessways and walkways	Support	Supports TRAN-S3 if restricted to public ways only and specifies a standard rather than requiring purchase of an external standard.	Amend TRAN-S3 as follows: TRAN-S3 Service lanes, ~~private ways, private roads,~~ pedestrian accessways and walkways <u>on public land</u>. 1. Service lanes, ~~private ways, private roads,~~ pedestrian accessways and walkways <u>on public land</u> must be designed and constructed in accordance with <u>[describe standards here]</u> ~~NZS 4404:2010 Land Development and Subdivision Infrastructure; except where Table 7 – Minimum legal widths and formation requirements for private ways/vehicle access lots replaces the formation requirements of private ways for residential units detailed in NZS 4404:2010.~~
299.290	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-S5 Design standards for vehicle manoeuvring areas Areas must be provided on a sit	Oppose	Opposes TRAN-S5. Considers the standard overly restrictive by requiring all vehicle standing, queuing, and manoeuvring to occur entirely within a site, including areas inherently used for such purposes, making on-street parking non-compliant and imposing internal site controls unrelated to TRAN-O1. [Refer to original submission for full reasons]	Seeks to delete TRAN-S5. Alternatively if the standard is retained seeks to amend as follows: 1. Areas must be provided on a site for vehicles to stand, queue and make all necessary manoeuvres on site without using the

						road or State Highway~~, and without using the area provided for parking space, servicing, loading space or outdoor storage purposes~~; and ... Matters of discretion are restricted to: 1. the safety and movement of pedestrians, cyclists, public transport and general traffic on the road corridor.
299.291	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-S7 On-site loading spaces for non-residential activities The number of loading sp	Oppose	Opposes TRAN-S7. Considers the standard inappropriate for rural contexts and that it imposes unnecessary discretion over loading needs best determined by the operator. Also considers that it relies on outdated and inaccessible standards and should instead include explicit standards within the plan.	Seeks to delete the standard. Alternatively if TRAN-S7 must be retained seeks to amend as follows: 1. The number of loading spaces for any non-residential activity must not be less than that shown in Table 8 – Minimum loading space requirements for non-residential activities below and must be provided on-site, except in the Town Centre Zone and rural zones. ... 3. Neither Clause 1 or 2 above apply to sites of less than 50m2 that are used for infrastructure purposes, or to primary production. Matters of discretion are restricted to: 1. the effective, efficient and safe operation of the transport network; and ~~2. the identified loading needs of the activity.~~
299.292	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-S8 Design requirements for loading spaces and vehicle standing spaces Loading spa	Oppose	Opposes TRAN-S8. Considers the standard inappropriate for rural contexts and that it imposes unnecessary discretion over loading needs best determined by the operator. Also considers that it relies on outdated and inaccessible standards and should instead include explicit standards within the plan.	Seeks to delete TRAN-S8. Alternatively if the standard is retained, seeks to amend as follows: 1. Loading spaces and vehicle standing spaces required under TRAN-S5 must be designed, constructed and maintained in accordance with [produce a specific standard in the text here].~~AS 2890.2.2002 Parking facilities Part 2: Off-street commercial vehicle facilities~~, for the specified minimum design vehicle. Matters of discretion are restricted to:

						1. the effective, efficient and safe operation of the transport network; and ~~2. the identified loading and vehicle space needs of the activity.~~
299.293	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-S9 Accessible parking spaces Where parking spaces are provided on site: any on-si	Support	Supports TRAN-S9 subject to submission(s) from disability advocate organisations, particularly regarding application to rural zones.	Retain with any amendments requested by disability advocate organisations and disabled people.
299.294	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-S10 Design requirements for on-site vehicle parking spaces Where parking spaces ar	Oppose	Opposes TRAN-S10. Considers the standard imposes design requirements that are unclear or unsuitable for rural and residential contexts and regulates internal site effects inconsistent with TRAN-O1.	Amend TRAN-S10 as follows: TRAN-S10 Design requirements for <u>commercial or industrial</u> on-site vehicle parking spaces Where parking spaces are provided on a site: 1. car parking must comply with the requirements of <u>[provide standard here]</u> ~~AS 2890.1:2004 Parking facilities Part 1: Off-street car parking~~, except for: a. a parking space in a garage or carport; <u>or</u> b. staff parking that is provided as stacked parking of no more than two vehicles<u>, or</u> <u>c. parking for residential or primary production activity.</u>
299.295	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-S11 Surface of parking and loading areas The surface of all parking and loading a	Oppose	Opposes TRAN-S11. Considers the standard imposes unnecessarily low thresholds and surface requirements on parking and loading areas in rural and residential zones, regulates internal site effects inconsistent with TRAN-O1, and conflicts with permitted pathways for multiple residential units.	Seeks to delete TRAN-S11 or include it as an advice note. Alternatively if it is retained seeks to amend as follows: 1. The surface of ~~all~~ parking and loading areas must either be: ... 2. Clause 1 does not apply where a site contains parking for ~~one~~ residential unit<u>s or primary production activity</u>.
299.296	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-S12 On-site cycle parking All developments, excluding residential units and prima	Oppose	Considers the standard inappropriately applies cycle parking requirements in rural areas where cycling is impractical and potentially unsafe, and is overly prescriptive in its design standards.	Seeks to delete TRAN-S12. Alternatively, seeks to amend as follows: 1. All developments, excluding residential units and primary production, ~~must~~ <u>should</u> provide cycle parking at a rate of 1 cycle parking for every 10 car parking spaces provided; and 2. cycle parking ~~must~~ <u>should</u> meet the following minimum specifications: a. cycle parking facilities ~~must~~ <u>should</u> be: i. signposted or visible to cyclists entering the site; and ~~ii. located as close as possible to, and no more than 15m from at least one main pedestrian public entrance to the building/activity; and~~ iii. located so they do not impede pedestrian thoroughfares, including areas used by people whose mobility or vision is restricted; and iv. clear of vehicle parking or manoeuvring areas; ~~b. cycle parking facilities must be available during the activity's~~

						~~hours of operation and must not be impeded by any structure, storage of goods, landscape planting or other use; and~~ ~~c. long stay cycle parking facilities (for staff or residents) must be located:~~ ~~i. in a covered area; and~~ ~~ii. in an area where access by the general public is generally excluded.~~ ~~Note: Refer to the Austroads Bicycle Parking Facilities: Guidelines for design and installation: October 2-16 (AP-R527-16).~~ Matters of discretion are restricted to: ... 4. whether cycling is a safe method of transport to the site.
299.297	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-S13 Width and number of vehicle crossings onto roads Every lot with direct vehicl	Support	Supports subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
299.298	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-S14 Formation and sealing of vehicle crossings All vehicle crossings onto a seale	Support	Supports subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
299.299	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-S15 Distance between vehicle crossings and road intersections the distance betwee	Support	Supports subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
299.300	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-S16 Sight distances from vehicle crossings Any vehicle crossing onto a road other	Support	Supports subject to advice from the WDC roading engineers.	Seeks to retain subject to roading department advice.
299.301	Twin Terraces Ltd & Cayuga Ltd	Transport	Table 6 – High trip generator thresholds	Support	Supports Table 6 with modification to raise the lower limits, as considers there is no technical evidence supporting the current thresholds and managing effects through vehicle movements is more appropriate. Also considers that valuable services such as emergency, healthcare, education, recreation, and community facilities should be given higher permitted thresholds to reduce consent barriers and better reflect their social importance. [Refer to original submission for full reasons]	Seeks to incorporate management of the effects from publicly owned or funded educational facilities managed by TRAN-R8 when a road needs upgraded to meet effects from an exceeded threshold. Also seeks to amend Table 6. [Refer to original submission for full relief sought]
299.302	Twin Terraces Ltd & Cayuga Ltd	Transport	Table 7 – Minimum legal widths and formation requirements for private ways/access lots	Oppose	Opposes Table 7. Considers the table unnecessarily duplicates TRAN-S2 by applying minimum legal widths and formation requirements to private ways, manages only internal site effects, and relies on inaccessible standards without supporting technical evidence.	Amend Table 7 as follows: Table 7 – Minimum legal widths and formation requirements for ~~private ways/~~access lots
299.303	Twin Terraces Ltd & Cayuga Ltd	Energy	General	Oppose	Considers that the chapter does not adequately reflect the benefits and low environmental impact of renewable energy and places excessive consent burdens on activities that should be	Seeks for the chapter to reflect the benefits and low environmental impact of renewable energy and to reduce consent burdens on these activities [Inferred relief requested].

					encouraged, especially those generating electricity at the point of consumption to reduce demand on large-scale infrastructure.	
299.304	Twin Terraces Ltd & Cayuga Ltd	Energy	ENG-O1 Recognising the benefits of renewable electricity generation The significant local,	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ENG-O1 as notified.
299.305	Twin Terraces Ltd & Cayuga Ltd	Energy	ENG-O2 Design and location of renewable electricity generation Renewable electricity ge	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ENG-O2 as notified.
299.306	Twin Terraces Ltd & Cayuga Ltd	Energy	ENG-O3 Protecting the values and qualities of any overlay Waitaki District's overlays a	Oppose	Opposes ENG-O3. Considers that not all overlays are equal and not all renewable energy methods are equal.	Amend ENG-O3 as follows: ENG-O3 Protecting the values and qualities of ~~any~~ overlay Waitaki District's overlays are protected as far as practicable from ~~the~~ any significant adverse effects of renewable electricity generation activities.
299.307	Twin Terraces Ltd & Cayuga Ltd	Energy	ENG-P1 Recognising the benefits of renewable electricity generation Recognise the local, r	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ENG-P1 as notified.
299.308	Twin Terraces Ltd & Cayuga Ltd	Energy	ENG-P2 Existing activities Enable the ongoing refurbishment, maintenance and repair, an	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ENG-P2 as notified.
299.309	Twin Terraces Ltd & Cayuga Ltd	Energy	ENG-P3 Effects on renewable electricity generation activities Only allow new sensitive act	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ENG-P3 as notified.
299.310	Twin Terraces Ltd & Cayuga Ltd	Planning Maps	General	Support	Supports the Otago Flood Assessment. Considers that this model appears to overestimate areas that may flood compared to the GNS geomorphology report. [Refer to original submission for full reasons]	Seeks for a review of the Otago Flood Plain overlay mapping.
299.311	Twin Terraces Ltd & Cayuga Ltd	Energy	ENG-P4 Small scale renewable electricity generation activities and investigation activities ou	Support	Supports ENG-P4 with modifications to also enable small scale renewable electricity generation activities within overlays, particularly extensive overlays such as ONL and RSL where entire properties are affected. Considers energy-related overlays (e.g., National Grid yard, Waitaki Power Scheme) should not restrict renewable energy generation and that natural hazard overlays are generally irrelevant to renewable energy effects beyond structural limitations. Considers small-scale renewable energy generation should be enabled across all overlays, with large-scale activities controlled only within identified overlays. Also considers that the	Amend ENG-P4 as follows: ENG-P4 Small scale renewable electricity generation activities and investigation activities ~~outside of overlays~~ ~~Enable~~ Recognise and provide for small scale renewable electricity generation activities and activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation activities~~,~~ ~~where:~~ ~~1. it is of a form, location and scale that minimises adverse effects~~

					PDP should "recognise and provide for" small-scale renewable electricity generation to align with the NPS-REG. [Refer to original submission for full reasons]	~~on the environment; and~~ ~~2. it is consistent with the anticipated amenity values and character of the zone; and~~ ~~3. where it is demonstrated that all adverse effects on an overlay cannot be avoided, it appropriately offsets or compensates the adverse effects.~~
299.312	Twin Terraces Ltd & Cayuga Ltd	Energy	ENG-P5 Small scale renewable electricity generation activities and investigation activities in	Oppose	Opposes ENG-P5. Considers that small-scale renewable energy generation should be provided for in accordance with the NPS-REG as effects are minor and existing overlay chapters already manage structural impacts. Considers that discouraging such activities may lead to greater reliance on large-scale projects with more significant effects.	Seeks to delete the policy. Alternatively if the policy is kept, seeks to amend as follows: ~~Only allow~~ Recognise and provide for small scale renewable electricity generation activities and activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation activities within an overlay where: 1. if located on buildings, items and sites identified in SCHED2 – Historic Heritage Items, SCHED3 – Character Contributing Buildings and non-contributing buildings where the building is a character contributing building, and SCHED5 – Sites and Areas of Significance to Māori: a. its location is sympathetic to the identified values where practicable; and b. ~~any structure is not visible from any adjoining public place and~~ where practicable, is aligned with the plane of the roof where located on a roof; 2. if located within the root protection area of a tree identified in SCHED4 - Notable Trees, the work will not likely compromise the long-term health, natural life or values of the Notable Tree; ... c. the design and location of the activity is subordinate to and does not compromise the identified characteristics and values of the Outstanding Natural Feature or Landscape~~; and~~ ~~5. it is demonstrated that all adverse effects on the values of the relevant overlay cannot be avoided, it appropriately offsets or compensates the adverse effects.~~
299.313	Twin Terraces Ltd & Cayuga Ltd	Energy	ENG-P6 Large scale renewable electricity generation activities Provide for large scale	Support	Supports ENG-P6. Considers that large scale activities have more significant effects and it is appropriate to manage them.	Retain ENG-P6 as notified.
299.314	Twin Terraces Ltd & Cayuga Ltd	Energy	ENG-P7 Large scale renewable electricity generation activities in other zones and within overl	Support	Supports ENG-P7. Considers that large scale activities have more significant effects and it is appropriate to manage them.	Retain ENG-P7 as notified.
299.315	Twin Terraces Ltd & Cayuga Ltd	Energy	ENG-P8 New technology Recognise the opportunity for new technology in renewable electri	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ENG-P8 as notified.

299.316	Twin Terraces Ltd & Cayuga Ltd	Energy	ENG-P9 Decommissioning of renewable electricity generation activities Require that, during	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ENG-P9 as notified.
299.317	Twin Terraces Ltd & Cayuga Ltd	Energy	ENG-R1 The operation, maintenance, and refurbishment of existing renewable electricity generat	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ENG-R1 as notified.
299.318	Twin Terraces Ltd & Cayuga Ltd	Energy	ENG-R2 The operation, maintenance, and refurbishment of existing renewable electricity generat	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ENG-R2 as notified.
299.319	Twin Terraces Ltd & Cayuga Ltd	Energy	ENG-R3 Small scale renewable electricity generation activities outside of an overlay Al	Support	Supports ENG-R3 but considers that it should also apply within overlays subject to the provisions of the relevant chapter in that overlay.	Amend ENG-R3 as follows: ENG-R3 Small scale renewable electricity generation activities ~~outside of an overlay~~
299.320	Twin Terraces Ltd & Cayuga Ltd	Energy	ENG-R4 Investigation activities outside of an overlay All zones Activity status: Perm	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ENG-R4 as notified.
299.321	Twin Terraces Ltd & Cayuga Ltd	Energy	ENG-R5 Small scale renewable electricity generation activities and investigation activities in	Oppose	Opposes ENG-R5. Considers small-scale renewable generation should be permitted activities as they are low impact and a restricted discretionary status adds disproportionate costs that discourage such activities and conflict with the NPS-REG.	Seeks to delete the rule and manage with ENG-R3. Alternatively, if ENG-R5 is not deleted seeks to amend it as follows to a controlled activity: Activity status: ~~Restricted Discretionary~~ Controlled Where: ~~RDIS-1~~ CON-1 The activity is located: ... ~~RDIS-2~~ CON-2 If the activity is located within an area ... ~~RDIS-3~~

						CON-3 The activity is located within a Natural Hazard Overlay or Coastal Natural Hazard Overlay; and ~~RDIS-4~~ CON-4 Investigation activities comply with ENG-S5 Renewable energy generation investigation activities. Matters of ~~discretion~~ control are restricted to: 1. the benefits arising; and 2. any mitigation, offset or compensation measures offered; and 3. the location, size, colour and reflectivity of any structure; and 4. any significant adverse effects on the amenity values of adjoining properties; and 5. any health and safety effects, including noise; and 6. any significant adverse effects on any identified item, building, site, feature, landscape, or area; and 7. any significant adverse effects on the identified values and qualities of any item, building, site, feature, landscape or area; and ... Activity status when compliance is not achieved: ~~Non-Complying~~ Restricted Discretionary Where: ~~NC-1~~ RDIS-1 Compliance is not achieved with ~~RDIS-2~~ CON-2 and/or ~~RDIS-4~~ CON-4
299.322	Twin Terraces Ltd & Cayuga Ltd	Energy	ENG-R6 Small scale renewable electricity generation activities and investigation activities wi	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ENG-R6 as notified.
299.323	Twin Terraces Ltd & Cayuga Ltd	Energy	ENG-R7 Large scale renewable electricity generation activities General Rural Zone Act	Oppose	Opposes ENG-R7. Considers that renewable energy as a non-complying activity across overlays contradicts the NPS-REG, especially where overlays are intended for energy generation, and given that adverse effects are already managed by other chapters, the activity should be [restricted] discretionary.	Amend ENG-R7 as follows: Activity status: Restricted Discretionary Where: RDIS-1 NZS 6808:2010 Acoustics – Wind farm noise is complied with for any proposal involving wind generation; and

						RDIS-2 The activity is not located within an overlay. Activity status when compliance is not achieved: Discretionary ~~Non-Complying~~ Where: ~~NC-1~~ DIS-1 Compliance is not achieved with RDIS-1 and/or RDIS-2
299.324	Twin Terraces Ltd & Cayuga Ltd	Energy	ENG-R8 Other renewable electricity generation activities not otherwise provided for All	Oppose	Opposes ENG-R8. Considers the rule is unclear in scope and appears to pre-emptively control assumed future effects without justification and this will discourage innovation and renewable energy generation contrary to the NPS-REG. Considers any necessary controls should be addressed in relevant chapters only when actual effects are known.	Seeks to delete ENG-R8 and manage the effects within the relevant zone or overlay chapter. To fully encourage innovation in renewable energy, seeks to make any changes needed once the effects are known via plan review or plan change.
299.325	Twin Terraces Ltd & Cayuga Ltd	Energy	ENG-S1 Small scale solar panels All zones The panel must not exceed the permitted bu	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ENG-S1 as notified.
299.326	Twin Terraces Ltd & Cayuga Ltd	Energy	ENG-S2 Small scale roof mounted wind turbines All zones The turbine (including the f	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ENG-S2 as notified.
299.327	Twin Terraces Ltd & Cayuga Ltd	Energy	ENG-S3 Small scale freestanding wind turbines General Rural Zone Special Purpose Zo	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ENG-S3 as notified.
299.328	Twin Terraces Ltd & Cayuga Ltd	Energy	ENG-S4 Small scale hydro generators General Rural Zone Rural Lifestyle Zone Industr	Support	Supports ENG-S4 with modifications. Considers the 200m^2 limit is too restrictive for stored water and the dam height is better regulated under the Dam Safety Regulations 2022. Considers the matters of discretion vague, such as 'suitability of the site' and lack clarity and justification, especially when many dams relate to existing water bodies or irrigation systems.	Amend ENG-S4 as follows: 1. The maximum surface area of any stored water solely for hydro electricity does not exceed 200m2; and 2. the maximum height of a weir or dam solely for hydro electricity does not exceed 2m; and 3. the maximum installed capacity does not exceed 4 megawatts (MW). Matters of discretion are restricted to: ... ~~3. the suitability of the site for the proposed activity; and~~ ...

299.329	Twin Terraces Ltd & Cayuga Ltd	Earthworks	EW(Q)-S2 Setback from a site boundary General Rural Zone Special Purpose Zone – Macra	Support	Supports EW(Q)-S2 with modification for consistency. Considers a setback of 100m from neighbouring properties for farm quarries is excessive given other plan requirements regarding stability of land. Considers quarries have a functional need to be located in certain areas and this is more limited with a 100m setback. Further notes that the remaining land is less suitable due to high groundwater and being in the middle of paddocks.	Seeks to amend setback to 20m consistent with the setback from waterways. Amend EW(Q)-S2 as follows: … 1. New Farm quarries and new restricted use quarries must not be located within ~~100m~~ 20m of a residential activity on an adjoining site under different ownership from that of the land on which the farm quarry or restricted use quarry is located. 2. On sites adjoining a Residential or Settlement Zone boundary, the setback shall be at least 300m from the boundary for any new quarry, including restricted use quarry and farm quarry.
299.330	Twin Terraces Ltd & Cayuga Ltd	NOIC – North Otago Irrigation Company Limited	North Otago Irrigation Scheme Designation Unique Identifier NOIC-1 Designation P	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain the designation as notified.
299.331	Twin Terraces Ltd & Cayuga Ltd	Planning Maps	General	Oppose	Opposes the Waitaki Plains Flood Assessment. Considers the Otago Flood overlay which is based more on expertise and experience should be used for rules instead of the Waitaki Plains model. Considers that both models appear to overestimate areas that may flood compared to the GNS geomorphology report. [Refer to original submission for full reasons]	Seeks the removal of the Waitaki Plains Flood Assessment overlay mapping, or alternatively for the removal of its rules by deleting NH-R3.
299.332	Twin Terraces Ltd & Cayuga Ltd	Definitions	General	Support	Support all definitions except those submitted on	Retain all definitions as notified
299.333	Twin Terraces Ltd & Cayuga Ltd	Transport	TRAN-S20 Pedestrian walkways, cycleways and shared paths on public land other than roads	Support	Supports TRAN-R5 and associated permitted activity standardTRAN-S20 but submits that the Austroads Guide is replaced with aspecific standard to give oversight of any changes to the guide whichis not under WDC control or subject to submission.	Seeks amendments to TRAN-S20, replacing the Austroads Guide with aspecific standard.