

Proposed Waitaki District Plan

Section 42A Report: Strategic Direction

Report on submissions and further submissions

www.waitaki.govt.nz
t. 03 433 0300 e. service@waitaki.govt.nz
20 Thames Street, Private Bag 50058, Oamaru 9444



Authorisation and status			
Author	Katrina Clark		
Position	Senior Planner – District Plan		
Approved by	David Campbell – Heritage & Planning Manager		
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Abbreviations

Abbreviation	Full Text
Council	Waitaki District Council
CCRA	Climate Change Response Act 2002
CRPS	Canterbury Regional Policy Statement
ERP	Emissions Reduction Plan
NES	National Environmental Standard
NES-CF	National Environmental Standards for Commercial Forestry 2023
NES-CS	National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
NES-DMRU	National Environmental Standards for Detached Minor Residential Units 2025
NES-ETA	National Environmental Standards for Electricity Transmission and Electric Vehicle Charging Infrastructure Activities
NES-FW	National Environmental Standards for Freshwater 2020
NES-P	National Environmental Standards for Papakāinga 2026
NES-DW	National Environmental Standards for Sources of Drinking Water 2007
NES-TF	National Environmental Standards for Telecommunication Facilities 2016
NPS	National Policy Statement
NPS-EN	National Policy Statement for Electricity Networks 2008
NPS-FM	National Policy Statement for Freshwater Management 2020
NPS-HPL	National Policy Statement for Highly Productive Land 2022
NPS-I	National Policy Statement for Infrastructure 2025
NPS-IB	National Policy Statement for Indigenous Biodiversity 2023
NPS-NH	National Policy Statement for Natural Hazards 2025
NPS-UD	National Policy Statement on Urban Development 2020
NPS-REG	National Policy Statement for Renewable Electricity Generation 2011
NPStds	National Planning Standards
NZCPS	New Zealand Coastal Policy Statement 2010
ODP	Operative Waitaki District Plan
fORPS	Former Otago Regional Policy Statement 2019
PDP	Proposed Waitaki District Plan
ORPS	Operative Otago Regional Policy Statement 2021
RMA	Resource Management Act 1991
SD	Strategic Direction
WDC	Waitaki District Council

1 Submitters Addressed in Report

The tables below list the original and further submitters addressed in this report.

Table 1: Original Submitters Addressed in this Report

Sub	Submitter Name	on Behalf of	Abbreviation
148	Helen Stead		H Stead
163	Fire and Emergency New Zealand	Fire and Emergency New Zealand	FENZ 2
164	NPHS Te Waipounamu		NPHS
166	Horticulture New Zealand		HortNZ
168	Kāinga Ora		KO
188	Mackenzie District Council		MDC
190	Alliance Group Limited		Alliance
192	New Zealand Carbon Farming Group		NZ Carbon Farming
194	Director-General of Conservation		DOC
195	New Zealand Pork Industry Board		NZ Pork
197	PowerNet Limited		PowerNet
198	Aquaculture New Zealand		Aquaculture NZ
204	River-T Wines		River-T Wines
205	Waitaki Winegrowers Association		Waitaki Winegrowers
206	Sublime Wine		Sublime Wine
207	Little Domett Estate		Little Domett
208	Black Stilt Wines Ltd		Black Stilt
209	ACG Wines – Clos Ostler		ACG Wines
210	Dragon Bones Vineyard		Dragon Bones
211	Valli Vines LTD		Valli Vines
227	Janice Wheeler		J Wheeler
232	Hampden Community Energy Society		HCES
233	KiwiRail Holdings Limited		KiwiRail
235	Cormorants on Waterfront Limited		COWL
238	Fuel Companies		Fuel Companies
240	Environmental Defence Society Incorporated (EDS)		EDS
242	Ministry of Education Te Tāhuhu o Te Mātauranga		MOED
243	Whitestone Contracting Limited		WCL
244	Telecommunication Companies		Telcos

Sub	Submitter Name	on Behalf of	Abbreviation
246	Federated Farmers of New Zealand Incorporated		FFNZ
251	Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki		Kā Rūnaka
253	Royal Forest and Bird Protection Society of New Zealand Incorporated		Forest & Bird
256	Fish and Game (Otago and Central South Island Fish and Game Councils)		Fish & Game
257	Heritage New Zealand Pouhere Taonga (HNZPT)		HNZPT
259	Otago Regional Council		ORC
265	Geoff and Katrina Taylor		G & K Taylor
267	Kelvin and Debbie Weir		K & D Weir
269	Brenda & Ken McLeod		B & K McLeod
271	Canterbury Regional Council		CRC
282	Dogterom Thomson Ltd		DTL
283	Dogterom Hohepa Ltd		DHL
284	Dogterom Duntroon Ltd		DDL
285	Barry and Anne Matthews		B & A Matthews
288	Network Waitaki Limited		Network Waitaki
290	Philip and Becky Wilson		P & B Wilson
291	Peter and Janine Stackhouse		P & J Stackhouse
292	Robert and Sylvia Borst		R & S Borst
293	Brock and Gemma Hamilton		B & G Hamilton
294	Meridian Energy Limited		Meridian
295	OceanaGold (New Zealand) Limited		OceanaGold
296	Gavin Simpson		G Simpson 2
297	Parkside Holdings Ltd		Parkside
298	Alastair and Carrie Gibson		A & C Gibson
299	Twin Terraces Ltd & Cayuga Ltd		TT & Cayuga
300	Adrianus and Francisca Verbakel & others		A & F Verbakel
301	Carolyn Thelning		C Thelning
302	Peter and Sandra Mitchell		P & S Mitchell
303	Terry and Fiona Conlan		T & F Conlan
304	Kirsty and Nathan McLachlan		K & N McLachlan
309	Transpower New Zealand Limited		Transpower

Sub	Submitter Name	on Behalf of	Abbreviation
310	Graymont (NZ) Limited		Graymont
312	Springbank		Springbank
313	Geoff & Jan Keeling - Keeling Dairies Limited		Keeling Dairies

Table 2: Further Submitters Addressed in this Report

Submitter Name	Abbreviation
Federated Farmers of New Zealand Incorporated	FFNZ
Kainga Ora Homes and Communities	Kainga Ora
KiwiRail Holdings Limited	KiwiRail
Meridian Energy Limited	Meridian
OceanaGold (New Zealand) Limited	OceanaGold
Royal Forest & Bird Protection Society of New Zealand Inc	Forest & Bird
St Kevins College	SKC
Waitaki Property Guardians Incorporated	WPGI

2 Introduction

2.1 Experience and Qualifications

1. My full name is Katrina Dawn Clark. I am a Senior Planner – District Plan at Waitaki District Council and have held this position since 2020. I hold a Bachelor of Science (Hons) in Estate Management (University of Greenwich) and a Master of Arts in Town and Country Planning received from the University of the West of England in 2002. I have been employed by the Waitaki District Council since January 2018. Immediately prior to this, I was contracted by the Waitaki District Council as a Consultant Planner for a period of eight months.
2. I have over 25 years of experience in local government and private practice resource management and planning policy both in the United Kingdom and New Zealand, which includes working as a policy planner and a consents planner with over 10 years at a senior level. My experience includes the coordination of the district plan review process and technical drafting and s32 reporting for the draft and proposed versions of the Waitaki District Plan. I have also been responsible for the review of internal and external chapter authors for the Proposed District Plan (PDP) along with their s32 report evidence.
3. Although this is a Council hearing, I confirm that I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note and that I have complied with it when preparing this report. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person. Having reviewed the submitters and further submitters relevant to this topic I advise there are no real or perceived conflicts of interest that would impede me from providing independent advice to the Hearing Panel.

2.2 Purpose and Scope of this Report

4. The purpose of this report is to provide the Hearing Panel with a summary and analysis of the submissions received on this topic, and to make recommendations in response to those submissions, to assist the Hearing Panel in evaluating and deciding on the submissions.
5. This report is prepared under s42A of the RMA in relation to Strategic Directions in the PDP. It covers the following matters:
 - Strategic Direction objectives relating to the following matters:
 - General overview
 - Historical and cultural identity and values
 - Climate change
 - Urban form and development
6. This report does not consider definitions in relation to the Strategic Direction topic and does not consider Strategic Direction objectives related to community facilities and open space, the Ōamaru Harbour, mana whenua, infrastructure and energy efficiency or natural

hazards. Strategic Direction on these matters are addressed in each of the relevant topic reports.

7. This report considers the submissions and further submissions that were received in relation to Strategic Direction objectives on historical and cultural identity and values, climate change and urban form and development. It includes recommendations to either retain provisions without amendment, or to delete, add to, or amend provisions in response to submissions. All recommended amendments are shown by way of ~~strikeout~~ and underlining in **Appendix 1** to this Report, or, in relation to mapping, through recommended spatial amendments to the mapping. Footnoted references to the relevant submitter(s) identify the scope for each recommended change. Recommended responses to each submission are given in **Appendix 2**.
8. Where changes are recommended, an evaluation has been undertaken in accordance with Section 32AA of the RMA.
9. The conclusions reached and recommendations made in this report are not binding on the Hearing Panel. It should not be assumed that the Hearing Panel will reach the same conclusions having considered all the information in the submissions and the evidence to be brought before them by the submitters.

2.3 Submissions on Withdrawn PDP Provisions

10. On 15 January 2026, the Council withdrew aspects of the PDP that would no longer be progressed under the Plan Stop provisions in subpart 5B of the RMA. This included withdrawal of the following Strategic Direction objectives:
 - SD-CHI-O3 Waitaki's cultural heritage
 - SD-NE-O1 Natural character, landscape and features and ecosystems
 - SD-NE-O3 Dark Skies
 - SD-RA-O1 Productive rural environments
 - SD-RA-O2 Protecting highly productive land
 - SD-RA-O3 Rural character and reverse sensitivity
11. Submissions that were made on aspects of the PDP that have since been withdrawn (or that seek relief relating to topics that have since been withdrawn) are no longer relevant to proceedings. Such submissions related to Strategic Direction have been identified by staff, are listed in **Appendix 3**, and are not considered further in this report. The Hearing Panel may direct that these submission points be struck out in accordance with s41D of the RMA as no longer relevant to the proposal. If the Hearing Panel determines that any submission point listed in **Appendix 3** should be considered, those points can be assessed in the reporting officer's right of reply.
12. It is possible that some submission points **not** identified in **Appendix 3** may still be wholly or partly outside the scope of the PDP. Any residual scope issues will be dealt with in the appropriate section of this report.

3 Topic Overview

3.1 Summary of Relevant Provisions of the PDP

13. This report relates to provisions associated with the Strategic Direction objectives. This section of the report provides a brief summary of the provisions relevant to this topic.

3.1.1 Historical and cultural identity and values

14. Strategic Directions SD-CHI-O1 'Character and identity' and SD-CHI-O2 'Recognition, protection, and future opportunities for Waitaki's heritage' collectively address the need to recognise, protect, and sustain Waitaki's distinctive character, cultural identity, and historic heritage across the District. They acknowledge the outstanding contribution that heritage buildings, items, areas, and features make to the community, while also recognising that opportunities for the ongoing use and adaptive re-use of heritage assets should be provided to ensure they remain viable and relevant. Together, the objectives seek to balance preservation with practicality, embedding heritage recognition into district-wide planning and decision-making.

3.1.2 Climate change

15. Strategic Direction SD-RRNH-O2 'Adapting to climate change' addresses the need to recognise and respond to climate change through an integrated, multi-faceted management approach across the Waitaki District. It seeks to embed climate considerations into natural hazards planning, support community adaptation, promote efficient and low-emissions urban development patterns, and strengthen the resilience of both natural and built environments by supporting healthy, functioning ecosystems and natural processes.

3.1.3 Urban form and development

16. Strategic Directions relating to urban form and development are as follows:

- SD-UFD-O1 Integrated management
- SD-UFD-O2 Housing choice and intensification
- SD-UFD-O3 Location of activities
- SD-UFD-O4 The urban environment
- SD-UFD-O5 District-wide growth
- SD-UFD-O6 Urban Growth

17. These six objectives collectively establish a strategic framework for managing urban form, development, and growth across the Waitaki District in a coordinated, sustainable, and community-focused manner. They seek to ensure that urban environments are well-designed, liveable, and supported by appropriate infrastructure, while offering a diverse range of housing types and tenures to meet the District's varied social, cultural, and

economic needs. The location of activities is to be carefully managed to promote land use efficiency, protect amenity values, and avoid incompatible land uses. Growth across the District is to occur in a cohesive, compact, and structured way, with sufficient land supply for residential, commercial, industrial, and social needs, and future urban expansion directed to appropriately serviced and identified locations. Together, the objectives aim to create connected, accessible, and well-functioning urban environments where communities can live, work, and play.

3.2 Background to Relevant Provisions

18. The Strategic Direction objectives were developed by elected members in 2021 following extensive community consultation during the investigation of issues and discussion document stage of the district plan review process. The objectives were subsequently released in the Draft District Plan for community and stakeholder consultation in 2022 and further refined in response to the feedback received.

19. The objectives (considered in this report) were guided by the following higher order documents:

Historical and cultural identity and values:

- Objective 2.2 of the fORPS: Kāi Tahu values, interests and customary resources are recognised and provided for; and
- Objective 5.2 of the fORPS: Historic heritage resources are recognised and contribute to the region's character and sense of identity; and
- Objective 13.2.1 of the CRPS: Identification and protection of significant historic heritage: Identification and protection of significant historic heritage items, places and areas, and their particular values that contribute to Canterbury's distinctive character and sense of identity from inappropriate subdivision, use and development; and
- Objective 13.2.2 of the CRPS: Historic cultural and historic heritage landscapes: Recognition that cultural and heritage values are often expressed in a landscape setting and to make provision for the protection of such landscapes from inappropriate subdivision, use and development.

Climate change

- Objective 8 of the NPSUD which require New Zealand's urban environments to be resilient to the current and future effects of climate change; and
- Objective 4.2 of the fORPS: Otago's communities are prepared for and able to adapt to the effects of climate change; and
- IM-O4 of the ORPS Climate change: Otago's communities, including Kāi Tahu, understand what climate change means for their future, and climate change responses in the region, including adaptation and mitigation actions, are aligned with national level climate change responses and are recognised as integral to achieving the outcomes sought by the RPS; and

- HAZ-NHO2 of the ORPS: Otago's people, property and communities are prepared for and able to adapt to the effects of natural hazards, including climate change; and
- UFD-O5 of the ORPS: Urban development and climate change – the impacts of climate change are responded to in the development and change of Otago's urban areas; and
- Objective 11.2.3 of the CRPS: The effects of climate change, and its influence on sea levels and the frequency and severity of natural hazards, are recognised and provided for.

Urban form and development

- Objective 2 of the NPS-UD for integrated infrastructure planning and funding decisions; and
- Objective 6 of the NPS-UD which seeks to ensure that decisions regarding development and the urban environment are integrated with infrastructure planning and funding decisions; and
- Policy 1 of the NPS-UD which requires planning decisions to contribute to well-functioning urban environments; and
- Policy 2 of the NPS-UD which requires that there is at least sufficient development capacity to meet expected demand; and
- Policy 5 of the NPS-UD which requires higher density housing to be enabled in areas that are highly accessible or have a high relative demand; and
- Objective 1.1 of the fORPS: Otago's resources are used sustainably to promote economic, social, and cultural wellbeing for its people and communities; and
- Objective 1.2 of the fORPS: Recognise and provide for the integrated management of natural and physical resources to support the wellbeing of people and communities in Otago; and
- Objective 4.5 of the fORPS: Urban growth and development is well designed, occurs in a strategic and coordinated way, and integrates effectively with adjoining urban and rural environments; and
- IM-O1 of the ORPS– Long term vision; and
- UFD-O1 of the ORPS – Form and function of urban areas; and
- UFD-O2 of the ORPS – Development of urban areas; and
- UFD-O3 of the ORPS – Strategic planning; and
- Objective 5.2.1 of the CRPS: Location, design and function of development; and
- Objective 5.2.2 of the CRPS: Integration of land-use and regionally significant infrastructure; and

20. Since notification of the PDP, the Otago Regional Policy Statement 2021 has become fully operative and now replaces the Otago Regional Policy Statement 2019. References in earlier plan drafting and evaluation documents to the proposed, decisions, or appeals versions of the ORPS 2021 should be read as references to the now operative ORPS 2021.

4 Overview of Submissions

21. The full list of submission points addressed in this report is set out in **Appendix 2**. Overall, 105 original submission points and 18 further submission points are addressed.

22. The following table provides a brief summary of the key issues raised in submissions, which are discussed in more detail in the ‘Evaluation of Submissions’ section of this report.

Table 3: Summary of Key Issues Raised in Submissions

Issue Name	Summary of Issue	Position of Submitters
General	- Broad support for the SD objectives relating to urban form, housing, location of activities, and growth, with general alignment acknowledged with the NPS-UD. - Wording considered too weak in several objectives, with submitters seeking stronger and clearer language to better give effect to the intended outcomes. - Infrastructure is a recurring theme, with submitters emphasising the need for explicit recognition of infrastructure requirements — including social infrastructure — to support housing density, urban growth, and emergency response. - Functional and operational needs of certain activities are not adequately recognised, particularly in relation to location of activities, mineral extraction, and adaptive re-use in heritage and mixed-use settings. - Growth should be purposeful and well-managed, with calls for cohesive, landscape-scale	40 submissions made on the general intent of the SD objectives; 23 submitters in full support of the overall SD objectives; 4 submitters in support of the SD objectives subject to minor amendments 13 submitters requesting overall amendments to the SD objectives; 2 submitters opposed to the SD objectives in general.

Issue Name	Summary of Issue	Position of Submitters
	development that prioritises community wellbeing, housing affordability, and sufficient land supply rather than growth as an end in itself.	
Historical and cultural identity and values	• Broad support as complementary to other strategic objectives and consistent with RMA section 6(f). • Support for recognising and protecting historic and cultural heritage, including the aesthetic, structural, and heritage values of historic buildings in Ōamaru and the wider Waitaki district. • Support for adaptive re-use and ongoing use of heritage buildings as an appropriate heritage management approach. • Unclear articulation and scope with repetition and inconsistency between the objectives and concern they are inconsistent with Part 2 of the RMA and the NPS-REG. • Risk of blanket exclusion of renewable electricity generation activities without proper consideration of effects or national significance. • Overly absolute protection requirements, with submitters preferring an approach focused on protecting the values of features rather than requiring full protection of all features. • Site-specific concerns, including the need to maintain the Victorian streetscape in Ōamaru's heritage quarter and recognition that full protection may not always be	• 17 submissions made on the objectives; • 6 submitters in full support of the objectives; • 3 submitters in support of the objectives subject to minor wording amendments; • 5 submitters requesting amendments to the objectives; • 3 submitters opposed to the objectives.

Issue Name	Summary of Issue	Position of Submitters
Climate change	practicable where existing lawful activities operate. • Broad support with general agreement that climate change adaptation should be integrated into natural hazards management and ecosystem resilience. • Emissions reduction should be more explicitly recognised within the objective, with stronger alignment to national climate change legislation and policy. • Strengthening of provisions is needed, with the objective considered to lack sufficient recognition of mitigation measures alongside adaptation. • Amendment to specific wording sought, including changes to community adaptation language and explicit recognition of indigenous species resilience to climate change effects. • Ki uta ki tai approach and partnership with Kāi Tahu should be incorporated, reflecting an integrated mountains-to-sea management perspective.	• 11 submissions made on the objective; • 1 submitter in full support of the objective; • 6 submitters in support of the objective subject to minor wording amendments; • 3 submitters requesting amendments to the objective; • 1 submitter opposed to the objective.
Urban form and development	• Broad support for the objectives with general agreement that good quality design, housing diversity, and appropriate location of activities are important strategic directions. • Strengthening of wording sought across several objectives, including clearer alignment with the NPS-UD, stronger recognition of infrastructure requirements, and explicit provision for vibrancy, adaptive re-use, and mixed-use development in	• 33 submissions made on the objectives; • 21 submitters in full support of the objectives; • 9 submitters in support of the objectives subject to minor wording amendments; • 1 submitter requesting amendments to the objectives; • 2 submitters opposed to the objectives.

Issue Name	Summary of Issue	Position of Submitters
	town centres and heritage precinct. • Housing diversity and density supported, with emphasis on ensuring a variety of housing types and tenures are accessible to vulnerable groups, and that higher density is appropriately located near services, transport, and infrastructure. • Location of activities broadly supported, particularly reverse sensitivity protections and compatible land use clustering, though concern raised that functional and operational needs of certain activities such as mineral extraction are not adequately recognised. • District-wide and urban growth objectives supported in principle, but with calls to ensure growth is cohesive and landscape-scale rather than growth for its own sake, and that sufficient land and infrastructure, including social infrastructure such as schools, is provided to meet the community's needs.	

5 Relevant Statutory Provisions

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

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

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

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

6 Statutory Instruments

25. The s32 report for the Strategic Direction objectives set out the statutory requirements and relevant planning context for this topic in more detail. The section below summarises the most relevant provisions from the most relevant planning instruments and highlights any pertinent changes to national direction that have occurred since the PDP was notified.

6.1 National Policy Statement – Urban Development 2020

26. The NPS-UD 2020 is a national direction instrument that councils must give effect to in their resource management planning decisions. It aims to ensure New Zealand's towns and cities are well-functioning urban environments that meet the changing needs of diverse communities. Its relevance to Waitaki's urban form and development strategic direction objectives is as follows.

Objective 2 Housing Affordability

Objective 2 requires that planning decisions improve housing affordability by supporting competitive land and development markets. This is directly relevant to SD-UFD-O2 and SD-UFD-O5, which seek to provide a variety of housing types, sizes, and tenures and ensure sufficient land supply. Waitaki's strategic direction objectives must be consistent with this by avoiding overly restrictive planning provisions that could constrain housing supply or inflate land and development costs.

Objective 6 Integrated and Strategic Decision-Making

Objective 6 requires that local authority decisions on urban development are integrated with infrastructure planning and funding decisions, strategic over the medium and long term, and responsive, particularly in relation to proposals that would supply significant development capacity. This is directly relevant to SD-UFD-O1, O5, and O6, which emphasise integrated infrastructure, cohesive growth, and future urban land supply and ensure that urban growth decisions are not made in isolation from infrastructure planning.

Policy 1 requires planning decisions to contribute to well-functioning urban environments by enabling a variety of housing types and prices, a range of business sites, and good accessibility between housing, jobs, and community services. This directly supports SD-UFD-O2, O3, and O4 in seeking housing diversity, appropriate location of activities, and connected, liveable urban environments.

Policy 2 requires local authorities to maintain sufficient development capacity to meet expected housing and business land demand across the short, medium, and long term. This

reinforces SD-UFD-O5 and O6 by requiring Waitaki to ensure an adequate and responsive supply of zoned land to meet the community's growth needs.

Policy 5 requires district plans to enable heights and density of urban form commensurate with the level of transport accessibility and relative demand for housing and business use in a given location. This is relevant to SD-UFD-O2, which provides for higher density housing near town centres and where infrastructure and transport access exists, and must be read in the context of Waitaki's tier 3 status under the NPS-UD.

27. It is noted that whilst the NPS-UD 2020 remains in force, its future is subject to the current government's broader resource management reform programme. For now, it remains the operative national direction instrument that WDC must give effect to in its district plan.

6.2 Former Otago Regional Policy Statement 2019

28. The former Otago Regional Policy Statement 2019 (fORPS) was the operative regional policy statement during the preparation and notification of the PDP. As approximately half of the Waitaki District lies within the Otago Region, the PDP was required to give effect to the fORPS at that time. While the fORPS has since been replaced by the now operative Otago Regional Policy Statement 2021, it remains relevant in understanding the policy framework that informed the drafting and notification of the PDP.

29. The following objectives from the fOPRS were relevant to the Strategic Direction topic addressed in this report:

- Objective 1.1: Otago's resources are used sustainably to promote economic, social, and cultural wellbeing for its people and communities.
- Objective 1.2: Recognise and provide for the integrated management of natural and physical resources to support the wellbeing of people and communities in Otago.
- Objective 2.2: Kāi Tahu values, interests and customary resources are recognised and provided for.
- Objective 4.2: Otago's communities are prepared for and able to adapt to the effects of climate change.
- Objective 4.5: Urban growth and development is well designed, occurs in a strategic and coordinated way, and integrates effectively with adjoining urban and rural environments.
- Objective 5.2: Historic heritage resources are recognised and contribute to the region's character and sense of identity.

6.3 Otago Regional Policy Statement 2021

30. Since notification of the PDP, the Otago Regional Policy Statement 2021 (ORPS) has become fully operative and now replaces the (former) Otago Regional Policy Statement 2019. References in earlier plan drafting and evaluation documents to the proposed, decisions, or appeals versions of the ORPS 2021 should be read as references to the now operative ORPS 2021. The district plan must now give effect to the ORPS 2021

31. It is noted that the PDP was prepared to have regard to the pORPS (Decisions version). Now that this plan is operative, the changes are noted to the relevant objectives for the Strategic Direction topic:

IM Integrated management objectives

IM–O1 and IM–O4 are retained in the ORPS, but have been subject to amendments. The amendments generally refine the wording and improve clarity, particularly in relation to integrated management outcomes and climate change response. While the provisions have been updated, the underlying policy intent and direction of these objectives remains largely unchanged.

- IM–O1 Long term vision, addresses the integrated and coordinated management of natural and physical resources to achieve consistent environmental outcomes and support the wellbeing of communities.
- IM–O4 Climate change, focuses on ensuring Otago’s communities understand climate change and respond in ways that align with national direction, support emissions reduction goals, and contribute to achieving the outcomes of the RPS.

HAZ Natural hazards objectives (climate change)

HAZ–NH–O2 has been retained in ORPS, with amendments to refine the wording and clarify intent, without altering the overall structure or purpose of the objective.

- HAZ–NH–O2 addresses natural hazard adaptation by requiring that Otago’s people, communities, property, and the environment are prepared for and able to adapt to the effects of natural hazards, including those exacerbated by climate change.

UFD Urban form and development objectives

The ORPS restructures the Urban Form and Development objectives by removing or consolidating a number of objectives from the Decisions version (including UFD–O2 to UFD–O5). The matters addressed by those provisions have largely been incorporated into a simplified objective set. While this limits direct objective-by-objective comparison, the overall policy direction remains broadly consistent, with the changes representing refinement and consolidation rather than a fundamental shift in approach.

UFD–O1 has been retained in the ORPS but has been amended and broadened in scope. In contrast to the Decisions version, where multiple objectives (UFD–O2 to UFD–O5) articulated discrete aspects of urban form and development, the ORPS consolidates these matters into a refined objective framework. As a result, UFD–O1 now captures a wider range of urban outcomes, including elements previously addressed separately, and operates as the central objective within the UFD chapter.

- UFD–O1 requires that the development of urban areas occurs in a strategic and coordinated manner to achieve well-functioning urban environments that meet the diverse needs of communities, are well-connected and efficiently serviced, integrate with surrounding areas and infrastructure, support climate change response, and reflect the values and aspirations of iwi and hapū.

6.4 Canterbury Regional Policy Statement

32. The Canterbury Regional Policy Statement (CRPS) is operative, having become fully operative on 15 January 2013, and continues to provide the regional policy framework for Canterbury, with approximately half of the Waitaki district in Canterbury. While Environment Canterbury has initiated a review to replace the CRPS, work on a proposed new RPS has been paused in response to recent legislative changes and national direction, meaning no replacement instrument is currently progressing and the operative CRPS remains the relevant statutory document.
33. The following objectives are relevant to the Strategic Direction topic addressed in this report:
- Objective 5.2.1: Location, design and function of development. This objective requires development to be consolidated and well-designed around existing urban areas, supporting sustainable growth while enabling community wellbeing, protecting the natural environment, ensuring efficient infrastructure use, and avoiding adverse or incompatible land use effects.
 - Objective 5.2.2: Integration of land-use and regionally significant infrastructure. This objective requires coordinated land use and infrastructure planning to support community wellbeing, while ensuring development is sequenced and located to avoid or mitigate adverse effects on regionally significant infrastructure and achieve efficient, sustainable, and liveable outcomes.
 - Objective 11.2.3: Climate change and natural hazards. This policy recognises the effects of climate change, including increased natural hazard risks and sea level rise, and requires these effects to be taken into account in managing subdivision, use, and development.
 - Objective 13.2.1: Identification and protection of significant historic heritage. This objective requires the identification and protection of significant historic heritage, including items, places, and areas, to retain their values and contribution to Canterbury's character and identity by avoiding inappropriate subdivision, use, and development.
 - Objective 13.2.2: Historic cultural and historic heritage landscapes. This policy recognises that cultural and heritage values are embedded within landscape settings and seeks to protect those landscapes from inappropriate subdivision, use, and development.

7 Evaluation of Submissions

7.1 Approach to Evaluation

34. The evaluation in this report is undertaken in the context of assessing submissions and further submissions and is structured at both a thematic and provision-specific level.

Submissions are first considered in groups based on the key themes of historic heritage, climate change, and urban form and development, to provide a high-level understanding of the issues raised and the strategic implications of the requested changes. This is followed by a detailed provision-by-provision assessment, evaluating the appropriateness of the relief sought in terms of the wording, intent, and effectiveness of the individual objectives. This approach ensures a coherent and efficient evaluation of submissions, while enabling both strategic and detailed consideration of the matters raised.

35. The assessment of submissions generally follows the following format:

- A brief summary of the relevant submission points.
- An analysis of those submission points.
- Recommendations, including any amendments to plan provisions and the related assessment under s32AA.

36. Clause 10(2)(b), Schedule 1 of the RMA provides for consequential changes arising from the submissions to be made where necessary, as well as any other matters relevant to the PDP arising from submissions. Consequential changes recommended under clause 10(2)(b) are footnoted as such.

37. Clause 16(2), Schedule 1 of the RMA allows a local authority to make an amendment to a proposed plan without using a Schedule 1 process, where such an alteration is of minor effect, or may correct any minor errors. Any changes recommended under clause 16(2) are footnoted as such.

38. Further submissions have been considered in the preparation of this report, but in general, they are not specifically mentioned because they are limited to the matters raised in original submissions and therefore the subject matter is canvassed in the analysis of the original submission. Further submissions may however be mentioned where they raise a valid matter not addressed in an original submission. Further submissions are not listed within Appendix 2. Instead, recommendations on the primary submissions indicate whether a further submission is accepted or rejected as follows:

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

7.2 General Submission Points

39. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation

to each point is provided in full in **Appendix 2**. Overall, 40 original submission points and 11 further submission points are addressed here.

Submitter Name	Submission Point Number(s)
Mackenzie District Council	188.9
Director General of Conservation	194.21
Aquaculture New Zealand	198.2
River-T Wines	204.2
Waitaki Winegrowers Association	205.2
Sublime Wine	206.2
Little Dommett Estate	207.2
Black Stilt Wines Limited	208.2
ACG Wines – Clos Ostler	209.2
Dragon Bones Vineyard	210.2
Valli Vines LTD	211.2
Federated Farmers of New Zealand Incorporated	246.42, 246.47
Royal Forest and Bird Protection Society of New Zealand Incorporated	253.6, 253.7
Fish and Game (Otago and Central South Island Fish and Game Councils)	256.22
Geoff and Katrina Taylor	265.1
Kelvin and Debbie Weir	267.1
Brenda & Ken McLeod	269.1
Canterbury Regional Council	271.66
Dogterom Thomson Ltd	282.1
Dogterom Hohepa Ltd	283.1
Dogterom Duntroon Ltd	284.1
Barry and Anne Matthews	285.1
Philip and Becky Wilson	290.1
Peter and Janine Stackhouse	291.1
Robert and Sylvia Borst	292.1
Brock and Gemma Hamilton	293.1
Meridian Energy Limited	294.12
Gavin Simpson	296.1
Parkside Holdings Ltd	297.1
Alastair and Carrie Gibson	298.1
Twin Terraces Ltd & Cayuga Ltd	299.1

Submitter Name	Submission Point Number(s)
Adrianus and Francisca Verbakel & others	300.1
Carolyn Thelning	301.1
Peter and Sandra Mitchell	302.1
Terry and Fiona Conlan	303.1
Kirsty and Nathan McLachlan	304.1
Springbank	312.1
Geoff & Jan Keeling - Keeling Dairies Limited	313.1
Further Submitter Name	Further Submission Point Number(s)
Kainga Ora	253.7
OceanaGold (New Zealand) Limited	246.42 246.47, 253.6, 294.12
Royal Forest & Bird Protection Society of New Zealand Inc	188.9, 198.2, 205.2, 251.37, 295.77
Federated Farmers of New Zealand Incorporated	256.22

7.2.1 Submissions

40. Twenty-three submitters (including individuals, farming entities, and some organisations) generally support the overall Strategic Direction chapter, particularly its focus on rural identity, historical and cultural values, and primary production.
41. FFNZ [246.42] support the chapter but also seek the inclusion of district-specific resource management issues to be addressed to better underpin policy development. FFNZ [246.47] also seek for a targeted objective to address the tensions between primary production and environmental protection.
42. Both MDC [188.9] and CRC [271.66] support the chapter but consider there should be an objective added to address agency alignment and collaboration on the Mackenzie Basin/Te Manahuna.
43. Amendments are sought by Waitaki winegrowers to recognise the role of viticulture within the district and to safeguard from incompatible development. Aquaculture NZ [198.2] consider that aquaculture activities should be supported in the SD objectives.
44. Forest & Bird [253.6 and 253.7] seek to add new objectives for both rural and urban areas to maintain, restore and enhance indigenous biodiversity and ecological corridors, and Fish & Game [256.22] seek to embed Te Mana o te Wai as a core concept in the SD objectives.
45. Amendments to the introduction of the SD chapter are sought by Kā Rūnaka [251.37] to explicitly include protection of the life-supporting capacity of the natural environment alongside managing growth, land use, and development. OceanaGold [295.77] and Transpower [309.33] consider more clarity and conciseness is needed to clearly articulate the role of the SD objectives.

46. Meridian [294.12] oppose the chapter and seek that the objectives are rewritten to remove duplication and provide more consistency with Part 2 of the RMA and relevant national policy statements.

7.2.2 Analysis

47. The withdrawal of the General Rural Zone chapter and mapping, together with the Natural Environment Values chapters (including Ecosystems and Indigenous Biodiversity, and Natural Features and Landscapes) and their associated overlays, is a significant consideration in assessing a number of submission points. In the absence of these chapters, there is no longer a relevant policy framework or implementation pathway within the PDP to address the specific matters raised by submitters such as the Waitaki winegrowers¹, Aquaculture NZ², MDC³, CRC, Forest & Bird⁴⁵, and FFNZ⁶. While the Strategic Direction objectives provide high-level, district-wide direction, they are not intended to operate in isolation or to provide detailed management responses. As such, introducing amendments to the objectives in response to these submissions would result in isolated or unsupported provisions, creating inconsistency within the plan framework and undermining the integrated approach to plan implementation for the now exempt version.
48. The submission by Meridian seeks a comprehensive rewrite of the SD objectives on the basis that they are overlapping, potentially inconsistent with higher-level documents, and more appropriately located within topic-specific chapters⁷. The SD chapter is required to provide overarching, integrated objectives that guide the plan as a whole, and a degree of overlap reflects the competing nature of resource management issues rather than a deficiency. Retaining these objectives centrally ensures a cohesive framework, while relocating or repeating them across topic chapters would create duplication and risk inconsistency. The objectives have been developed to give effect to Part 2 of the Act and relevant national policy statements at a strategic level.
49. The submissions by OceanaGold⁸ and Transpower seek to amend the explanation of how the Strategic Direction objectives apply to resource consent applications, notices of requirement, and plan changes. The intent of the proposed amendment to clarify that the Strategic Direction objectives may be relevant to a range of plan processes, including resource consents and notices of requirement, is supported. However, I consider that the notified wording appropriately emphasises the importance of the Strategic Direction objectives, particularly for significant or complex resource consent applications and future plan changes and provides helpful direction on when a more detailed assessment is expected. While the submitters' wording improves brevity, it introduces less certainty by stating that the objectives 'may' be relevant, which could dilute their intended role in guiding decision-making. The Strategic Direction objectives are intended to provide

¹ This submission point is opposed by Forest & Bird in their further submission [FS108]

² This submission point is opposed by Forest & Bird in their further submission [FS107]

³ This submission point is supported by Forest & Bird in their further submission [FS106]

⁴ This submission point is opposed by Kainga Ora in their further submission [FS176]

⁵ This submission point is opposed by OceanaGold in their further submission [FS467]

⁶ This submission point is supported by OceanaGold in their further submission [FS466]

⁷ This submission point is supported by OceanaGold in their further submission [FS468]

⁸ This submission point is opposed by Forest & Bird in their further submission [FS110]

overarching direction that is applicable across the Plan and should be given appropriate weight, particularly where higher-order considerations are engaged. On balance, a refined version that improves clarity and brevity while retaining the directive intent of the notified wording is considered most appropriate.

50. I consider the submission by FFNZ to amend the SD chapter introduction to recognise significant resource management issues in the Waitaki district to be beneficial and will provide wider context for the ensuing objectives⁹.
51. Kā Rūnaka seeks to amend the first sentence of the introduction to include reference to ‘protecting the life-supporting capacity of the natural environment’¹⁰. The intent of this submission is supported, and it is acknowledged that this concept is a core element of sustainable management under the Act. However, the concept of protecting the life-supporting capacity of the natural environment is already reflected through Part 2 of the RMA and is embedded within the Strategic Direction objectives and other provisions of the Plan. While the additional wording could be included without fundamentally altering the intent of the introduction, I recommend that the introduction should remain district-focused and describing the role of the chapter, with more detailed expression of environmental outcomes addressed through the objectives and policies of the Plan. While the submission’s intent is supported, I do not recommend any amendments as the notified wording is considered appropriate and effective.
52. I also consider the submission by Fish & Game¹¹ to insert reference to Te Mana o te Wai into strategic direction provisions for urban development to have merit as this recognises the fundamental connection between the location of growth and the capacity and health of freshwater systems, while remaining consistent with the respective functions of regional and territorial authorities. The recommended text for this addition is provided in the Urban form and development section of this report for objective SD-UFD-O3. Fish & Game have also requested that a dedicated strategic objective is added to address Te Mana o te Wai. Whilst recognising this as an important higher order concept under the NPS-FM, its’ primary implementation rests within regional planning instruments rather than district plans. I consider the introduction of a standalone strategic objective would risk duplicating the role of regional plans and is therefore not recommended.

7.2.3 Recommendations

53. I recommend the following changes to the proposal.
54. Amend the Strategic Direction chapter introduction to provide further clarity and district-wide context as follows:

Introduction

The Strategic Direction chapter sets the overarching direction for the District Plan to sustainably manage growth, land use and development in the Waitaki district. The strategic direction objectives help to implement relevant WDC plans, strategies, and policies as well

⁹ This submission point is supported by OceanaGold in their further submission [FS466]

¹⁰ This submission point is supported by Forest & Bird in their further submission [FS111]

¹¹ This submission point is opposed by FFNZ in their further submission [FS507]

as regulatory planning documents and legislation that the District Plan must give effect to. The strategic direction objectives reflect the intended outcomes to be achieved through the implementation of the District Plan.

For the purposes of preparing, changing, interpreting, and implementing this District Plan, the objectives and policies in all other chapters of the District Plan are to be expressed and achieved in a manner consistent with the objectives of this Chapter.

~~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.~~ The strategic direction objectives provide overarching direction for the Plan and are particularly relevant to future plan changes and to the assessment of discretionary or non-complying resource consent applications and notices of requirement. Where relevant, they are to be considered alongside the objectives and policies of topic chapters.

The Waitaki district spans a diverse range of coastal, rural, and high-country landscapes, encompassing valued landscapes, historic and cultural heritage, productive rural land, urban settlements, and rural communities. Key challenges facing the district include growth, rural character, natural hazards, climate change, the provision of open space and recreation, nationally significant infrastructure, renewable energy, alongside recognition of mana whenua relationships. The Strategic Direction objectives provide an integrated framework to guide development, support resilience, and protect the district's character and values.

7.2.4 Evaluation

55. The proposed amendments to the Strategic Direction chapter introduction are considered to be more appropriate in achieving the purpose of the RMA than the notified wording.
56. The amendments improve clarity regarding the role and application of the Strategic Direction objectives by explicitly recognising their relevance to notices of requirement, alongside plan changes and resource consent processes. This provides greater certainty for plan users and decision-makers as to when and how the objectives are to be applied, supporting more consistent and integrated decision-making across the District Plan.
57. The inclusion of a concise, district-specific overview of the key resource management challenges facing Waitaki enhances the effectiveness of the provisions by providing contextual understanding of the issues the objectives are intended to address. This assists in linking the Strategic Direction objectives to the district's particular characteristics and pressures, while maintaining a clear focus on outcomes.
58. Overall, the proposed changes are proportionate and appropriate and are more effective and efficient in achieving the purpose of the RMA than the notified provisions.

7.3 Historical and cultural identity and values

59. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, 16 original submission points and 3 further submission points are addressed here.

Submitter Name	Submission Point Number(s)
Janice Wheeler	227.2
Hampden Community Energy Society	232.2, 232.3
Cormorants on Waterfront Limited	235.1
Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	251.38, 251.39
Meridian Energy Limited	294.13, 294.14
OceanaGold (New Zealand) Limited	295.78, 295.79
Transpower New Zealand Limited	309.34
Helen Stead	148.3
Cormorants on Waterfront Limited	235.2
Heritage New Zealand Pouhere Taonga (HNZPT)	257.14
Transpower New Zealand Limited	309.35
Graymont (NZ) Limited	310.23
Further Submitter Name	Further Submission Point Number(s)
OceanaGold (New Zealand) Limited	294.13, 294.14, 309.34

7.3.1 Submissions

60. Seven submitters supported SD-CHI-O1 and SD-CHI-O2 as notified, recognising the importance of historic and cultural heritage to the District's identity and wellbeing, and the role of these objectives in giving effect to section 6(f) of the RMA. This included support from community groups, heritage interests, and Kā Rūnaka, who generally considered the objectives appropriate at a strategic level.
61. J Wheeler [227.2] seeks to expressly reference 'historic farming' within SD-CHI-O1 and both OceanaGold [295.78] and Transpower [309.34] seek to reframe SD-CHI-O1 and SD-CHI-O2 to focus on protecting 'values' rather than features.
62. Meridian [294.13] have concerns that SD-CHI-O1 and SC-CHI-O2 are inconsistent with Part 2 of the RMA and the NPS -REG and could unduly constrain renewable electricity generation activities without proper consideration of their effects or national significance.
63. Graymont [310.23] seek to qualify the protection of heritage under SD-CHI-O2 by the inclusion of the phrase 'to the greatest extent practicable'.

64. HCES [232.3, 232.26] provide support for SD-CHI-O2 with an amendment to also provide for the refurbishment of historic heritage alongside adaptive re-use.

7.3.2 Analysis

65. Overall, while there is strong support for the strategic recognition and protection of heritage and identity, submissions primarily seek to either broaden flexibility or refine wording, rather than fundamentally alter the role of these objectives within the Strategic Direction framework.
66. A consistent theme across opposing and amendment submissions was concern that the objectives were overly directive or absolute, particularly in requiring protection and lacked sufficient flexibility to accommodate ongoing use, development, and infrastructure activities and should instead provide for a more balanced, effects-based approach, including recognition of operational needs and national significance.
67. J Wheeler’s submission to include reference to ‘historic farming’ in SD-CHI-O1 is not recommended as the term ‘historic heritage’ is intentionally broad and encompasses a wide range of heritage values, including those associated with historic land uses such as farming. Introducing a specific reference to a single activity risks narrowing the interpretation and application of the term, potentially limiting recognition of other land uses, features, and activities that contribute to the District’s heritage values. Retaining the more encompassing term ‘historic heritage’ ensures the objective continues to provide for a comprehensive and flexible approach to recognising and protecting the full range of heritage values across the District.
68. Kā Rūnaka supports the intent of the objective, which is noted. However, the relief sought does not identify any deficiency in the objectives themselves and instead relates to its implementation through other plan provisions. These matters are more appropriately addressed in the relevant topic chapters. Accordingly, the submission is accepted in part to the extent it supports the objective, with no amendment recommended to the Strategic Direction chapter.
69. The concerns by Meridian regarding potential inconsistency with Part 2 of the RMA and the NPS-REG are only partially accepted¹². While it is important that the District Plan does not unduly constrain renewable electricity generation activities of national significance, the provisions in SD-CHI-O1 and O2 (noting that O3 has been withdrawn from the PDP) operate at a high-level strategic direction and do not of themselves impose regulatory controls or create a ‘blanket exclusion’ of any activity. The provisions must also be read alongside the wider District Plan framework, including provisions that give effect to the NPS-REG and enable consideration of the benefits and national significance of renewable electricity generation activities. Concerns regarding repetition and clarity are noted; however, the objectives each address distinct aspects of character, heritage, and identity, and collectively provide a coherent strategic framework. The proposed amendment to include wording such as ‘from inappropriate subdivision, use and development’ introduces unnecessary specificity at the strategic level and risks narrowing the intended application

¹² These submission points are supported by OceanaGold in their further submission {FS468}

of the objective. Overall, I do not consider that the current wording creates the risk identified by the submitter, and no amendment is recommended on this basis.

70. The request by OceanaGold and Transpower¹³ to include ‘values’ in SD-CHI-O1 aligns with s6(f) of the RMA, as the Act recognises the values underpinning historic heritage. However, I do not consider it necessary to add to the objectives, as ‘historic and cultural heritage’ and ‘character and identity’ already encompass these values. Adding the term risks redundancy and added complexity at a strategic level without materially improving the objective’s effectiveness. Retaining the current wording is sufficient and consistent with the Act.
71. HCES seeks to include ‘refurbishment’ in SD-CHI-O2. While enabling ongoing use of heritage buildings aligns with the RMA, the relevant provisions in the heritage chapter have been withdrawn, leaving no supporting framework to guide such activities. Including a broad term like ‘refurbishment’ risks uncertainty, inappropriate outcomes, and inconsistent decision-making. In this context, I consider it more appropriate to retain general wording (e.g. protection and adaptive re-use), as adding as specific terms such as ‘refurbishment’ would create an enabling signal without sufficient safeguards. Although refurbishment can support the ongoing use and viability of heritage buildings, its inclusion is not appropriate in the current plan context. In the absence of a comprehensive heritage management framework, retaining more general wording (e.g. protection and adaptive re-use) provides a more robust and defensible approach that avoids unintended consequences.

7.3.3 Recommendations

72. I recommend no changes to SD-CHI-O1 or SD-CHI-O2.

7.4 Climate change

73. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, 11 original submission points and two further submission points are addressed here.

Submitter Name	Submission Point Number(s)
Fire and Emergency New Zealand	163.10
Horticulture New Zealand	166.19
New Zealand Carbon Farming Group	192.11
New Zealand Pork Industry Board	195.10
Janice Wheeler	227.5
Hampden Community Energy Society	232.12
Environmental Defence Society Incorporated (EDS)	240.17

¹³ This submission point is supported by OceanaGold in their further submission {FS469}

Submitter Name	Submission Point Number(s)
Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	251.46
Royal Forest and Bird Protection Society of New Zealand Incorporated	253.3
Fish and Game (Otago and Central South Island Fish and Game Councils)	256.21
Otago Regional Council	259.17
Further Submitter Name	Further Submission Point Number(s)
Meridian Energy Limited	253.3
Waitaki Property Guardians Incorporated	240.17

7.4.1 Submissions

74. FENZ [163.10] supports SD-RRNH-O2 as notified and seeks no changes.
75. HortNZ [166.19] and NZ Pork [195.10] both support the intent of enabling adaptation but seek to explicitly include ‘activities’ alongside the community in clause 2.
76. NZ Carbon Farming [192.11] supports SD-RRNH-O2 in part and seeks to strengthen the objective by explicitly incorporating emissions reduction and alignment with the Emissions Reduction Plan. HCES [232.12] also seeks stronger, more directive wording (e.g. ‘actively facilitating’) and additional emphasis on ecosystem resilience and hazard sensitivity. EDS [240.17] also considers the objective should be strengthened to place climate change more centrally within natural hazards management.
77. J Wheeler [227.5] opposes the wording ‘enabling’ and seeks to replace it with ‘encourage’ favouring a less directive approach to community adaptation actions.
78. Kā Rūnaka [251.46] seek broader amendments to incorporate a ki uta ki tai approach, mātauraka Kāi Tahu, and life-supporting capacity, as well as refinements to structure and wording and Forest & Bird [253.3] seeks to refine clause 4 to better provide for indigenous biodiversity resilience and movement.
79. Fish and Game [256.21] raises the need for emission reduction direction at a strategic level but does not seek specific relief and ORC [259.17] considers the objective lacks recognition of mitigation measures, seeking an additional clause for maintaining hard protection structures.
80. Overall, most submitters support the intent of SD-RRNH-O2 but seek amendments to strengthen and refine the wording. Only one submitter sought for a softening in the approach.

7.4.2 Analysis

81. Whilst the submissions by HortNZ and NZ Pork to provide for community and activities to adapt to climate change is generally consistent with the intent of national direction, which recognises the need for climate change adaptation across communities, land use and

infrastructure, I do not consider this addition necessary in this context. The term 'community' is sufficiently broad to encompass people and the activities they undertake. Including 'activities' risks expanding the scope of the objective beyond its strategic intent and could create ambiguity as to the extent to which particular activities should be enabled in response to climate change, particularly where this may conflict with other elements of the objective such as natural hazard risk management and the transition to a low emissions environment.

82. While the proposed amendments by NZ Carbon Farming are generally consistent with national direction, which supports both climate change adaptation and the reduction of greenhouse gas emissions, I do not consider the proposed amendments to be necessary. The objective as notified clearly distinguishes between adaptation responses and emissions reduction, with the latter appropriately addressed through the urban form and development pattern component of the objective (clause 3). Incorporating emissions reduction within the clause relating to enabling community adaptation conflates adaptation and mitigation concepts, reducing the clarity and effectiveness of the objective. The notified wording already provides a coherent and integrated framework and is therefore preferred. Furthermore, the addition of 'and respond' is somewhat duplicative with the already notified wording of 'adapt'.
83. J Wheeler's submission seeking to replace 'enabling' with 'encourage' is not supported. National direction relating to climate change requires a proactive and directive approach to both adaptation and resilience. The term 'enable' is consistent with this approach, as it signals that the planning framework will actively facilitate and support community adaptation. 'Encourage' is a more passive term that I consider would weaken the effectiveness of the objective by reducing the expectation that adaptation will be provided for.
84. The amendments proposed by HCES seek to strengthen clauses 2 and 3 by introducing 'actively facilitating'. However, I consider that this does not provide a substantive improvement. The term 'enable' is already sufficiently directive, aligns with national direction, and better reflects the role of the planning framework. Replacing 'encouraging' with 'actively facilitating' overstates the level of control a district plan has and reduces precision. While the emphasis on protecting, restoring and enhancing ecosystems is generally consistent with national direction, it is not supported here due to the withdrawal of the Ecosystems and Indigenous Biodiversity chapter, leaving no implementation framework. Adopting more directive wording would therefore create expectations of intervention not supported elsewhere in the plan.
85. The EDS submission seeks for strengthened wording so that climate change is central to natural hazards management¹⁴. While it is accepted that climate change is an important component of natural hazards management, this is already appropriately provided for within the strategic direction framework. SD-RRNH-O2 explicitly recognises the need to take climate change into account in natural hazards management, and the natural hazards objective SD-RRNH-O1 focuses on achieving resilience and risk reduction outcomes. These objectives perform complementary but distinct functions and together provide an

¹⁴ This submission point is opposed by WPGI in their further submission [FS562]

integrated response. Amending the objective is not necessary and would reduce the clarity and effectiveness of the strategic framework by conflating broader climate change matters with the more specific focus of natural hazards management.

86. The submission by Kā Rūnaka is accepted in part. The inclusion of a specific reference to ‘coastal hazards’ alongside natural hazards is supported, as coastal hazards are addressed separately within the plan and explicit recognition improves clarity and consistency in the strategic framework. However, the remainder of the proposed amendments are not supported. While generally consistent in intent with national direction, they introduce a level of detail and specificity that is more appropriate for policies or methods, including matters relating to information inputs, mātauraka Kāi Tahu, and assessment processes. The notified objective appropriately focuses on the outcomes to be achieved through an integrated management approach and provides a clear and concise framework.
87. In regard to the Forest and Bird submission¹⁵, while the intent to recognise the resilience of ecosystems, including indigenous habitats and species, to the effects of climate change is consistent with national direction, the proposed wording relies on an implementation framework that is no longer provided for in the plan. In particular, the Ecosystems and Indigenous Biodiversity chapter, which would typically support such outcomes, has been withdrawn, and there are no comprehensive provisions to give effect to the level of intervention requested by the submitter.
88. Fish and Game raises the need for emission reduction direction at a strategic level but does not seek specific relief. I consider that the objective already addresses emissions reduction through clause 3 which encourages efficiency in urban form, settlement and development patterns to support a low emissions environment.
89. The additional clause proposed by ORC is overly specific for a strategic objective and relates to a particular implementation method, namely the maintenance and repair of hard protection structures. Such matters are more appropriately addressed at the policy or rule level. In addition, the plan already provides for the management and maintenance of hazard mitigation structures through its implementation framework. Including this level of detail within a strategic objective would reduce its clarity and blur the distinction between objectives and methods.

7.4.3 Recommendations

90. I recommend the following changes to SD-RRNH-O2:

91. Amend SD-RRNH-O2 (Clause 1) to provide reference to ‘coastal natural hazards’ as follows:

SD-RRNH-O2	Adapting to climate change
The effects of climate change are recognised, and an integrated management approach is adopted, including through: 1, taking climate change into account in natural hazards management when managing natural hazards and coastal natural hazards; and 2, enabling the community to adapt to climate change; and 3, encouraging efficiency in urban form, settlement and development patterns to support a low emissions environment; and 4, supporting natural functioning ecosystems and processes to help build resilience into the natural and built environments.	

¹⁵ This submission point is opposed by Meridian in their further submission [FS422]

7.4.4 Evaluation

92. The recommended amendments seek to explicitly recognise coastal natural hazards within clause 1 of SD-RRNH-O2. While coastal hazards are generally encompassed within the broader definition of natural hazards, I consider that including a specific reference provides useful clarification given the distinct characteristics of coastal processes and the increasing influence of climate change, including sea-level rise and coastal erosion.
93. This is particularly relevant in the context of the PDP, where natural hazards and coastal hazards are addressed in separate chapters, and ensures this distinction is clearly captured at a strategic level.
94. The proposed amendment is considered to be a proportionate and appropriate refinement that does not alter the overall intent of the objective but improves its clarity and usability. In doing so, it is more effective and efficient in achieving the purpose of the RMA than the notified wording and is therefore recommended.

7.5 Urban form and development

95. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, 36 original submission points and 2 further submission points are addressed here.

Submitter Name	Submission Point Number(s)
Fire and Emergency New Zealand	163.12, 163.13, 163.14
Hampden Community Energy Society	232.20, 232.21, 232.22, 232.23, 232.24, 232.25
KiwiRail Holdings Limited	233.19, 233.20
Cormorants on Waterfront Limited	235.4, 235.5, 235.6
Telecommunication Companies	244.29, 244.30, 244.31, 244.32
NPHS Te Waipounamu	164.2, 164.3
Kāinga Ora	168.4
Horticulture New Zealand	166.18
Alliance Group Limited	190.18, 190.19
New Zealand Pork Industry Board	195.14
PowerNet Limited	197.20
Fuel Companies	238.13
Whitestone Contracting Limited	243.6, 243.7
Network Waitaki Limited	288.22
Graymont (NZ) Limited	310.29
Ministry of Education Te Tāhuhu o Te Mātauranga	242.10, 242.11

Submitter Name	Submission Point Number(s)
Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	251.37
OceanaGold (New Zealand) Limited	295.77
Transpower New Zealand Limited	309.33
Further Submitter Name	Further Submission Point Number(s)
KiwiRail Holdings Limited	244.29
Royal Forest and Bird Protection Society of New Zealand Incorporated	251.37, 295.77
St Kevin's College	242.10

7.5.1 Submissions

96. There was broad support for SD-UFD-O1 and its focus on achieving good quality urban form through integration with infrastructure.
97. FENZ [163.12], KiwiRail [233.19], and the Telcos [244.29] supported retaining the objective as notified, emphasising the importance of infrastructure integration, including infrastructure that supports emergency response operations.
98. HCES [232.20] supported the objective but considered the wording too weak and sought stronger emphasis on urban form being based on sustainable design and infrastructure integration. COWL [235.4] also supported the intent of the objective but sought amendments to clarify that it 'encourages' good quality design and infrastructure integration 'where appropriate'.
99. Submitters generally supported the direction of SD-UFD-O2 providing a range of housing types and enabling higher-density housing in locations supported by infrastructure.
100. FENZ [163.13], KO [168.4], and the Telcos [244.30] supported the objective as notified, particularly the link between housing intensification and infrastructure availability.
101. NPHS [164.2] supported the objective as diverse, affordable, and healthy housing contributes positively to community health outcomes, including meeting the needs of vulnerable populations.
102. HCES [232.21] supported the objective but sought amendments to strengthen alignment with sustainable design principles and to promote higher-density housing in locations with good access to infrastructure, services, active transport, and public transport.
103. There was broad support for SD-UFD-O3, particularly its role in promoting compatible land uses and managing reverse sensitivity effects.
104. HortNZ [1665.18], Alliance [190.18], NZ Pork [195.14], PowerNet [197.20], Network Waitaki [288.22], Fuel Companies [238.13], KiwiRail [233.20], HCES [232.22], and the Telcos [244.31] supported the objective as notified, with several specifically endorsing provisions that avoid reverse sensitivity effects and protect infrastructure and industrial activities.

105. COWL [235.5] supported the overall intent but considered the objective should better recognise adaptive re-use of existing buildings, mixed-use development, and the role these play in supporting vibrant town centres and heritage precincts.
106. WCL [243.6] opposed the objective, seeking explicit recognition that some activities must locate according to their functional or operational needs.
107. Graymont [310.29] similarly sought amendments to recognise the functional needs of activities such as mineral extraction and other industries when determining appropriate locations.
108. Submitters generally supported the intent of SD-UFD-O4 for liveable, connected, accessible, and safe urban environments and rural settlements.
109. NPHS [164.3] supported the objective as notified, including its distinction between urban and rural settlements and recognition that they face different environmental challenges.
110. HCES [232.23] sought amendments to promote greater community resilience and self-sufficiency in response to broader economic and social uncertainties. COWL [235.6] supported the objective but sought the addition of 'vibrant' to further strengthen the desired urban outcomes. MOED [242.10] supported the objective in part but requested explicit recognition of existing, upgraded, and new infrastructure, including educational facilities, to support future growth and development.
111. Submitters generally supported the growth management approach of SD-UFD-O5, with some seeking broader recognition of infrastructure and resource requirements.
112. Alliance [190.19] and the MOED [242.11] supported the objective as notified, recognising the need for sufficient land to accommodate industrial and social infrastructure requirements.
113. HCES [232.24] supported the objective but sought amendments emphasising integrated land management, sustainable growth, and community self-sufficiency.
114. WCL [243.7] opposed the objective, seeking that it should acknowledge the need for accessible resources to enable the construction, maintenance, and upgrading of buildings and infrastructure, and sought corresponding amendments.
115. There was general support for SD-UFD-O6 and its emphasis on ensuring urban growth is supported by infrastructure.
116. FENZ [163.14] and the Telcos [244.32] supported retaining the objective as notified, recognising the importance of appropriately serviced urban growth.
117. HCES [232.25] supported the intent of the objective but questioned growth as an objective in itself, seeking amendments to focus on appropriately located and serviced development while ensuring future urban growth areas remain available for residential development.

7.5.2 Analysis

118. The submission from HCES seeks to replace 'good quality design' with 'sustainable design' in SD-UFD-O1. While sustainability is an important outcome supported

elsewhere in the plan and higher order direction, the proposed amendment would narrow the focus of the objective and elevate a particular design outcome without a clear implementation framework. The notified reference to ‘good quality design’ is broader and more flexible, encompassing sustainability alongside other outcomes such as functionality, amenity, and integration with infrastructure. As a strategic objective, SD-UFD-O1 is intended to provide high-level direction rather than prescribe specific design outcomes. Sustainability is more appropriately addressed through other Plan provisions and national direction.

119. The proposed amendment to SD-UFD-O1 from COWL will lessen the intent and effectiveness of the objective by introducing discretionary language and an implicit opt-out through the qualifier ‘where appropriate’. The notified wording establishes a clear expectation that urban form will achieve good quality design and be integrated with infrastructure. In contrast, replacing this with ‘encourages’ reduces the directive nature of the objective, and the addition of ‘where appropriate’ introduces uncertainty as to when the outcome is expected to be achieved. I consider that this reduces the clarity and consistency of the strategic direction. As a strategic objective, SD-UFD-O1 appropriately sets a strong and certain expectation for urban form outcomes. Diluting this direction risks undermining the ability of the plan to deliver well-functioning urban environments and integrated infrastructure outcomes.
120. HCES seeks to amend SD-UFD-O2 by introducing references to sustainable design, the 15-minute walking principle, and additional locational criteria for intensification. While the intent is acknowledged, I consider that these amendments introduce unnecessary prescription within a strategic objective and rely on concepts that are not defined or supported elsewhere in the Plan. The notified objective provides an appropriate level of high-level direction, while retaining flexibility for different parts of the district.
121. COWL seeks to add a clause to SD-UFD-O3 encouraging mixed-use development and the adaptive reuse of buildings in town centres and heritage precincts. While the intent is acknowledged, I consider these matters to be more appropriately addressed through zone-specific provisions and existing heritage objectives, including SD-CHI-O2. SD-UFD-O3 is primarily focused on the location and compatibility of activities across the district. Introducing a district-wide direction for mixed-use development would broaden the scope of the objective and may create inconsistency with zones where such development is not anticipated or enabled.
122. The submissions from WCL and Graymont seek to add a clause to SD-UFD-O3 recognising activities with functional and operational needs. While the intent is acknowledged, I consider the notified objective already provides for the appropriate location of activities through its focus on the efficient use of land, resources, and infrastructure, and the management of compatibility effects. A separate clause is therefore unnecessary and may introduce uncertainty through broad and undefined wording. More specific recognition of functional and operational needs is better addressed through zone-specific provisions and policies.
123. HCES seeks to amend SD-UFD-O4 by adding descriptors including ‘self-supporting’, ‘vibrant’, and ‘resilient’. While the intent is acknowledged, only part of the amendment is

supported. I consider that the inclusion of ‘vibrant’ and ‘resilient’ would strengthen the objective and aligns with well-functioning urban environments. However, I consider the term ‘as far as possible’ would reduce the certainty of the objective, and ‘self-supporting’ is unclear, undefined, and difficult to implement through the District Plan framework. Similarly, COWL also seek to strengthen the objective through the addition of the term ‘vibrant’, which is also supported for the reasons above.

124. The submission from MOED seeks to amend SD-UFD-O4 to require urban environments and rural settlements to be adequately serviced by existing, upgraded, or new infrastructure¹⁶. While the importance of infrastructure is acknowledged, this matter is already addressed elsewhere in the strategic framework, including SD-UFD-O1. The proposed amendment would introduce unnecessary duplication and operational detail into a strategic objective. SD-UFD-O4 is intended to focus on the qualities of the urban environment, while infrastructure provision is more appropriately addressed through policies and lower-order provisions. Accordingly, I consider the notified wording to be the most appropriate.
125. HCES seeks to amend SD-UFD-O5 by replacing the notified wording with references to ‘integrated land management principles’ and ‘sustainable housing’. While the intent is acknowledged, the proposed amendments are not supported. The notified objective already provides clear direction for cohesive, compact, and structured growth while ensuring a sufficient supply of land to meet the district’s needs. The proposed changes would introduce undefined terminology, reduce the clarity of the objective, and weaken the existing focus on growth management and development capacity. The notified wording is therefore considered the most effective and appropriate approach.
126. The submission from WCL seeks to amend SD-UFD-O5 by adding ‘and resources’ to the phrase ‘sufficient supply of land’. While the intent is acknowledged, the amendment is not supported. The notified wording uses the well-established planning concept of land supply, which is directly linked to development capacity and growth. By contrast, ‘resources’ is broad and undefined, creating uncertainty as to its meaning and application. The management of resources is also addressed elsewhere in the Plan and wider resource management framework.
127. The submission from HCES seeks to amend SD-UFD-O6 by replacing ‘Future urban growth’ with ‘Any future urban growth and development’. While the intent appears to broaden the scope of the objective, the proposed amendments are not supported. The notified wording already clearly captures future urban growth as the focus of the objective, and the addition of ‘any’ and ‘development’ is unnecessary. These changes do not materially alter the meaning of the provision but introduce redundancy and reduce the precision and conciseness of the wording. In particular, the inclusion of ‘development’ broadens the scope beyond the intended focus on urban growth, which may blur the distinction between strategic growth planning and the wider management of development addressed elsewhere in the plan. The current wording appropriately targets the location and servicing of growth areas, which is the purpose of this objective. Overall,

¹⁶ This submission is supported by St Kevins College in their further submission [FS306]

the proposed amendments do not improve the effectiveness of the objective and instead introduce unnecessary wording and minor ambiguity without substantive benefit.

7.5.3 Recommendations

128. I recommend the following changes to SD-UFD-O3:

129. Amend SD-UFD-O3 to add in a new clause 5 as follows¹⁷:

SD-UFD-O3	Location of activities
The location of activities is managed to: 1, ensure the efficient use of land, resources, and infrastructure; and 2, maintain the character and amenity values of different parts of the District; and 3, establish compatible activities with similar effects and functions together in appropriate areas; and 4, avoid potential reverse sensitivity effects and otherwise minimise adverse effects from incompatible activities; and 5. support Te Mana o te Wai.	

130. I recommend the following changes to SD-UFD-O4:

131. Amend SD-UFD-O4 to add in the terms ‘vibrant’ and ‘resilient’ as follows:

SD-UFD-O4	The urban environment
The District has urban environments and rural settlements that are <u>vibrant, resilient</u>, liveable, connected, accessible, safe and well-designed for the community to live, work and play.	

7.5.4 Evaluation

132. The recommended amendment to SD-UFD-O3 recognises the importance of Te Mana o te Wai within the District Plan's strategic framework and gives effect to higher-order freshwater direction. Including this concept in SD-UFD-O3 acknowledges that decisions about the location and management of activities can influence freshwater outcomes and reinforces the integrated management approach underpinning the Plan.

133. However, there is a degree of tension between the subject matter of the objective and the proposed amendment. SD-UFD-O3 is primarily focused on the efficient location of activities, land use compatibility, and the management of reverse sensitivity effects. The addition of a standalone clause relating to Te Mana o te Wai introduces a freshwater management outcome that is not directly related to the other clauses of the objective. While the amendment broadens the scope of the objective, it does not undermine its intent and may provide a useful strategic linkage between urban development and freshwater management, particularly given the increasing emphasis on integrated resource management.

¹⁷ Recommendation in response to Fish & Game [256.22] on SD-UFD-O3 (refer to paragraph 54 of this report for an evaluation of this submission point).

134. Overall, the proposed amendment is considered to be an appropriate refinement that broadens the overall intent of the objective to be more effective and efficient in achieving the purpose of the RMA than the notified wording and is therefore recommended.
135. The addition of the terms ‘vibrant’ and ‘resilient’ to SD-UFD-O4 further strengthens the description of the urban environments and rural settlements sought by the Plan without materially changing the objective's intent.
136. ‘Vibrant’ recognises the importance of active, attractive, and prosperous urban places that support social and economic wellbeing, while ‘resilient’ acknowledges the ability of communities and settlements to adapt to change, recover from adverse events, and respond to future challenges. Both concepts are widely used in contemporary planning practice and are consistent with achieving well-functioning urban environments.
137. The amendment also responds to submission points seeking greater recognition of community wellbeing and adaptability, while avoiding the uncertainty associated with terms such as ‘self-supporting’. The revised wording remains concise, clear, and outcome-focused, and improves the effectiveness of the objective by more fully describing the qualities sought for the district’s settlements.
138. Overall, the amendment represents a proportionate refinement that enhances the objective while maintaining its strategic role and readability.

8 Conclusion

139. As discussed within Parts 3 to 7 of this s42A Report, a wide range of submissions and further submissions have been received with respect to the Strategic Direction provisions within the PDP.
140. Submissions have been analysed, with my recommendations set out at Appendix 1 of this report.
141. Having considered all the submissions and reviewed all relevant statutory and non-statutory documents, I recommend that the PDP should be amended as set out in Appendix 1 of this report.
142. For the reasons set out in the evaluation sections included throughout this report, I consider that the proposed objectives, with the recommended amendments, will be the most appropriate means to:
 - Achieve the purpose of the RMA where it is necessary to revert to Part 2 and otherwise give effect to higher order planning documents, in respect to the proposed objectives, and
 - Achieve the relevant objectives of the Proposed District Plan, in respect to the proposed provisions.

Appendix 1

Recommended Changes to Provisions

Strategic Direction

Introduction

The Strategic Direction chapter sets the overarching direction for the District Plan to sustainably manage growth, land use and development in the Waitaki district. The strategic direction objectives help to implement relevant WDC plans, strategies, and policies as well as regulatory planning documents and legislation that the District Plan must give effect to. The strategic direction objectives reflect the intended outcomes to be achieved through the implementation of the District Plan.

For the purposes of preparing, changing, interpreting, and implementing this District Plan, the objectives and policies in all other chapters of the District Plan are to be expressed and achieved in a manner consistent with the objectives of this Chapter.

~~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. The strategic direction objectives provide overarching direction for the Plan and are particularly relevant to future plan changes and to the assessment of discretionary or non-complying resource consent applications and notices of requirement. Where relevant, they are to be considered alongside the objectives and policies of topic chapters.~~¹⁸

The Waitaki district spans a diverse range of coastal, rural, and high-country landscapes, encompassing valued landscapes, historic and cultural heritage, productive rural land, urban settlements, and rural communities. Key challenges facing the district include growth, rural character, natural hazards, climate change, the provision of open space and recreation, nationally significant infrastructure, renewable energy, alongside recognition of mana whenua relationships. The Strategic Direction objectives provide an integrated framework to guide development, support resilience, and protect the district's character and values.¹⁹

¹⁸ OceanaGold [295.77] and Transpower [309.33]

¹⁹ FFNZ [246.42]

Risk, resilience, and natural hazards

SD-RRNH-O2	Adapting to climate change
The effects of climate change are recognised, and an integrated management approach is adopted, including through: 1. taking climate change into account in natural hazards management when managing natural hazards and coastal natural hazards²⁰; and 2. enabling the community to adapt to climate change; and 3. encouraging efficiency in urban form, settlement and development patterns to support a low emissions environment; and 4. supporting natural functioning ecosystems and processes to help build resilience into the natural and built environments.	

Urban form and development

SD-UFD-O3	Location of activities
The location of activities is managed to: 1. ensure the efficient use of land, resources, and infrastructure; and 2. maintain the character and amenity values of different parts of the District; and 3. establish compatible activities with similar effects and functions together in appropriate areas; and 4. avoid potential reverse sensitivity effects and otherwise minimise adverse effects from incompatible activities; and 5. support Te Mana o te Wai²¹.	

SD-UFD-O4	The urban environment
The District has urban environments and rural settlements that are <u>vibrant, resilient,</u>²² liveable, connected, accessible, safe and well-designed for the community to live, work and play.	

²⁰ Kā Rūnaka [251.46]

²¹ Fish & Game [256.22]

²² HCES [232.23] and COWL [235.6]

Appendix 2

Recommended Responses to Submissions

Sub No.	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
188.9	Mackenzie District Council	Strategic Direction	General	Support	Considers that it would be beneficial to have a strategic objective that covers the need for agency alignment on the Mackenzie Basin / Te Manahuna to provide for improved alignment and consistency between effects and the 'methods' by which they are to be managed.	Seeks that an additional Strategic Direction objective is inserted as follows: <u>SD NE-Ox Mackenzie Basin / Te Manahuna</u> <u>Recognise the outstanding natural values of the Mackenzie Basin / Te Manahuna and the need for plan alignment and collaboration between local authorities and other government agencies.</u>	Reject
194.21	Director-General of Conservation	Strategic Direction	General	Support	Supports in part the 'Strategic direction' Chapter provisions as they provide useful high-level guidance.	Retain the 'Strategic direction' Chapter as notified, except where specific changes are requested below.	Accept
198.2	Aquaculture New Zealand	Strategic Direction	General	Oppose	Considers that the PDP does not adequately acknowledge the uniqueness of aquaculture activity, its sustainability credentials, nor recognise the significant potential to grow its contribution to the economic and social fabric of the district and the country.	Provide acknowledgement and support for new aquaculture activities in the Strategic Direction Chapter and other provisions of the PDP.	Reject
204.2	River-T Wines	Strategic Direction	General	Amend	Considers that viticulture in Waitaki is a regionally significant activity that supports regional branding and tourism, promotes high-value, low-impact land use, and helps preserve landscape values and rural character.	Seeks to include policy recognition of viticulture as a key strategic land use that must be safeguarded from incompatible development.	Reject
205.2	Waitaki Winegrowers Association	Strategic Direction	General	Amend	Considers that viticulture in Waitaki is a regionally significant activity that supports regional branding and tourism, promotes high-value, low-impact land	Seeks to include policy recognition of viticulture as a key strategic land use that must be safeguarded from incompatible development.	Reject

Sub No.	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
					use, and helps preserve landscape values and rural character.		
206.2	Sublime Wine	Strategic Direction	General	Amend	Considers that viticulture in Waitaki is a regionally significant activity that supports regional branding and tourism, promotes high-value, low-impact land use, and helps preserve landscape values and rural character.	Seeks to include policy recognition of viticulture as a key strategic land use that must be safeguarded from incompatible development.	Reject
207.2	Little Domett Estate	Strategic Direction	General	Amend	Considers that viticulture in Waitaki is a regionally significant activity that supports regional branding and tourism, promotes high-value, low-impact land use, and helps preserve landscape values and rural character.	Seeks to include policy recognition of viticulture as a key strategic land use that must be safeguarded from incompatible development.	Reject
208.2	Black Stilt Wines Ltd	Strategic Direction	General	Amend	Considers that viticulture in Waitaki is a regionally significant activity that supports regional branding and tourism, promotes high-value, low-impact land use, and helps preserve landscape values and rural character.	Seeks to include policy recognition of viticulture as a key strategic land use that must be safeguarded from incompatible development.	Reject
209.2	ACG Wines – Clos Ostler	Strategic Direction	General	Amend	Considers that viticulture in Waitaki is a regionally significant activity that supports regional branding and tourism, promotes high-value, low-impact land use, and helps preserve landscape values and rural character.	Seeks to include policy recognition of viticulture as a key strategic land use that must be safeguarded from incompatible development.	Reject
210.2	Dragon Bones Vineyard	Strategic Direction	General	Amend	Considers that viticulture in Waitaki is a regionally significant activity that supports regional branding and tourism, promotes high-value, low-impact land use, and helps preserve landscape values and rural character.	Seeks to include policy recognition of viticulture as a key strategic land use that must be safeguarded from incompatible development.	Reject

Sub No.	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
211.2	Valli Vines LTD	Strategic Direction	General	Amend	Considers that viticulture in Waitaki is a regionally significant activity that supports regional branding and tourism, promotes high-value, low-impact land use, and helps preserve landscape values and rural character.	Seeks to include policy recognition of viticulture as a key strategic land use that must be safeguarded from incompatible development.	Reject
246.42	Federated Farmers of New Zealand Incorporated	Strategic Direction	General	Support	Considers the PDP would considerably benefit from describing the specific resource management issues as relevant in the Waitaki District as it forms the foundation for effective policy analysis and decision making	Amend the Strategic Direction chapter to identify the significant resource management issues that provisions in the PDP are seeking to address, as they manifest in the Waitaki District, either: 1. As distinct issues (i.e.SD-XX-I1) expressed before the objectives; or 2. Within the Introductory text for each chapter.	Accept in part
246.47	Federated Farmers of New Zealand Incorporated	Strategic Direction	General	Support	Consider that the Strategic Direction chapter sets the overarching direction for the PDP and is particularly relevant for future plan changes and in processing any significant or complex resource consent applications. The chapter proposes a rural objective that recognises the importance of primary production (SD-RA-O1). There is also an objective of equal importance, to ensure the protection, restoration and enhancement of all natural character, landscapes, features, ecosystems and water quality of the district (SD-NE-O1). The Strategic Direction chapter does not provide any direction as to how this fundamental tension is to be managed. We believe an objective and a policy that states how such an objective will be actioned is also necessary.	Seek a provision of a new strategic objective within the PDP to describe the objective when managing potentially conflicting objectives between enabling primary production in rural areas, and the protection of natural character, landscapes, features and ecosystems. Potential wording could be: <u>Objective SD-XX-OX Balancing Productive Use and Amenity Values</u> <u>The use and development of land and resources are managed in a way that:</u> <u>1. supports the efficient and productive use of land and resources; and</u> <u>2. recognises and provides for the community's ability to enjoy the natural environment, including its open spaces, landscape character, and amenity values;</u> <u>so that a fair and enduring balance is achieved between environmental protection, economic opportunity, and social wellbeing, for the benefit of both current and future generations.</u>	Reject

Sub No.	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
						Also seek provision of a new strategic policy to describe how this objective will be implemented. Potential wording could be: Policy SD-XX-PX Balancing Productive Use and Amenity Values: <u>Manage the use and development of land and resources to:</u> <u>1. Recognise the operational needs of primary production activities.</u> <u>2. Protect key landscape, natural character, and amenity values that contribute to the district's identity and public enjoyment.</u> <u>3. Encourage design and siting that minimises adverse visual or amenity effects without placing undue constraints on land-based activities.</u> <u>4. Ensure regulation is practical and proportionate, focusing on effects that are significant or enduring.</u> Or wording to similar effect.	
253.6	Royal Forest and Bird Protection Society of New Zealand Incorporated	Strategic Direction	General	Amend	Seeks the inclusion of a new Strategic Direction for rural areas. Regarding the preservation and restoration of indigenous vegetation, habitat and biodiversity	Add the following strategic direction objective to the plan: <u>Rural areas contribute to the maintenance and restoration of indigenous vegetation and biodiversity, providing habitat and ecological corridors for indigenous species.</u>	Reject
253.7	Royal Forest and Bird Protection Society of New Zealand Incorporated	Strategic Direction	General	Amend	Seeks the inclusion of a new strategic direction objective for urban form and development. Regarding the effective management of indigenous vegetation and biodiversity in urban areas.	Add the following strategic direction objective as follows: <u>New and existing urban areas increase indigenous vegetation and biodiversity through restoration, maintenance and enhancement, and integration of ecological values.</u>	Reject

Sub No.	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
256.22	Fish and Game (Otago and Central South Island Fish and Game Councils)	Strategic Direction	General	Amend	Seeks to include Te Mana o Te Wai as a core concept per NPSFM 2020 (1.3(2)), making it central to all freshwater management in the district plan. Further guidance is in ORC RPS 2021.	Seeks to amend and develop new objective in strategic direction, and insert reference in to Te Mana O Te Wai in SD-UFD-O3 Location of activities – (5) Support Te Mana O Te Wai.	Accept
265.1	Geoff and Katrina Taylor	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	Accept
267.1	Kelvin and Debbie Weir	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	Accept
269.1	Brenda & Ken McLeod	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	Accept
271.66	Canterbury Regional Council	Strategic Direction	General	Support	Amend 'The Strategic Direction' to include an Objective to cover the need for agency alignment on the Makenzie Basin: <u>SD-NE-OX Mackenzie Basin</u> <u>Recognise the outstanding natural values of the Mackenzie Basin and the need for plan alignment and collaboration between local authorities and other government agencies.</u>	Amend 'The Strategic Direction' to include an Objective to cover the need for agency alignment on the Makenzie Basin: <u>SD-NE-OX Mackenzie Basin</u> <u>Recognise the outstanding natural values of the Mackenzie Basin and the need for plan alignment and collaboration between local authorities and other government agencies.</u>	Reject
282.1	Dogterom Thomson Ltd	Strategic Direction	General	Support	In general support of Strategic Direction chapter, in particular the historical and cultural identity and values, and the	Retain as notified	Accept

Sub No.	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
					rural areas. [Refer to original submission for full reasons]		
283.1	Dogterom Hohepa Ltd	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	Accept
284.1	Dogterom Duntroon Ltd	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	Accept
285.1	Barry and Anne Matthews	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	Accept
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	Accept
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	Accept
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	Accept

Sub No.	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
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	Accept
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.	Reject
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	Accept
297.1	Parkside Holdings Ltd	Strategic Direction	General	Support	Support strategic direction	retain as notified	Accept
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	Accept
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.	Accept
300.1	Adrianus and Francisca Verbakel & others	Strategic Direction	General	Support	Supports Strategic Direction chapter as notified.	Retain Strategic Direction chapter as notified, including SD-RA-O1, SD-RA-O2, SD-RA-O3.	Accept

Sub No.	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
					[Refer to original submission for full reasons]		
301.1	Carolyn Thelning	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	Accept
302.1	Peter and Sandra Mitchell	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	Accept
303.1	Terry and Fiona Conlan	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 Strategic direction chapter as notified.	Accept
304.1	Kirsty and Nathan McLachlan	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	Accept
312.1	Springbank	Strategic Direction	General	Support	Supports The submitters consider the following. Rural production activities are important to the district and should be supported within the rural zone. Primary production should be prioritised on highly productive land and protected from incompatible activities. Rural communities can be significantly affected by land-use change, so socio-economic impacts and rural resilience must be considered. Some	Relief sought: retain Strategic Direction as proposed.	Accept

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					district plan provisions may unnecessarily constrain activities on rural properties. The submission expresses support for the Strategic Direction chapter, particularly its focus on rural identity, history and cultural values.		
313.1	Geoff & Jan Keeling - Keeling Dairies Limited	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 Strategic direction chapter as notified.	Accept
227.2	Janice Wheeler	Strategic Direction	SD-CHI-O1 Character and Identity Waitaki's character, historic and cultural heritage,	Oppose	Considers that the overarching principles of the Plan's Strategic Direction in SD-CHI-O1 have and continue to include Pioneer Farming that is maintained and supported to thrive.	Seeks SD-CHI-O1 'Character and Identity' be retained albeit with the following amendment: ... SD-CHI-O1 Character and Identity Waitaki's character, historic <u>farming</u> and cultural heritage, and identity is recognised and protected throughout the District. ...	Reject
232.2	Hampden Community Energy Society	Strategic Direction	SD-CHI-O1 Character and Identity Waitaki's character, historic and cultural heritage,	Support	Supports SD-CHI-O1 'Character and Identity' as it complements and supports the intent of SD-CFOS-O1.	Retain SD-CHI-O1 as proposed.	Accept
235.1	Cormorants on Waterfront Limited	Strategic Direction	SD-CHI-O1 Character and Identity Waitaki's character,	Support	Supports recognising and protecting the important value that historic and cultural heritage contributes to the character and identity of Waitaki.	Retain	Accept

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			historic and cultural heritage,				
251.38	Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	Strategic Direction	SD-CHI-O1 Character and Identity Waitaki's character, historic and cultural heritage,	Amend	Supports the intent to recognise and protect character and identity, but considers the articulation and scope is unclear.	Seeks to amend to address the matters raised in this submission	Accept in part
294.13	Meridian Energy Limited	Strategic Direction	SD-CHI-O1 Character and Identity Waitaki's character, historic and cultural heritage,	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.	Reject
295.78	OceanaGold (New Zealand) Limited	Strategic Direction	SD-CHI-O1 Character and Identity Waitaki's character, historic and cultural heritage,	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, historic heritage or cultural areas, rather than requiring full protection to better align with the RMA and support appropriate development within the SPZMM.	Seeks to amend as follows: Waitaki's character, historic and cultural heritage, and identity is recognised and <u>the values</u> protected throughout the District.	Reject
309.34	Transpower New Zealand Limited	Strategic Direction	SD-CHI-O1 Character and Identity Waitaki's character, historic and cultural heritage,	Amend	Opposes the absolute protection in the objective for character and identity and recommends focusing on protecting the values of features instead.	Seeks to amend as follows: Waitaki's character, historic and cultural heritage, and identity is recognised and <u>their values are</u> protected throughout the District.	Reject

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148.3	Helen Stead	Strategic Direction	SD-CHI-O2 Recognition, protection, and future opportunities for Waitaki's heritage Reco	Support	Supports the strategic direction objective that protects the aesthetic, structural and heritage values of the historic buildings in Ōamaru.	Retain SD-CHI-O2 (Recognition, protection, and future opportunities for Waitaki's heritage).	Accept
232.3	Hampden Community Energy Society	Strategic Direction	SD-CHI-O2 Recognition, protection, and future opportunities for Waitaki's heritage Reco	Support	Supports the intent of SD-CHI-O2 'Recognition, protection, and future opportunities for Waitaki's heritage' but considers that some key buildings in the heritage quarter that have been modified need to be at least refaced to enhance the streetscape in keeping with the Victorian theme.	Seeks that SD-CHI-O2 is amended as follows: Recognise the outstanding contribution that historic heritage makes to the Waitaki district by protecting buildings, items, areas and features and providing opportunities for the ongoing use, <u>refurbishment</u> and adaptive re-use of our heritage buildings and areas.	Reject
232.26	Hampden Community Energy Society	Strategic Direction	SD-CHI-O2 Recognition, protection, and future opportunities for Waitaki's heritage Reco	Support	Supports SD-CHI-O2 'Recognition, protection, and future opportunities for Waitaki's heritage' as it complements objectives SD-CFOS-O1 and SD-CHI-O1.	Supports SD-CHI-O2 subject to amendment. [See Submission 232.3]	Reject
235.2	Cormorants on Waterfront Limited	Strategic Direction	SD-CHI-O2 Recognition, protection, and future opportunities for Waitaki's heritage Reco	Support	Supports recognising the importance of protection of historic areas in Waitaki and enabling the ongoing use and adaptive re-use of heritage areas.	Retain	Accept
251.39	Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	Strategic Direction	SD-CHI-O2 Recognition, protection, and future opportunities for Waitaki's heritage Reco	Support	Considers the objective is an appropriate way to give effect to RMA s6(f).	Seeks to retain as notified.	Accept

Sub No.	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
257.14	Heritage New Zealand Pouhere Taonga (HNZPT)	Strategic Direction	SD-CHI-O2 Recognition, protection, and future opportunities for Waitaki's heritage Reco	Support	Supports the inclusion of the strategic direction for "Recognition, protection, and future opportunities for Waitaki's heritage", acknowledging the wider role of heritage in the district and its scientific, sociological, and philosophical connection to the past. Notes that connection to place and identity is fundamental to New Zealand society and New Zealanders' wellbeing.	Seeks to adopt the strategic direction for Recognition, protection, and future opportunities for Waitaki's heritage as notified.	Accept
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 generation activities without proper consideration of their effects or national significance.	Seeks to delete the objective	Reject
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, historic heritage or cultural areas, rather than requiring full protection to better align with the RMA and support appropriate development within the SPZMM.	Seeks to amend as follows: Recognise the outstanding contribution that historic heritage makes to the Waitaki district by protecting <u>the heritage values of</u> buildings, items, areas and features and providing opportunities for the ongoing use and adaptive re-use of our heritage buildings and areas.	Reject
309.35	Transpower New Zealand Limited	Strategic Direction	SD-CHI-O2 Recognition, protection, and future opportunities for Waitaki's heritage Reco	Amend	Opposes the absolute protection of historic heritage and suggests the objective should focus on protecting heritage values.	Seeks to amend as follows: Recognise the outstanding contribution that historic heritage makes to the Waitaki district by protecting <u>the heritage values of</u> buildings, items, areas and features and providing opportunities for the ongoing use and adaptive re-use of our heritage buildings and areas.	Reject

Sub No.	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
310.23	Graymont (NZ) Limited	Strategic Direction	SD-CHI-O2 Recognition, protection, and future opportunities for Waitaki's heritage Reco	Amend	The submitter acknowledges the historic heritage value of its Makareao Plant and Quarry site, which contains remnants of the former lime works and falls partly within a heritage overlay but seeks a minor amendment to recognise that full protection may not always be practicable where existing lawful activities operate, and requests the overlay exclusion be updated to refer to "limeworks" instead of "Taylor's Lime" [refer submission point 310.24]	Seeks to amend as follows: Recognise the outstanding contribution that historic heritage makes to the Waitaki district by protecting buildings, items, areas and features, <u>to the greatest extent practicable</u> and providing opportunities for the ongoing use and adaptive re-use of our heritage buildings and areas.	Reject
163.10	Fire and Emergency New Zealand	Strategic Direction	SD-RRNH-O2 Adapting to climate change The effects of climate change are recognised, and	Support	Supports the objective.	Retain as notified.	Accept
166.19	Horticulture New Zealand	Strategic Direction	SD-RRNH-O2 Adapting to climate change The effects of climate change are recognised, and	Support	Support in part. Supports an objective that seeks to enable the community and activities to adapt to climate change.	Seeks to amend as follows: 2. enabling the community <u>and activities</u> to adapt to climate change;	Reject
192.11	New Zealand Carbon Farming Group	Strategic Direction	SD-RRNH-O2 Adapting to climate change The effects of climate change are recognised, and	Support	Supports in part SD-RRNH-O2 'Adapting to climate change' as it integrates natural processes that provide opportunities for natural hazard risk reduction, climate change adaptation and opportunities for natural functioning ecosystems. The Submitter seeks a limited amendment to the Objective to include specific mention of the role of emissions reduction in a manner that is consistent with New Zealand's Emissions Reduction Plan made in	Amend Objective SD-RRNH-O2 as follows: "The effects of climate change are recognised, and an integrated management approach is adopted, including through: 1. taking climate change into account in natural hazards management; and 2. enabling the community to adapt <u>and respond</u> to climate change, <u>including through emissions reduction</u> ; and	Reject

Sub No.	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
					accordance with section 5Z1 of the Climate Change Response Act 2002.	3. encouraging efficiency in urban form, settlement and development patterns to support a low emissions environment; and 4. supporting natural functioning ecosystems and processes to help build resilience into the natural and built environments.”	
195.10	New Zealand Pork Industry Board	Strategic Direction	SD-RRNH-O2 Adapting to climate change The effects of climate change are recognised, and	Amend	Support in part an objective that seeks to enable the community and activities to adapt to climate change.	Amend as follows: 2. enabling the community <u>and activities</u> to adapt to climate change;	Reject
227.5	Janice Wheeler	Strategic Direction	SD-RRNH-O2 Adapting to climate change The effects of climate change are recognised, and	Oppose	Considers that: SD-RRNH-O2 'Natural hazards' should be amended to delete-'enabling' in list [clause] 2. and add 'encourage' the community to adapt to climate change in towns (with solar panels, rainwater tanks. flax planting for wet sections).	Seeks that SD-RRNH-O2 'Natural hazards' is amended as follows: ... 2. enabling <u>encourage</u> the community to adapt to climate change; and ...	Reject
232.12	Hampden Community Energy Society	Strategic Direction	SD-RRNH-O2 Adapting to climate change The effects of climate change are recognised, and	Support	Considers with SD-RRNH-O2 'Adapting to climate change' that climate change is upon us and the objective is supported as it enables use and development within the NH Overlays that do not increase the risk from NH to people, property and infrastructure.	Seeks that SD-RRNH-O2 is amended tor sensitivity to impacts and the hazards posed to lives and wellbeing as follows: The effects of climate change are recognised, and an integrated management approach is adopted, including through: ... 2. <u>actively facilitating</u> enabling the community to adapt to climate change; and 3. <u>actively facilitating</u> encouraging efficiency in urban form, settlement and development patterns to support a low emissions environment; and	Reject

Sub No.	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
						4. <u>protection, restoration and enhancement of supporting</u> natural functioning ecosystems and processes to help build resilience into the natural and built environments. ...	
240.17	Environmental Defence Society Incorporated (EDS)	Strategic Direction	SD-RRNH-O2 Adapting to climate change The effects of climate change are recognised, and	Support	Support in part. Considers this policy needs to be strengthened so that climate change is central to natural hazards management.	Seeks amendments for the reasons provided.	Reject
251.46	Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	Strategic Direction	SD-RRNH-O2 Adapting to climate change The effects of climate change are recognised, and	Amend	Considers the direction for adapting to climate change should include clauses reflecting a ki uta ki tai (mountains to sea) approach and partnership with Kāi Tahu. The submission references relevant PORPS policies and the need to manage uncertainties and sustain life-supporting capacity. [refer to original submission]	Seeks to amend as follows: SD-RRNH-O2: Adapting to <u>and mitigating effects of</u> climate change The effects of climate change are recognised, and an integrated management approach is adopted, including through: <u>An integrated management approach enables communities to recognise and adapt to the effects of climate change, including by:</u> 1. taking climate change into account n<u>when managing natural hazards and coastal natural hazards management</u>; and 2. <u>incorporating best available information, including mātauraka Kāi Tahu, when identifying and assessing the effects of climate change; and enabling the community to adapt to climate change;</u> 3. encouraging efficiency in urban form, settlement and development patterns to support a <u>resilient</u> low emissions environment; and 4. supporting natural functioning <u>and interconnections in</u> ecosystems and processes	Accept in part

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						to help build resilience into the natural and built environments; <u>and</u> <u>5. sustaining and enhancing the environment's life-supporting capacity when providing for mitigation and adaptation measures.</u>	
253.3	Royal Forest and Bird Protection Society of New Zealand Incorporated	Strategic Direction	SD-RRNH-O2 Adapting to climate change The effects of climate change are recognised, and	Support	Supports in part. Clause 4 to be reworded, ensuring that indigenous species and habitats are enabled to move and be resilient to the effects of climate change.	Amend clause 4 as follows: 4. Supporting natural functioning ecosystems and processes to help build resilience into the natural and built environments <u>adjustments induced by the effects of climate change to ecosystems and processes, so indigenous habitats and species are resilient to the effects of climate change.</u>	Reject
256.21	Fish and Game (Otago and Central South Island Fish and Game Councils)	Strategic Direction	SD-RRNH-O2 Adapting to climate change The effects of climate change are recognised, and	Amend	Considers needing to include strategic direction to reduce emissions, as discussed in later chapters. Useful to have high level direction to guide more detailed provisions.	No relief sought	Reject
259.17	Otago Regional Council	Strategic Direction	SD-RRNH-O2 Adapting to climate change The effects of climate change are recognised, and	Support	Support in part. Considers the objective generally appropriate but lacking recognition of mitigation measures in the adaptation process.	Seeks to add additional clause as follows: <u>5. recognising and providing for the maintenance and repair of existing hard protection structures that provide for the management of natural hazards.</u>	Reject
163.12	Fire and Emergency New Zealand	Strategic Direction	SD-UFD-O1 Integrated management Urban form comprises good quality design and integratio	Support	Supports the objective to the extent that urban form comprises good quality design and integration with infrastructure that will support emergency response operations.	Retain as notified.	Accept

Sub No.	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
232.20	Hampden Community Energy Society	Strategic Direction	SD-UFD-O1 Integrated management Urban form comprises good quality design and integratio	Support	Support with amendments as considered that the current wording is too weak and unqualified.	Seeks that SD-UFD-O1 'Integrated management' is amended as follows: Urban form comprises <u>is based on sustainable good quality</u> design and integration with infrastructure.	Reject
233.19	KiwiRail Holdings Limited	Strategic Direction	SD-UFD-O1 Integrated management Urban form comprises good quality design and integratio	Support	Support the objective for integrated management with infrastructure.	Seeks to retain as notified.	Accept
235.4	Cormorants on Waterfront Limited	Strategic Direction	SD-UFD-O1 Integrated management Urban form comprises good quality design and integratio	Support	Considers that the objective to encourage good quality design that integrates with infrastructure is supported, but the objective could be interpreted for good urban form with good quality design and infrastructure integration.	Seeks to amend as follows: 'Urban form comprises <u>encourages</u> good quality design and integration with infrastructure, <u>where appropriate</u> .'	Reject
244.29	Telecommunication Companies	Strategic Direction	SD-UFD-O1 Integrated management Urban form comprises good quality design and integratio	Support	Considers that a strategic objective recognising urban form requires integration with infrastructure is supported.	Retain as notified.	Accept
163.13	Fire and Emergency New Zealand	Strategic Direction	SD-UFD-O2 Housing choice and intensification A variety of housing types, sizes, and ten	Support	Supports the objective specifically the provision for higher density housing in locations where there is access to infrastructure (water supply and roads) and the transport network.	Retain as notified.	Accept

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164.2	NPHS Te Waipounamu	Strategic Direction	SD-UFD-O2 Housing choice and intensification A variety of housing types, sizes, and ten	Support	Supports the intention to enable a variety of housing types, sizes, and tenures to meet the community's housing needs. Considers planning for current and future population needs, particularly for vulnerable groups like children and the elderly, important as safe and affordable housing is a key determinant of health with potential health risks. Household crowding and cold and damp housing increase the risk of health issues. [See original submission for full reasons]	Retain as notified.	Accept
168.4	Kāinga Ora	Strategic Direction	SD-UFD-O2 Housing choice and intensification A variety of housing types, sizes, and ten	Support	Supports SD-UFD-O2 and its alignment with the NPS-UD.	Retain SD-UFD-O2 as notified.	Accept
232.21	Hampden Community Energy Society	Strategic Direction	SD-UFD-O2 Housing choice and intensification A variety of housing types, sizes, and ten	Support	Support with adjustment and the amendments to SD-UFD-O1. Considers that the objective must clearly align with SD-UFD-O1, focusing on housing where key services and amenity are easily accessible for certain citizens.	Amend SD-UFD-O2 'Housing choice and intensification': <u>Within a framework of sustainable design Aa</u> variety of housing types, sizes, and tenures are available across the District including: 1. housing that meets the community's diverse social, cultural and economic housing needs; and 2. provision for higher density housing in locations: a. where there is access to infrastructure, the transport network, multi-modal transport options, <u>including the 15 minute walking</u>	Reject

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						<u>principle to essential services and highly convenient public transport</u>; and b. within or near the Town Centre or a Local Centre where there is <u>ready</u> access to commercial services, community activities and public open space.	
244.30	Telecommunication Companies	Strategic Direction	SD-UFD-O2 Housing choice and intensification A variety of housing types, sizes, and ten	Support	Considers that a strategic objective recognising the need for infrastructure to support higher housing density is supported.	Retain as notified.	Accept
166.18	Horticulture New Zealand	Strategic Direction	SD-UFD-O3 Location of activities The location of activities is managed to: ensure the	Support	Supports as notified.	Retain as notified.	Accept
190.18	Alliance Group Limited	Strategic Direction	SD-UFD-O3 Location of activities The location of activities is managed to: ensure the	Support	Supports SD-UFD-O3 'Location of Activities' to support recognition of HIZ activities and the obligation to avoid, remedy and mitigate the effects of activities upon HIZ and the environment. Acknowledge and support the recognition of potential reverse sensitivity effects.	Retain SD-UFD-O3 'Location of Activities' as notified.	Accept
195.14	New Zealand Pork Industry Board	Strategic Direction	SD-UFD-O3 Location of activities The location of activities is managed to: ensure the	Support	Support objective	Retain as notified	Accept

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197.20	PowerNet Limited	Strategic Direction	SD-UFD-O3 Location of activities The location of activities is managed to: ensure the	Support	Supports this objective which seeks to protect activities from reverse sensitivity effects.	Retain as notified.	Accept
232.22	Hampden Community Energy Society	Strategic Direction	SD-UFD-O3 Location of activities The location of activities is managed to: ensure the	Support	Supports SD-UFD-O3 'Location of activities' that relate to the functional and operational need for activities to be in a location. [Inferred as specific reasons not given]	Retain SD-UFD-O3 'Location of activities' as notified.	Accept
233.20	KiwiRail Holdings Limited	Strategic Direction	SD-UFD-O3 Location of activities The location of activities is managed to: ensure the	Support	Support strategic direction for appropriate location of activities, including minimising adverse effects from incompatible activities.	Seeks to retain as notified.	Accept
235.5	Cormorants on Waterfront Limited	Strategic Direction	SD-UFD-O3 Location of activities The location of activities is managed to: ensure the	Support	Considers that the general intent of the policy to manage activities for efficient land use while maintaining character and amenity values is supported, however considers that the objective does not account for existing built form, adaptive re-use and mixed-use development in fostering vibrant town centres and heritage precincts. Given the additional economic costs of development in these areas, considers that it could become challenging to ensure the ongoing protection and sustainable management of these valued areas.	Seeks to amend as follows: ‘The location of activities is managed to: 1. ensure the efficient use of land, resources, and infrastructure; and 2. maintain the character and amenity values of different parts of the District; and 3. <u>encourage mixed use development and the adaptive reuse of buildings which positively contribute to the vibrancy of town centres and heritage precincts</u> ; and 4. establish compatible activities with similar effects and functions together in appropriate areas; and	Reject

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						5. avoid potential reverse sensitivity effects and otherwise minimise adverse effects from incompatible activities. Alternatively, include a new objective which seeks to encourage adaptive re- use which encourages vibrancy and missed use development in the District's towns centres and heritage precincts.	
238.13	Fuel Companies	Strategic Direction	SD-UFD-O3 Location of activities The location of activities is managed to: ensure the	Support	Supports objective SD-UFD-O3 The objective is supported, in particular clause (3) and (4) to establish compatible activities, minimise effects of incompatible activities, and avoidance of potential reverse sensitivity effects.	Retain as notified	Accept
243.6	Whitestone Contracting Limited	Strategic Direction	SD-UFD-O3 Location of activities The location of activities is managed to: ensure the	Oppose	Opposes this provision as it does not recognise that some activities must be located according to their functional and/or operational needs, and without this the lower order provisions of the District Plan may fail to provide for necessary activities appropriately.	Seeks to amend SD-UFD-O3 as follows: The location of activities are managed to: 1. ensure the efficient use of land, resources, and infrastructure; and 2. <u>Ensure that activities with functional and/or operational needs are provided for; and</u> ...	Reject
244.31	Telecommunication Companies	Strategic Direction	SD-UFD-O3 Location of activities The location of activities is managed to: ensure the	Support	Considers that a strategic objective recognising the need to manage the location of activities to minimise potential adverse effects is supported.	Retain as notified.	Accept
288.22	Network Waitaki Limited	Strategic Direction	SD-UFD-O3 Location of activities The location of	Support	Supports the objective as it seeks to protect activities from reverse sensitivity effects.	Retain as notified.	Accept

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			activities is managed to: ensure the				
310.29	Graymont (NZ) Limited	Strategic Direction	SD-UFD-O3 Location of activities The location of activities is managed to: ensure the	Amend	Considers that the objective should recognise the functional needs of certain activities like mineral extraction.	Seeks to amend as follows: The location of activities is managed to: 1. ensure the efficient use of land, resources, and infrastructure <u>and industry</u>; and 2. maintain the character and amenity values of different parts of the District, <u>while recognising the functional needs of particular activities</u>; and ...	Reject
164.3	NPHS Te Waipounamu	Strategic Direction	SD-UFD-O4 The urban environment The District has urban environments and rural settlement	Support	Supports both urban and rural settlements which are liveable, connected, accessible, safe and well designed for the community to live, work, and play and the differentiation between them in the PDP as their environmental hazards can be different.	Retain as notified.	Accept
232.23	Hampden Community Energy Society	Strategic Direction	SD-UFD-O4 The urban environment The District has urban environments and rural settlement	Support	Considers that SD-UFD-O4 'The urban environment' is supported with an amendment as given global uncertainty (economy, supply chains, democracy), communities should be empowered to manage their own affairs at the most reliable local organisational level.	Seeks that SD-UFD-O4 'The urban environment' is amended as follows: The district has urban environments and rural settlements that <u>as far as possible</u> are <u>self-supporting, vibrant, resilient, liveable, well-connected, accessible</u>, safe and well-designed for the community to live, work and play <u>in</u>. ...	Accept in part
235.6	Cormorants on Waterfront Limited	Strategic Direction	SD-UFD-O4 The urban environment The District has urban environments	Support	Supports the objective's intent to achieve liveable, connected, accessible safe and well-designed urban environments for the community to live, work and play. Considers that it could	Seeks to amend as follows: The District has urban environments and rural settlements that are liveable, <u>vibrant</u>, connected, accessible, safe and well-designed for the community to live, work and play.	Accept

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			and rural settlement		be strengthened by also promoting vibrancy.		
242.10	Ministry of Education Te Tāhuhu o Te Mātauranga	Strategic Direction	SD-UFD-O4 The urban environment The District has urban environments and rural settlement	Support	Supports SD-UFD-O4 in part, acknowledging the objective's focus on ensuring the urban environment and rural settlement are designed in a manner that are liveable, connected, accessible, safe and well-designed for the community to live, work and play. However, the Ministry requests that specific mention with regards to additional infrastructure is included. This aligns with the National Policy Statement for Urban Development (NPS-UD) which seeks to ensure sufficient additional infrastructure (which includes schools) is provided in urban growth and development (see Policy 10 and 3.5 of Subpart 1 of Part 3: Implementation, in particular).	Seeks to amend as follows: The urban environment The District has urban environments and rural settlements that are liveable, connected, accessible, safe and well-designed for the community to live, work and play. <u>which are adequately serviced by utilising and/or upgrading existing infrastructure or with new infrastructure or additional infrastructure.</u>	Reject
190.19	Alliance Group Limited	Strategic Direction	SD-UFD-O5 District-wide growth Waitaki grows in a cohesive, compact, and structured way	Support	Supports SD-UFD-O5 'District-wide growth' as it is important that there is sufficient supply of land available for industrial needs.	Seeks that SD-UFD-O5 'District-wide growth' is retained as notified.	Accept
232.24	Hampden Community Energy Society	Strategic Direction	SD-UFD-O5 District-wide growth Waitaki grows in a cohesive, compact, and structured way	Support	Supports with amendment to ensure that opportunities contribute to the growth and self-sufficiency in meeting the district's anticipated demand or growth rate.	Amend SD-UFD-O5 'District-wide growth' as follows: <u>Any district wide growth and development in Waitaki follows integrated land management principles, grows in a cohesive, compact, and structured way</u> while ensuring a sufficient supply of land space is available for the community's sustainable housing, commercial, industrial, and social infrastructure needs.	Reject

Sub No.	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
242.11	Ministry of Education Te Tāhuhu o Te Mātauranga	Strategic Direction	SD-UFD-O5 District-wide growth Waitaki grows in a cohesive, compact, and structured way	Support	Supports SD-UFD-O5 acknowledging the inclusion of social infrastructure which includes educational facilities.	Retain as notified.	Accept
243.7	Whitestone Contracting Limited	Strategic Direction	SD-UFD-O5 District-wide growth Waitaki grows in a cohesive, compact, and structured way	Oppose	Opposes as the provisions are deficient in that they do not recognise the importance of providing for accessible resources in order to construct, maintain, repair and upgrade buildings, structures and infrastructure.	Seeks to amend as follows: Waitaki grows in a cohesive, compact, and structured way while ensuring a sufficient supply of land <u>and resources</u> are available for the community's housing, commercial, industrial, and infrastructure needs.	Reject
163.14	Fire and Emergency New Zealand	Strategic Direction	SD-UFD-O6 Urban growth Future urban growth is appropriately located and serviced with r	Support	Supports the objective.	Retain as notified.	Accept
232.25	Hampden Community Energy Society	Strategic Direction	SD-UFD-O6 Urban growth Future urban growth is appropriately located and serviced with r	Support	Considers an amendment is necessary as with the growing list of existential threats, "growth" as an objective in and of itself is no longer appropriate. Any growth that does occur should be coherent and sensible at a landscape scale.	Amend SD-UFD-O6 <u>Any f</u> Future urban growth <u>and development</u> is appropriately located and serviced with relevant infrastructure, areas within the Future Urban Growth Overlay remain available for future urban residential development.	Reject
244.32	Telecommunication Companies	Strategic Direction	SD-UFD-O6 Urban growth Future urban growth is appropriately located and serviced with r	Support	Considers that a strategic objective recognising the need of infrastructure to support urban growth is supported.	Retain as notified.	Accept

Sub No.	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
251.37	Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	Strategic Direction	The Strategic Direction chapter sets the overarching direction for the District Plan to sustainably	Amend	Considers the chapter's introduction useful, but the objectives must also address sustaining and safeguarding the natural environment.	Seeks to amend as follows: The Strategic Direction chapter sets the overarching direction for the District Plan to sustainably manage growth, land use and development in the Waitaki district <u>while protecting the life-supporting capacity of the natural environment.</u>	Accept in part
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: <u>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.</u>	Reject
309.33	Transpower 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 Strategic Direction chapter introduction but suggests making the third paragraph more concise and clear.	Seeks to amend as follows: ... 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. <u>The strategic direction objectives may also be relevant to the assessment of resource consent applications, notices of requirement for</u>	Reject

Sub No.	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
						<u>designations, and in directing future changes to the Plan.</u>	

Appendix 3

Submissions on Withdrawn Provisions

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary
148.4	Helen Stead	Strategic Direction	SD-NE-O1 Natural character, landscapes and features and ecosystems Protection, restorat	Support	Supports the strategic direction objective to protect the natural character, landscapes and features and ecosystems, particularly in relation to protecting the natural values of rivers and the habitat of Little Blue Penguins.	Retain SD-NE-O1 (Natural character, landscapes and features and ecosystems).
188.7	Mackenzie District Council	Strategic Direction	SD-NE-O1 Natural character, landscapes and features and ecosystems Protection, restorat	Support	Supports SD-NE-O1 'Natural character, landscapes and features and ecosystems' recognising that these landscapes and ecosystems of the Mackenzie Basin are contiguous across Te Manahuna.	Retain SD-NE-O1 'Natural character, landscapes and features and ecosystems' in its entirety.
192.10	New Zealand Carbon Farming Group	Strategic Direction	SD-NE-O1 Natural character, landscapes and features and ecosystems Protection, restorat	Support	Supports SD-NE-O1 'Natural character, landscapes and features and ecosystems' as the Objective seeks the protection, restoration and enhancement of natural character, landscapes, features, ecosystems and water quality as these contribute to the district's unique character, identity, and biodiversity. The Submitter recognises the importance of these features and the responsibility of forestry operations to operate in conjunction with the natural environment. SD-NE-O1 acknowledges the management of natural and physical resources within the District.	Retain Objective SD-NE-O1 'Natural character, landscapes and features and ecosystems' as notified.
194.22	Director-General of Conservation	Strategic Direction	SD-NE-O1 Natural character, landscapes and features and ecosystems Protection, restorat	Support	Supports in part SD-NE-O1 'Natural character, landscapes and features and ecosystems', however it is drafted as an issue rather than a direction. It also refers to "areas", when the term "elements" would be more applicable.	Amend the SD-NE-O1 provision as follows, or words to similar effect: Protection, restoration and enhancement of the The natural character, landscapes, features, ecosystems and water quality of the district are protected, restored and enhanced, recognising that these areas elements strongly

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary
						contribute to Waitaki's unique character, identity, and biodiversity.
227.4	Janice Wheeler	Strategic Direction	SD-NE-O1 Natural character, landscapes and features and ecosystems Protection, restorat	Oppose	Considers that SD-NE-O1 'Natural character. landscapes and features and ecosystems' should promote mention of rural character as a Waitaki landscape.	Seeks that SD-NE-O1 'Natural character. landscapes and features and ecosystems' is amended as follows: Protection, restoration and enhancement of the <u>natural rural</u> character, landscapes, features, ecosystems and water quality of the district, recognising that these areas strongly contribute to Waitaki's unique character, identity, and biodiversity.
232.7	Hampden Community Energy Society	Strategic Direction	SD-NE-O1 Natural character, landscapes and features and ecosystems Protection, restorat	Oppose	Opposes the SD-NE-O1 order in that ecosystems / biodiversity health is the crucial ingredient for life so it needs to be given priority in the objective wording.	Amend SD-NE-O1 as follows: SD-NE-O1 Natural character, landscapes and features <u>Ecosystems health, biodiversity, n</u> Natural character; <u>and</u> landscapes. ...
232.8	Hampden Community Energy Society	Strategic Direction	SD-NE-O1 Natural character, landscapes and features and ecosystems Protection, restorat	Support	Supports SD-NE-O1 'Natural character, landscapes and features and ecosystems'. However, objectives and provisions concerning the Natural Environment need to be given priority in the PDP as all life depends on life-supporting capacity.	Amend SD-NE-O1 'Natural character, landscapes and features and ecosystems' as follows: Protection, restoration and enhancement of the natural character, landscapes, features, <u>the life-supporting capacity of</u> ecosystems and water quality of the district, recognising that these <u>elements areas underpin all social, cultural and economic wellbeing and</u> strongly contribute to Waitaki's unique character, identity, and biodiversity. ...
246.46	Federated Farmers of New Zealand Incorporated	Strategic Direction	SD-NE-O1 Natural character, landscapes and features and ecosystems Protection, restorat	Oppose	Considers SD-NE-O1 overly broad, requiring protection, restoration, and enhancement of all natural character, landscapes, features, ecosystems, and water quality in all circumstances, with no allowance for maintenance or activities that may generate minor adverse effects. The submitter views the requirement to "restore" as inappropriate beyond indigenous biodiversity, adding uncertainty—particularly for subjective values such as natural character—and prefers using only "enhance," or limiting "restoration" solely to indigenous	Seek amendment of SD-NE-O1, to reflect that sustainable management of natural and physical resources is appropriate and provided for within the PDP, and to identify that not all landscapes or features must be protected to such a degree given change should be reasonably anticipated. For example: <u>Maintain</u> , Protection, <u>restoration</u> and enhancement of the natural character, <u>outstanding natural</u> landscapes, <u>outstanding natural</u> features, ecosystems and water quality of the district, <u>while enabling appropriate use of natural and physical</u>

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary
					biodiversity. [see original submission for full reasons]	resources , recognising that these areas strongly contribute to Waitaki's unique character, identity, and biodiversity. OR, with wording with similar intent.
251.43	Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	Strategic Direction	SD-NE-O1 Natural character, landscapes and features and ecosystems Protection, restorat	Oppose	Considers the reference to natural character in SD-NE-O1 is the only strategic direction for water bodies and for the coastal environment outside of Ōamaru harbour and is unclear and needs to be more specific. Considers the objective should be tailored to the Waitaki District and align with national and regional policies; section 6 RMA, national policy statements and the PORPS vision (PORPS IM-O1) for a healthy and resilient natural environment.	Seeks amendments to provide a clear strategic direction, in the Waitaki District context, for each of the values identified and that this is consistent with RMA s. 6, the NPSIB, NZCPS and NPSFM and the PORPS.
253.2	Royal Forest and Bird Protection Society of New Zealand Incorporated	Strategic Direction	SD-NE-O1 Natural character, landscapes and features and ecosystems Protection, restorat	Support	Supports in part so long as the objective is frames as an outcome, including indigenous vegetation and habitat in the list of key biodiversity habitats and the removal of 'these areas' as natural character, indigenous vegetation and habitats, water quality and ecosystems are not confined to areas.	Amend the objective as follows: Protection, restoration and enhancement of Tthe district's natural character, landscapes, features, <u>indigenous vegetation and habitats</u> , ecosystems and water quality of the district are protected, restored and enhanced , recognising that these areas they strongly contribute to Waitaki's unique character, identity, and <u>indigenous</u> biodiversity.
256.5	Fish and Game (Otago and Central South Island Fish and Game Councils)	Strategic Direction	SD-NE-O1 Natural character, landscapes and features and ecosystems Protection, restorat	Amend	The connection between the natural environment and its inherent values—such as food provision and recreational opportunities—is not acknowledged.	Include food gathering and recreation in SD-NE-O1.
259.15	Otago Regional Council	Strategic Direction	SD-NE-O1 Natural character, landscapes and features and ecosystems Protection, restorat	Oppose	Oppose in part. Considers that “identity” is too uncertain and subjective to function as a regulatory objective. The submitter considers that clearer provisions are needed to define identity and measure achievement.	Seeks to amend the objective and/or include additional provisions within the plan that describe the district's identity so the objective is more certain and clearer and the achievement of it can be objectively measured.
294.17	Meridian Energy Limited	Strategic Direction	SD-NE-O1 Natural character, landscapes and features and	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	Seeks to replace the objective as follows: <u>SD-NE-O1 Natural character and outstanding natural features and landscapes</u>

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary
			ecosystems Protection, restorat		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	<u>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.</u> <u>SD-NE-O1A Significant indigenous vegetation and significant habitats of indigenous fauna</u> <u>The Waitaki District's significant indigenous vegetation and significant habitats of indigenous fauna are maintained overall, and where appropriate are protected, restored or enhanced.</u>
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, historic heritage or cultural areas, rather than requiring full protection to better align with the RMA and support appropriate development within the SPZMM.	Seeks to amend as follows: Protection of the natural character, <u>outstanding natural</u> landscapes <u>and</u>-features and <u>significant</u> ecosystems <u>values</u> which strongly contribute to Waitaki's unique character, identity, and indigenous biodiversity <u>from inappropriate subdivision, use, and development.</u>
309.37	Transpower New Zealand Limited	Strategic Direction	SD-NE-O1 Natural character, landscapes and features and ecosystems Protection, restorat	Amend	Opposes the absolute protection of natural character, landscapes, and features and suggests focusing on protecting their values from inappropriate development.	Seeks to amend as follows: Protection of the natural character, <u>outstanding natural</u> landscapes <u>and</u>-features and significant ecosystems <u>values</u> which strongly contribute to Waitaki's unique character, identity, and indigenous biodiversity <u>from inappropriate subdivision, use, and development.</u>
310.25	Graymont (NZ) Limited	Strategic Direction	SD-NE-O1 Natural character, landscapes and features and ecosystems Protection, restorat	Amend	Considers that restoration and enhancement of natural character, landscapes, features, ecosystems, and water quality should only occur where these values have been degraded or lost, not in all cases.	Seeks to amend as follows: Protection <u>and where values have been degraded or lost</u>, restoration and enhancement of the <u>significant</u> natural character, landscapes, features, ecosystems and water quality of the district, recognising that these areas strongly contribute to Waitaki's unique character, identity, and biodiversity.
188.8	Mackenzie District Council	Strategic Direction	SD-NE-O3 Dark Skies The dark sky values at Kakanui, Moeraki, Otematata, Ōmārama, Lake Ō	Support	Supports SD-NE-O3 'Dark Skies'. However, the list of Sensitive environments does not include RSL (whereas the list of Light Sensitive environments does include RSL).	Amend SD-NE-O3 'Dark Skies' and the list of identified places to include specific mention of the Mackenzie Basin / Te Manahuna: 'The dark sky values at Kakanui, Moeraki, Otematata, Ōmārama, Lake Ōhau and Cape Wanbrow as well as <u>within the Mackenzie Basin / Te Manahuna and Waitaki's sensitive</u>

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary
						environments, continue to contribute to the District's identity and character.' Or: Replace the use of the term 'sensitive environments' with 'light sensitive environments.' It is noted that if this relief is chosen, it would be unnecessary to list the township and village names as these are covered by the PDP Definition of 'Light sensitive environments'.
232.10	Hampden Community Energy Society	Strategic Direction	SD-NE-O3 Dark Skies The dark sky values at Kakanui, Moeraki, Otematata, Ōmārama, Lake Ō	Support	No specific reason given.	Seeks that SD-NE-O3 'Dark Skies' are retained as notified.
127.9	Revolution Forest Management Ltd	Strategic Direction	SD-RA-O1 Productive rural environments Rural productive opportunities are enabled in th	Support	Supports the Strategic Direction Objective as it recognises the contribution of the primary production industry to the district	Retain as notified
165.18	Bryry Trust	Strategic Direction	SD-RA-O1 Productive rural environments Rural productive opportunities are enabled in th	Support	Supports the recognition of the important role to primary production to the Waitaki District.	Retain SD-RA-O1 'Productive rural environments' as notified.
166.15	Horticulture New Zealand	Strategic Direction	SD-RA-O1 Productive rural environments Rural productive opportunities are enabled in th	Support	Supports as notified.	Retain as notified.
184.4	Lake Ohau Station Limited	Strategic Direction	SD-RA-O1 Productive rural environments Rural productive	Support	Considers that SD-RA-O1 'Productive rural environments' enabling rural productive activities in the rural environment is supported with the protection of landscape and natural values	Seeks that SD-RA-O1 'Productive rural environments' is retained as notified.

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary
			opportunities are enabled in th		occurring alongside this. It recognises the importance of both protecting the values of ONLs while yet still enabling farming activities which are important for the community's social and economic wellbeing.	
190.16	Alliance Group Limited	Strategic Direction	SD-RA-O1 Productive rural environments Rural productive opportunities are enabled in th	Support	Considers that the objective promotes a strategic outcome for rural areas while also recognising rural industry activities benefits and outcomes.	Retain SD-RA-O1 'Productive rural environments' as notified.
192.12	New Zealand Carbon Farming Group	Strategic Direction	SD-RA-O1 Productive rural environments Rural productive opportunities are enabled in th	Support	Supports SD-RA-O1 'Productive rural environments' as rural productive opportunities need to continue to enable other rural areas to establish and operate rural production activities in recognition of the contribution of Primary production to the district's wellbeing. Forestry activities, including commercial forestry, are important Primary production activities that contribute significantly to the district's economic, environmental, and social outcomes.	Retain the Objective SD-RA-O1 'Productive rural environments' as notified.
195.11	New Zealand Pork Industry Board	Strategic Direction	SD-RA-O1 Productive rural environments Rural productive opportunities are enabled in th	Support	Support objective	Retain as notified
227.6	Janice Wheeler	Strategic Direction	SD-RA-O1 Productive rural environments Rural productive opportunities are enabled in th	Oppose	Considers that: SD-RA-O1 'Productive rural environments' should be amended to delete 'enabled' and add 'encouraged' in the rural environment.	Seeks that SD-RA-O1 'Productive rural environments' is amended as follows: Rural productive opportunities are enabled encouraged 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.
232.17	Hampden Community Energy Society	Strategic Direction	SD-RA-O1 Productive rural environments Rural	Support	Support with amendment as is it considered that bland endorsements of current activities in any sector (see also infrastructure) may appear	Seeks that SD-RA-O1 'Productive rural environments' are amended as follows:

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary
			productive opportunities are enabled in th		desirable to current interests but help no one in the medium and long term given the changing operating conditions.	<u>Sustainable and regenerative r</u> 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.
245.12	Becky Martin	Strategic Direction	SD-RA-O1 Productive rural environments Rural productive opportunities are enabled in th	Support	Supports the recognition of the importance of primary production to the Waitaki District.	Retain
246.43	Federated Farmers of New Zealand Incorporated	Strategic Direction	SD-RA-O1 Productive rural environments Rural productive opportunities are enabled in th	Support	Supports the strategic objective for productive rural environments and seeks amendment to 'primary' production from rural productive	Amendment of SD-RA-O1 as follows: <u>Rural Primary</u> 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.
250.15	Alister and Janine Bremner	Strategic Direction	SD-RA-O1 Productive rural environments Rural productive opportunities are enabled in th	Support	Supports the recognition of the importance of primary production to the district	Retain
252.11	Hollamby Family Trust	Strategic Direction	SD-RA-O1 Productive rural environments Rural productive opportunities are enabled in th	Support	Supports the recognition of the importance of primary production to the Waitaki District.	Retain
253.5	Royal Forest and Bird Protection Society of New Zealand Incorporated	Strategic Direction	SD-RA-O1 Productive rural environments Rural productive opportunities are enabled in th	Oppose	Opposed in part proposing the objective to include the effective management of adverse effects of rural productivity on the environment.	Amend as follows: 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 <u>whilst effectively managing any adverse effects on the environment.</u>

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary
256.17	Fish and Game (Otago and Central South Island Fish and Game Councils)	Strategic Direction	SD-RA-O1 Productive rural environments Rural productive opportunities are enabled in th	Amend	Considers an amendment is needed because managing land use is sometimes essential to protect an area's cultural, social, economic, or ecological values, and considers the current strategic direction is too strong—it risks overriding natural resource protection and needs more balance.	Seeks to amend as follows: “ <u>Where appropriate</u> , rural productive opportunities are enabled...” .,
258.6	Bryce Burnett	Strategic Direction	SD-RA-O1 Productive rural environments Rural productive opportunities are enabled in th	Support	Support the recognition of the importance of primary production to the Waitaki District.	Retain
268.13	Ryan and Hayley Ambler	Strategic Direction	SD-RA-O1 Productive rural environments Rural productive opportunities are enabled in th	Support	Supports the recognition of the importance of primary production to the Waitaki District.	Retain.
272.14	Dave and Karen Ellis	Strategic Direction	SD-RA-O1 Productive rural environments Rural productive opportunities are enabled in th	Support	Supports the recognition of the importance of primary production to the Waitaki District.	Retain.
281.13	Mainland Poultry Limited	Strategic Direction	SD-RA-O1 Productive rural environments Rural productive opportunities are enabled in th	Support	Considers clarification that all forms of primary production are supported in rural environments is needed.	Seeks to amend as follows: Rural productive opportunities are enabled in the rural environment to recognise and sustain the significant contribution of <u>all forms of</u> primary production and rural industry activities to the social, cultural and economic well-being of the district.
287.18	P K M Farms Limited	Strategic Direction	SD-RA-O1 Productive rural environments Rural productive	Support	Supports the recognition of primary production's importance to the Waitaki District	Seeks to retain as notified.

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary
			opportunities are enabled in th			
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.
305.20	Erin Nivonne Schultz	Strategic Direction	SD-RA-O1 Productive rural environments Rural productive opportunities are enabled in th	Support	Considers that it is important that our rural production activities are recognised for the importance of the District and supported in the rural zone.	Retain as notified.
305.22	Erin Nivonne Schultz	Strategic Direction	SD-RA-O1 Productive rural environments Rural productive opportunities are enabled in th	Support	Generally, supports SD-RA-O1 'Productive rural environments'. However, there is a need to recognise that primary production should be prioritised in rural environments in the Waitaki District and not comprised by incompatible activities. It is also important to consider the direct socio-economic effects that development or land use change can have on rural communities. It is imperative that rural areas are resilient for the benefit of the local community and the wider district.	Amend objective as follows: '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 <u>local community</u> and the district.
306.20	Waitaki Property Guardians Incorporated	Strategic Direction	SD-RA-O1 Productive rural environments Rural productive opportunities are enabled in th	Support	Considers that it is important that our rural production activities are recognised for the importance of the District and supported in the rural zone.	Retain as notified.
306.22	Waitaki Property Guardians Incorporated	Strategic Direction	SD-RA-O1 Productive rural environments Rural productive	Support	Support in part. Considers that primary production must be prioritised in rural areas, incompatible activities avoided, and socio-economic effects on rural communities carefully considered to ensure	Amend objective as follows: 'Rural productive opportunities are enabled in the rural environment to recognise and sustain the significant contribution of primary production and rural industry activities

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary
			opportunities are enabled in th		long-term resilience for the local community and wider district.	to the social, cultural and economic well-being of <u>local community</u> and the district.
313.324	Geoff & Jan Keeling - Keeling Dairies Limited	Strategic Direction	SD-RA-O1 Productive rural environments Rural productive opportunities are enabled in th	Support	Supports strategic direction, and understands the importance of protecting and enhancing the historic heritage values, and sites and areas of significance to Maori while also protecting and enhancing the productive use (and change of use) of land which supports the economic and social wellbeing of the Waitaki district in line with SD-RA-01 to SD-RA-03. Considers it important that rural production activities are recognised for their importance in the district and supported in the rural zone, and that primary production activities are prioritised on highly productive land in the district. Also considers it important to consider direct socio-economic effects that development or land use changes can have on rural communities. [Refer to original submission for full reasons]	Retain SD-RA-O1 as notified.
166.16	Horticulture New Zealand	Strategic Direction	SD-RA-O2 Protecting highly productive land Protect highly productive land from inapprop	Support	Supports as notified and considers reference to growing food important.	Retain as notified.
195.12	New Zealand Pork Industry Board	Strategic Direction	SD-RA-O2 Protecting highly productive land Protect highly productive land from inapprop	Support	Support objective	Retain as notified
227.3	Janice Wheeler	Strategic Direction	SD-RA-O2 Protecting highly productive land Protect highly	Oppose	Considers that: SD-RA-O2 'Protecting highly productive land' should amend 'Protect' to read 'develop' in so far as productive soils are concerned for growing food.	SD-RA-O2 'Protecting highly productive land' Protect highly productive land from inappropriate subdivision, use or development, and recognise the need to protect <u>develop</u> productive soils for growing food.

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary
			productive land from inapprop		This will create jobs and support [the] economy.	
232.18	Hampden Community Energy Society	Strategic Direction	SD-RA-O2 Protecting highly productive land Protect highly productive land from inapprop	Support	Supports SD-RA-O2 'Protecting highly productive land' to protect and restore productive soils and prioritise activities with a functional need to be located within Rural Zones.	Seeks that SD-RA-O2 'Protecting highly productive land' is amended as follows: Protect highly productive land from inappropriate subdivision, use or development, and recognise the need to protect <u>and where soils are degraded, restore by regenerative means</u> productive soils for growing food. ...
246.44	Federated Farmers of New Zealand Incorporated	Strategic Direction	SD-RA-O2 Protecting highly productive land Protect highly productive land from inapprop	Support	Support inclusion of this strategic objective, which is generally consistent with the NPS-HPL. However, request the objective be expanded to include recognition of supporting its appropriate productive use for 'land-based primary production' (clause 3.12 of the NPS-HPL). This is not limited to 'growing food' and includes any production from agricultural, pastoral, horticultural, or forestry activities, which is reliant on the soil resource of the land. The NPS-HPL also requires inclusion of provisions manage the potential for reverse sensitivity effects on land-based primary production on highly productive land (clause 3.13).	Amendment of SD-RA-O2 as follows: Protect highly productive land from inappropriate subdivision, use or development, and recognise the need to protect productive soils for growing food <u>prioritise its use for land-based primary production, and ensure potential reverse sensitivity effects are addressed.</u>
281.14	Mainland Poultry Limited	Strategic Direction	SD-RA-O2 Protecting highly productive land Protect highly productive land from inapprop	Oppose	Considers consistency with the NPS-HPL is needed, noting that "protecting productive soils for growing food" is not an objective or policy in the NPSHPL.	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.
294.23	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.

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary
305.21	Erin Nivonne Schultz	Strategic Direction	SD-RA-O2 Protecting highly productive land Protect highly productive land from inapprop	Support	Considers that it is important to recognise primary production activities should be prioritised on highly productive land in the District.	Retain as notified.
306.21	Waitaki Property Guardians Incorporated	Strategic Direction	SD-RA-O2 Protecting highly productive land Protect highly productive land from inapprop	Support	Considers that it is important to recognise primary production activities should be prioritised on highly productive land in the District.	Retain as notified.
310.27	Graymont (NZ) Limited	Strategic Direction	SD-RA-O2 Protecting highly productive land Protect highly productive land from inapprop	Amend	Supports the objective but considers there should be an amendment to allow for existing activities and considers that there should be a review of the HPL overlay on their site.	Seeks to amend as follows: To the greatest extent practicable, pProtect highly productive land from inappropriate subdivision, use or development, and recognise the need to protect productive soils for growing food. Also seeks that the area of Highly Productive land located on its site should be reviewed, taking into account those activities that are already established within that area.
313.325	Geoff & Jan Keeling - Keeling Dairies Limited	Strategic Direction	SD-RA-O2 Protecting highly productive land Protect highly productive land from inapprop	Support	Supports strategic direction, and understands the importance of protecting and enhancing the historic heritage values, and sites and areas of significance to Maori while also protecting and enhancing the productive use (and change of use) of land which supports the economic and social wellbeing of the Waitaki district in line with SD-RA-01 to SD-RA-03. Considers it important that rural production activities are recognised for their importance in the district and supported in the rural zone, and that primary production activities are prioritised on highly productive land in the district. Also considers it important to consider direct socio-economic effects that development or land use changes can have on rural communities. [Refer to original submission for full reasons]	Retain SD-RA-O2 as notified.

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary
127.10	Revolution Forest Management Ltd	Strategic Direction	SD-RA-O3 Rural character and reverse sensitivity Ensure activities in rural areas remai	Support	Support the Strategic Direction Objective as it recognises the importance of primary production to the district	Retain as notified
166.17	Horticulture New Zealand	Strategic Direction	SD-RA-O3 Rural character and reverse sensitivity Ensure activities in rural areas remai	Support	Supports in part and considers strategic direction should connect with Rural Zone objective for rural amenity and character.	Amend as follows: ... Ensure activities in rural areas development remains compatible with rural character <u>and rural amenity</u> and <u>minimise the risk of avoids</u> reverse sensitivity impacts on <u>primary production activities that would compromise primary production or the use of highly productive land.</u>
178.5	Alastair & Sandra Gibson	Strategic Direction	SD-RA-O3 Rural character and reverse sensitivity Ensure activities in rural areas remai	Support	Supports in part: Considers it is also important to consider the direct socio-economic effects that development or land use change can have on rural communities and that rural areas are resilient for the benefit of the local community and wider district.	Seeks to amend the objective to ensure that rural productive opportunities are supported by acknowledging the vital role of primary production and rural industries in enhancing the social, cultural, and economic well-being of the local community and the district.
184.5	Lake Ohau Station Limited	Strategic Direction	SD-RA-O3 Rural character and reverse sensitivity Ensure activities in rural areas remai	Support	Supports SD-RA-O3 'Rural character and reverse sensitivity' as it aligns with the zone being used primarily for primary production including intensive primary production that aligns with the principal policies and methods stated in GRUZ. Rural subdivision and the introduction of sensitive activities into the rural environment can conflict with primary production including intensive primary production activities.	Seeks to retain SD-RA-O3 'Rural character and reverse sensitivity' as notified.
190.17	Alliance Group Limited	Strategic Direction	SD-RA-O3 Rural character and reverse sensitivity Ensure activities in rural areas remai	Support	Supports SD-RA-O3 'Rural character and reverse sensitivity' to ensure activities in rural areas remain compatible with rural character and minimise the potential for rural activities to be impacted by "new incompatible sensitive activities" thus recognising the potential for reverse sensitivity issues to arise.	Retain SD-RA-O3 'Rural character and reverse sensitivity' as notified.

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary
195.13	New Zealand Pork Industry Board	Strategic Direction	SD-RA-O3 Rural character and reverse sensitivity Ensure activities in rural areas remai	Support	Support objective	Retain as notified
196.6	Mark and Jayne Strachan	Strategic Direction	SD-RA-O3 Rural character and reverse sensitivity Ensure activities in rural areas remai	Support	Supports in part: Considers it is also important to consider the direct socio-economic effects that development or land use change can have on rural communities and that rural areas are resilient for the benefit of the local community and wider district.	Seeks to amend the objective to ensure that rural productive opportunities are supported by acknowledging the vital role of primary production and rural industries in enhancing the social, cultural, and economic well-being of the local community and the district.
232.19	Hampden Community Energy Society	Strategic Direction	SD-RA-O3 Rural character and reverse sensitivity Ensure activities in rural areas remai	Support	Supports SD-RA-O3 'Rural character and reverse sensitivity' to provide protection for existing rural activities from the reverse sensitivity effects from intensification or odour sensitive activities in the surrounding environment. [Inferred as specific reasons not given]	Seeks that SD-RA-O3 'Rural character and reverse sensitivity' is retained as notified.
246.45	Federated Farmers of New Zealand Incorporated	Strategic Direction	SD-RA-O3 Rural character and reverse sensitivity Ensure activities in rural areas remai	Support	Supports this objective in principle as it addresses the matter of reverse sensitivity and seeks to allow protects primary production and supporting activities to continue and not be impacted from other activities that do not need to occur in a rural environment (e.g., a retirement village). 'Rural character' is not defined in the RMA or this PDP, but how it will be maintained is described in GRUZ-P2, and 'semi-rural character' is described in RLZ-O2. Restricting various farming activities, because the effects of the potential effects of those farming activities on landscape and amenity values ('rural character'?). Insofar as GRUZ-P2 acknowledges primary production, existing rural activities, and provides for activities reliant on the natural and physical resources of the GRUZ, then we support SD-RA-O3.	Retain SD-RA-O3 as notified in the PDP and seek inclusion of a definition for 'rural character' that acknowledges all activities that have a functional or operational need to locate in the rural zone, are part of rural character.

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary
281.15	Mainland Poultry Limited	Strategic Direction	SD-RA-O3 Rural character and reverse sensitivity Ensure activities in rural areas remai	Oppose	Considers clarification that new activities must minimise the risk of reverse sensitivity on primary production is needed.	Seeks to amend as follows: Ensure activities <u>sought</u> in rural areas remain compatible with rural character and minimise the risk of reverse sensitivity impacts on primary production activities.
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.
310.28	Graymont (NZ) Limited	Strategic Direction	SD-RA-O3 Rural character and reverse sensitivity Ensure activities in rural areas remai	Amend	Considers that the objective be amended to prioritise avoiding reverse sensitivity effects on existing primary production activities.	Seeks to amend as follows: Ensure activities in rural areas remain compatible with rural character, <u>by avoiding in the first instance, and otherwise minimising and minimise</u> the risk of reverse sensitivity impacts on <u>existing, lawfully established</u> primary production activities, <u>protecting their ongoing operation</u> .
313.326	Geoff & Jan Keeling - Keeling Dairies Limited	Strategic Direction	SD-RA-O3 Rural character and reverse sensitivity Ensure activities in rural areas remai	Support	Supports strategic direction, and understands the importance of protecting and enhancing the historic heritage values, and sites and areas of significance to Maori while also protecting and enhancing the productive use (and change of use) of land which supports the economic and social wellbeing of the Waitaki district in line with SD-RA-01 to SD-RA-03. Considers it important that rural production activities are recognised for their importance in the district and supported in the rural zone, and that primary production activities are prioritised on highly productive land in the district. Also considers it important to consider direct socio-economic effects that development or land use changes can have on rural communities. [Refer to original submission for full reasons]	Retain SD-RA-O3 as notified.