

DDPR_feedback_0093s		
	Name	Livi Whyte
	Organisation	Waka Kotahi NZ Transport Agency Christchurch
	Email	Livi.Whyte@nzta.govt.nz
	Response Date	Aug 31 22
	Notes	
Q1	Select the chapter you want to provide feedback on	
Q2	In general, to what extent do you support the contents of this chapter?	
Q3	Objective/Policy/Rule/Standard reference:	
Q4	Feedback/Comments	
Q5	Objective/Policy/Rule/Standard reference:	
Q6	Feedback/Comments	
Q7	Objective/Policy/Rule/Standard reference:	
Q8	Feedback/Comments	
Q9	Objective/Policy/Rule/Standard reference:	
Q10	Feedback/Comments	
Q11	supporting documents?	
	0	
Q12	If you need more space, or have any other general comments, please leave them here	
	<p>Good afternoon, Please find attached Waka Kotahi NZ Transport Agency's feedback on the Draft Waitaki District Plan. Due to the feedback covering several chapters throughout the Draft District Plan the individual provisions have not been entered to the online form. A word document of the submission table has been included in this email to assist with any information the Council may require. If you have any questions or wish to discuss the feedback in further detail, please do not hesitate to contact me. Ngā mihi, Livi Whyte Planner – Environmental Planning (South) Poutiaki Taiao   Environmental Planning Email: Livi.Whyte@nzta.govt.nz Phone: 03 740 3042 Mobile: 021 229 7348 Waka Kotahi NZ Transport Agency Christchurch, Level 1, BNZ Centre, 120 Hereford Street PO Box 1479, Christchurch 8011, New Zealand</p>	

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31 August 2022

Waitaki District Council

Via online submission

## **Feedback on the Draft Waitaki District Plan**

### Section 1: Applicant Details:

To: Waitaki Draft District Plan Team  
20 Thames Street  
Oamaru 9400

From: Waka Kotahi NZ Transport Agency  
PO Box 1479  
Christchurch 8011

Address for Service: Attention: Livi Whyte  
Phone: 021 229 7348  
Email: [livi.whyte@nzta.govt.nz](mailto:livi.whyte@nzta.govt.nz)

### **Introductory Comments:**

The provisions of the Draft Waitaki District Plan have the potential to directly affect the ability of Waka Kotahi to operate, maintain, and improve the road network. This feedback focuses on ensuring that Waka Kotahi roading assets are adequately provided for in the draft provisions, that the approach to the transport issues in the Waitaki District align with the Waka Kotahi strategic direction, and that Waka Kotahi delivers on the mandate from Central Government to promote best practice transport solutions across the country. We thank the Waitaki District Council (WDC) for engaging early with Waka Kotahi on the draft provisions.

### **The Waka Kotahi feedback:**

The Waka Kotahi feedback includes general comments and suggests amendments to the Draft Waitaki District Plan. Feedback on specific provisions is summarised in Table 1 (attached). Some of the key points we have commented on include:

1. While it is acknowledged that some chapters include a preamble on when particular rules in the Draft District Plan apply, in some chapters there are multiple provisions relating to a similar activity, for example earthworks in the Coastal Environment chapter. It would be helpful to plan users to have cross referencing to all other provisions that apply to the same type of activities, including any other rules and standards that should be considered. There are also several occasions where rules relating to the various overlays have rules and standards that address similar matters but do not directly overlap, for example:

INF-S17 and ECO-R2 both provide for indigenous clearance or removal within SCHED-6 – Significant Natural Area, ECO-2 permits the indigenous vegetation clearance is for the repair and maintenance of existing and lawfully established roads, while INF-S17 provides for trimming, pruning or removal of indigenous vegetation and earthworks within an area identified in SCHED-6. It is recommended that rules and standards like this include reference to activity they are permitted under, in this instance INF-S17 should reference that it is relation to activities associated with infrastructure only.

It is recommended this is considered further and any discrepancies clarified to ensure easy and coherent interpretation of the District Plan.

2. Waka Kotahi supports the provision for reverse sensitivity effects to be addressed in the Noise Chapter and acknowledge that the acoustic requirements are detailed and clear in the provisions. However, as noted in Table 1, it is sought that the distances from the State Highway in NOISE-R5 and NOISE-S1 are increased to 50m where the speed limit is less than 70km/hr and 100m where the speed limit exceeds 70km/hr as this aligns with the guidance Waka Kotahi promotes for the state highway network. Waka Kotahi is also preparing a national noise contour dataset, mapping the area of potential reverse sensitivity noise effects along the state highway network on a more refined site-specific scale, which should be available in the coming months. This could provide a variable width overlay in place of the fixed 50m and 100m distances.
3. It is also sought that, in regards to NOISE-R5 and NOISE-S1, that it is made clearer that there are two different acoustic requirements based on the legal speed environment adjoining sensitivity activities. The current wording of those provisions rely on the definition for 'transport corridor', and do not directly address the acoustic requirements. It is recognised that with the digital plan any hyperlinking may make it more apparent. To avoid any confusion, it is sought that those provisions are amended to explicitly address the acoustic requirements rather than relying on plan users identifying those requirements through a definition of 'transport corridor'.
4. The overall direction of the Draft District Plan, to ensure urban development is consolidated and adequately supported by current and planned infrastructure, is supported by Waka Kotahi. This comes through in several chapter of the Plan, as well as consideration of future subdivision, use and development in relation to traffic safety and promoting active transport.
5. Overall, Waka Kotahi is supportive of the direction of the Draft District Plan and the provisions that seek to provide and protect Infrastructure within the Waitaki District.

Waka Kotahi would appreciate the opportunity to meet and discuss our feedback with Council. Waka Kotahi would also like an opportunity to discuss the designations with Council prior to the formal notification of the Proposed District Plan.

Signature of person authorised to sign on behalf of the Agency:



Helen Dempster, Senior Planner, Environmental Planning/Poutiaki Taiao

Address for Service:

Waka Kotahi NZ Transport Agency  
PO Box 1479  
Christchurch 8011  
Attention: Livi Whyte  
Phone: (03) 964 2800  
Email: [livi.whyte@nzta.govt.nz](mailto:livi.whyte@nzta.govt.nz)

**Table 1: Waka Kotahi Feedback on the Draft Waitaki District Plan**

Item	Proposed Plan Amendment Section	Support/Support in Part/Oppose/Oppose in Part	Comments/Reasons	Relief Sought
<b>General Approach</b>				
<b>Guidance notes</b>	Infrastructure	Support	Waka Kotahi supports the intent that Infrastructure activities are only subject to the objectives, policies, rules and standards in the Infrastructure Chapter and Strategic Direction objectives, unless the activity is a renewable energy activity in the Energy Chapter; or the activity is associated with the Waitaki Power Scheme addressed in the Waitaki Power Scheme Chapter; or a rule specifically states otherwise.	Retain as proposed.
<b>Cross Boundary Matters</b>				
<b>Cross boundary matters</b>		Neutral	Waka Kotahi acknowledges the value in addressing cross-boundary issues that may arise from adjoining territorial authorities, which include roading and transport matters, drainage systems, water catchments and utility services.	Retain as proposed.
<b>Interpretation - Definitions</b>				
<b>Definitions</b>		Support in part	It appears that the current definitions within the Draft District Plan vary throughout the different chapters. In some instances, there is repetition of meanings, which have been noted below. It is recommended these definitions are consolidated to ensure clear and easy interpretation of the District Plan.	Consolidate definitions to avoid confusion.
	Access	Support in part	The definition is largely supported as described. Waka Kotahi seeks clarification on the meaning of the terms included within the definition, if changes are made to those as a result of the submissions on the Draft Plan, this definition may also require clarification.	Provide clarification of terms within the definition.
	Access lot	Neutral	The use of 'access lot' only appears in relation to 'vehicle access lot' which has been defined separately. The definition is largely the same as the meaning of 'access area'.	Provide clarification for the duplicated terms.
	Active transport network	Support	The definition is supported as described.	Retain as proposed.
	Carriageway	Support	The definition is supported as described.	Retain as proposed.
	Critical facilities	Neutral	This definition largely crosses over with 'regionally significant infrastructure' and appears to be used interchangeably within the District Plan.	Consider if there is an opportunity to consolidate the definitions so that only one is used in the Plan.

			Nonetheless, Waka Kotahi supports strategic road and rail networks (defined in the Canterbury Regional Land Transport Strategy) being included as a critical facility.	
	Essential structures	Support	The definition is supported as described.	Retain as proposed.
	Glare	Support	The definition is supported as described.	Retain as proposed.
	Hard protection structure	Support in part	Waka Kotahi largely supports the meaning of hard protection structure, but seeks an amendment to provide for structures beyond those for the purpose of preventing erosion or flooding beyond the foreshore of the coast, and the edges of lakes or rivers. Waka Kotahi uses hard protection structures to protect the carriageway for other risks, for example rock fall mesh and catch fences, retaining walls, portals and rock rip rap. On that basis, Waka Kotahi seeks the definition to be amended to provide for 'natural hazard risk mitigation' rather than erosion and flooding.	Amend the definition to provide for natural hazard mitigation rather than explicitly erosion and flooding.
	Transport corridor	Support in part	Waka Kotahi seeks amendments to the definition of 'transport corridor' as the 80m specified distance is used in relation to NOISE-R5 and NOISE-S1, which amendments have also been sought on. Further detail is included in our feedback on those provisions within the Noise chapter.  It is sought that definition is updated to include a distance of 100m rather than 80m.	Waka Kotahi seeks for the definition to be amended as follows:  Means the area located within 80m <del>80m</del> of the boundary of any State Highway or railway designation but excludes any land where the speed limit applying to the State Highway is less than 70km/hour.  To:  Means the area located within <b>100m</b> of the boundary of any State Highway or railway designation but excludes any land where the speed limit applying to the State

				Highway is less than 70km/hr <del>hour</del> .
<b>SD - Strategic Direction</b>				
<b>SD-NE – Strategic objectives – Natural environment</b>				
<b>Natural environment</b>	SD-NE-O3	Neutral	The strategic objectives relate to dark sky values, however there are no specific objectives and policies or rules within the Draft District Plan that apply.	
<b>SD-RREE– Strategic objectives – Risk, resilience, and energy efficiency</b>				
<b>Risk, resilience and energy efficiency Objectives</b>	SD-RREE-O1	Support	Waka Kotahi supports the intent of the objective to improve the District's resilience to natural hazards, with particular reference to climate change. The objective is supported, because it notes 'where possible' risks of natural hazards to people, communities, property and infrastructure should be avoided or mitigated.	Retain as proposed.
	SD-RREE-O2	Support	This objective is supported because it seeks to ensure the effects of climate change are recognised and an integrated management approach is adopted. The methods are also supported in relation to natural hazard management, adaption to climate change and efficient urban form and settlement and development patterns.	Retain as proposed.
	SD-RREE-O4	Support	Waka Kotahi supports reducing the reliance on non-renewable sources of energy and the encouragement to increase the use of renewable sources and greater energy conservation.	Retain as proposed.
<b>SD-RA – Strategic objectives – Rural areas</b>				
<b>Rural areas Objectives</b>	SD-RA-O3	Support in part	The objective is supported as proposed.	Retain as proposed.
<b>SD-UFD – Strategic objectives – Urban form and development</b>				
<b>Urban form and development</b>	SD-UFD-O1	Support	The intent of this objective is supported, which seeks to ensure urban form comprises of good quality design and integration with infrastructure.	Retain as proposed.
	SD-UFD-O2	Support	Waka Kotahi also supports this objective, which provides for higher density housing is in locations where there is access to the transport network and multi-modal transport options.	Retain as proposed.
	SD-UFD-O3	Support	Waka Kotahi supports this objective, which seeks to ensure compatible activities with similar effects and functions are located together in appropriate areas to manage efficient use of land, resources and infrastructure, and minimise adverse effects from incompatible activities.	Retain as proposed.

	SD-UFD-O4	Support	This objective is supported as it seeks to provide for urban environments that are liveable, connected, accessible, safe and well-designed for the community to live, work and play.	Retain as proposed.
	SD-UFD-O5	Support	Waka Kotahi supports this objective, which seeks to enable Waitaki to grow in a manner that is cohesive, compact and structure, while ensuring sufficient supply of land for housing, commercial, industrial and recreational needs.	Retain as proposed.
	SD-UFO-O6	Support	Waka Kotahi supports this objective, which seeks to ensure future urban growth is appropriately located and serviced with relevant infrastructure.	Retain as proposed.
<b>INF – Infrastructure</b>				
<b>Overview</b>	Chapter overview	Support	Waka Kotahi supports the overview of this chapter as it recognises the critical role infrastructure plays to the social and economic well-being of people and communities. It also acknowledges that while infrastructure can have adverse effects on surrounding lands uses and the environment, it is also necessary to protect essential infrastructure and particularly from activities that are incompatible and may be subject to reverse sensitivity.	Retain as proposed.
<b>Infrastructure Objectives</b>	INF-O1	Support	Waka Kotahi supports this objective in that it provides for effective, resilient, efficient and safe infrastructure and has particular reference to local, regional and national connectivity. The objective also seeks to ensure subdivision and development, infrastructure and other activities are integrated.	Retain as proposed.
	INF-O2	Support	The objective is supported, as it also seeks to ensure safe, efficient and resilient infrastructure is available to meet the needs of existing and planned subdivision, use and development.	Retain as proposed.
	INF-O3	Support	The objective is supported by Waka Kotahi as it recognises that infrastructure provides benefits to people and communities, and seeks to ensure it is established, operated, maintained, repaired, upgraded efficiently, securely and sustainably. The objective also seeks to ensure all of these activities above are undertaken while adverse effects of infrastructure are avoided, remedied and mitigated.	Retain as proposed.
	INF-O4	Support	Waka Kotahi also support this objective as it provides for the national, regional and local benefits of regionally significant infrastructure, and seeks to ensure it is recognised and provided for, and that the functions and operations are	Retain as proposed.

			protected from adverse effects, with particular reference to reverse sensitivity of other activities.	
	INF-O5	Support in part	Waka Kotahi generally supports the objective as it seeks to ensure the transport network is effective, accessible and integrated with other land uses, however clarification is sought for 'contributing to the amenity of public spaces'.	Amend/Provide clarity on the intent for the transport network to contribute to the amenity of public spaces.
<b>Infrastructure Policies</b>	INF-P1	Support	The policy is supported on the basis it recognises and provides for social, economic, cultural and economic well-being benefits of regionally significant infrastructure, which includes the integrated, efficient and safe transport network with specific reference to the State Highways, that allow movement of people and goods.	Retain as proposed.
	INF-P3	Support in part	Waka Kotahi supports the policy to enable infrastructure to be provided in a manner that is safe, efficient, integrated, accessible and available at sufficient capacity for existing and planned subdivision, use and development.	Retain as proposed.
	INF-P4	Support in part	Waka Kotahi supports the policy to enable new infrastructure and the operation, maintenance, repair, upgrading and removal of existing infrastructure, however, further clarification is sought for (3.). Clarity is required on an 'adverse impact' in relation to maintenance and repair or removal of existing infrastructure in any overlay. The proposed threshold also seems to be harsher on existing infrastructure ('...does not adversely impact...') than on new infrastructure ('...minimises adverse effects...').	Provide clarity on the threshold for 'adverse impact'.
	INF-P5	Support	The policy is supported as it seeks to protect the safe and efficient operation, maintenance, repair, upgrading, removal and development of regionally significant infrastructure from being unreasonably compromised. In particular, the policy requires sensitive activities be located and designed so that potential adverse effects of and on the rail corridor and State Highway are avoided, remedied or mitigated and that the effects of subdivision of a site that is adjacent to regionally significant infrastructure are appropriately managed.	Retain as proposed.
	INF-P8	Support	The policy is supported as it contains the matters to be considered for other infrastructure not defined as regionally significant outside of overlays.	Retain as proposed.
	INF-P9	Support	Waka Kotahi supports the policy which recognises the operational and function needs of regionally significant infrastructure and other infrastructure. The matters contained	Retain as proposed.

			in policy are supported for decision-making on new infrastructure and the operation, maintenance and upgrading of existing infrastructure.	
	INF-P10	Support	The policy is supported which seeks to recognise the possibility of new technology in infrastructure.	Retain as proposed.
	INF-P12	Support	The policy is supported to as it seeks to enable the safe, resilient, effective and efficient operation and maintenance of the transport network to meet the local, regional and national transport needs.	Retain as proposed.
	INF-P13	Support	Waka Kotahi supports the policy, which provides for the upgrading or development of the transport network. The inclusion of the wording 'where practicable' is also supported in relation to the matters to be considered.	Retain as proposed.
	INF-P14	Support	Waka Kotahi supports the policy, which include the reference to the National Code of Practice for Utility Operators' Access to Transport Corridors 2018.	Retain as proposed.
	INF-P15	Support in part	Waka Kotahi largely supports the policy, however, it is sought that the reference to the New Zealand Transport Agency's One Network Road Classification is amended to the One Network Framework.	Amend to include reference to the One Network Framework.
	INF-P16	Support in part	Waka Kotahi supports (1.) of the policy, which allows for upgrades to existing and new infrastructure on heritage items or within heritage settings where it can be demonstrated there is an operational or functional need that means the infrastructure's location cannot be avoided. However, as the policy requires both (1.) and (2.) to be considered, Waka Kotahi seeks the amendment to (2.) to require upgrades to existing and new infrastructure on heritage items or within their settings to protect and maintain the heritage and/or cultural values 'where practicable'.	Amend the policy to include 'where practicable' in (2.).
	INF-P17	Support in part	Waka Kotahi supports (1.) of the policy, which enables trimming, pruning and activities within the root protection area of a tree in SCHED4 for the purpose of operating, maintain, upgrading and removing existing infrastructure and new infrastructure where it can be demonstrated there is an operational or functional need that means the infrastructure's location cannot be avoided. However, as the policy requires both (1.) and (2.) to be considered, Waka Kotahi seeks an amendment to (2.) to provide for new and existing	Amend the policy to include 'where practicable' in (2.).

			infrastructure that will not compromise the long-term health, natural life or values of the Notable Tree 'where practicable'.	
	INF-P18	Support	The policy is supported because it seeks to enable the removal of a tree identified in SCHED4 for existing and new infrastructure where it can be demonstrated there is an operation and functional need that the infrastructure's location cannot be avoided and there are no feasible alternatives.	Retain as proposed.
	INF-P19	Support in part	The policy is largely supported because while it avoids new infrastructure and upgrades to existing infrastructure in the Coastal Environment, it provides for the infrastructure if it is not practicable to avoid locating it there for a functional need, however Waka Kotahi seeks the policy to be amended to provide for 'operational need' as well.	Amend the policy to provide for operational or functional need to establish infrastructure in the Coastal Environment.
	INF-P20	Support in part	The intent of the policy is supported because while it avoids new infrastructure and upgrades to existing infrastructure on or within Outstanding Natural Features and Landscapes, Significant Natural Areas and beyond the Coastal Environment, it provides for the infrastructure if it is not practicable to avoid locating it there for a functional need, however Waka Kotahi seeks the policy to be amended to provide for 'operational need' as well.	Amend the policy to provide for operational or functional need to establish infrastructure where it is on or within Outstanding Natural Features and Landscapes, Significant Natural Areas and beyond the Coastal Environment.
	INF-P21	Support	The policy is supported as proposed.	Retain as proposed.
	INF-P22	Support	The policy is supported as proposed.	Retain as proposed.
	INF-P25	Support	Waka Kotahi supports the policy which provides for signs associated with the construction, operation, maintenance and repair or upgrading of infrastructure.	Retain as proposed.
<b>Infrastructure Rules</b>	INF-R1	Support in part	Waka Kotahi supports the intent of the rule, which provides for the operation, maintenance and removal of existing infrastructure outside of an overlay. However, clarification is sought around the provision for compliance with the noise standard. It is noted that construction noise is permitted under NOISE-R10 and vehicle noise is exempt under NOISE-E1 and therefore it is assumed that PER-1 would relate to the on-going noise of an activity.	Provide clarification on provision PER-1 in relation to compliance with the noise standard for the zone.
	INF-R2	Support in part	Waka Kotahi supports the intent of the rule, which provides for the maintenance and repair and removal of existing infrastructure within an overlay. However, clarification is sought	Provide clarification on provision PER-1 in relation to compliance

			around the provision for compliance with the noise standard. It is noted that construction noise is permitted under NOISE-R10 and vehicle noise is exempt under NOISE-E1 and therefore it is assumed that PER-1 would relate to the on-going noise of an activity.	with the noise standard for the zone.
	INF-R3	Support in part	Waka Kotahi supports the intent of the rule, which provides for upgrading of infrastructure outside an overlay. However, clarification is sought around the provision for compliance with the noise standard. It is noted that construction noise is permitted under NOISE-R10 and vehicle noise is exempt under NOISE-E1 and therefore it is assumed that PER-1 would relate to the on-going noise of an activity.	Provide clarification on provision PER-1 in relation to compliance with the noise standard for the zone.
	INF-R5	Support in part	Waka Kotahi supports the intent of the rule, which provides for upgrading of infrastructure outside an overlay. However, clarification is sought around the provision for compliance with the noise standard. It is noted that construction noise is permitted under NOISE-R10 and vehicle noise is exempt under NOISE-E1 and therefore it is assumed that PER-3 would relate to the on-going noise of an activity.	Provide clarification on provision PER-3 in relation to compliance with the noise standard for the zone.
	INF-R6	Support in part	Waka Kotahi supports the intent of the rule, which provides for upgrading of infrastructure outside an overlay. However, clarification is sought around the provision for compliance with the noise standard. It is noted that construction noise is permitted under NOISE-R10 and vehicle noise is exempt under NOISE-E1 and therefore it is assumed that PER-1 would relate to the on-going noise of an activity.	Provide clarification on provision PER-1 in relation to compliance with the noise standard for the zone.
	INF-R10	Support in part	The rule is supported which provides for the establishment of cabinets and electric vehicle charge stations located outside any overlay. Again, it is queried if compliance with the noise standard relates to on-going noise of an activity as construction noise is permitted (NOISE-R10) and vehicle noise is exempt (NOISE-E1) in the Noise Chapter.	Provide clarification on provision PER-1 in relation to compliance with the noise standard for the zone.
	INF-R12	Support	Waka Kotahi supports the permitted standard for infrastructure located on or within existing bridges and structures across streams. Again, it is queried if compliance with the noise standard relates to on-going noise of an activity as construction noise is permitted (NOISE-R10) and vehicle noise is exempt (NOISE-E1) in the Noise Chapter.	Provide clarification on provision PER-1 in relation to compliance with the noise standard for the zone.

	INF-R22	Support	The rule is supported as proposed.	Retain as proposed.
	INF-R25	Support	The rule is supported as proposed as it provides for new roads and upgrading of roads outside any overlay as a controlled activity.	Retain as proposed.
	INF-R26	Support	The rule is supported as it provides for upgrading of roads within a natural hazard overlay or coastal natural hazard overlay.	Retain as proposed
	INF-R27	Support	The rule is supported as it provides for upgrading of roads within a Rural Scenic Landscape Overlay.	Retain as proposed
	INF-R31	Support	The rule is supported as it provides a consenting pathway for upgrading roads located in a Significant Natural Area	Retain as proposed
	INF-R32	Support	The rule is supported as it provides a consenting pathway for upgrading infrastructure located in a Significant Natural Area	Retain as proposed
	INF-R33	Support	The rule is supported as it provides a consenting pathway for upgrading existing infrastructure and new infrastructure to be located within the root protection zone of a Notable Tree.	Retain as proposed
	INF-R36	Support	The rule is supported as it provides a consenting pathway for coastal flood, erosion and river flood protection works	Retain as proposed
	INF-R38	Support	The rule is supported as it provides a consenting pathway for infrastructure in a Significant Natural Area	Retain as proposed
	INF-R39	Support	The rule is supported as it provides a consenting pathway for upgrades to infrastructure and new infrastructure to be located in areas identified as Outstanding Natural Features, Outstanding Natural Landscapes, Historic Heritage Items and Sites of Significance to Māori or the Oamaru Historic Area	Retain as proposed
<b>Infrastructure Standards</b>	INF-S1	Neutral	Waka Kotahi recommends defining 'other infrastructure' in (12.) in relation to upgrading. With the exception of (12) all of the other points appear to be particular to telecommunications infrastructure. If this standard is intended to be specific to telecommunications infrastructure only, we suggest that the title of the policy reflect this.	Provide clarity on 'other infrastructure'.
	INF-S10	Support	The standard for setbacks from a riparian and coastal margin is supported as a matter of discretion provides for the operational or functional needs of infrastructure when the standard is breached.	Retain as proposed.
	INF-S13	Support	The standard for earthworks is supported as a matter of discretion provides for the operational or functional needs of infrastructure when the standard is breach.	Retain as proposed.

	INF-S16	Support	The standard for earthworks in relation to Outstanding Natural Features and Landscapes and Rural Scenic Landscape Overlays is supported as a matter of discretion provides for the operational or functional needs of infrastructure when the standard is breached.	Retain as proposed
	INF-S17	Support	The standard for trimming, pruning or removal of indigenous vegetation and earthworks in an area identified in SCHED6 – Significant Natural Areas is supported as a matter of discretion provides for the operational or functional needs of infrastructure when the standard is breached.	Retain as proposed.
	INF-S18	Support	The standard for trimming, pruning or removal of indigenous vegetation and earthworks outside of an area identified in SCHED6 – Significant Natural Areas is supported as a matter of discretion provides for the operational or functional needs of infrastructure when the standard is breached.	Retain as proposed
	INF-S20	Support in part	Waka Kotahi largely supports the policy, however, it is sought that the reference to the New Zealand Transport Agency's One Network Road Classification is amended to the One Network Framework.	Amend to include reference to the One Network Framework.
	INF-S21		This standard manages the design of roads and specifies in (3) that 'roads', which by definition includes state highways, must be designed in accordance with INF-APP1. INF-APP1 is not provided in the draft District Plan; rather a 'placeholder' indicates that this appendix is under development. Waka Kotahi, as the road controlling authority for the state highway network, have an interest in this standard.	
<b>STORM - Stormwater</b>				
<b>Overview</b>	Overview	Neutral	Waka Kotahi considers the chapter crosses into the realm of the Otago and Canterbury Regional Councils, but acknowledges that this is largely driven by the NPS requirements. This could create overly onerous consenting requirements for applicants if consents are triggered for the same activity under both the District and Regional Plans.	
<b>Stormwater Objectives</b>	STORM-O1	Support	This objective is supported, as it seeks to ensure that there is no increased flooding risk or peak demand on stormwater management as a result of subdivision and development in urban zones.	Retain as proposed.

<b>Stormwater Policies</b>	STORM-P1	Support	Waka Kotahi supports the policy in that (1.) acknowledges that there may be site specific constraints or opportunities that mean that hydraulic neutrality is not required. It is also supported that the policy explicitly notes that hydraulic neutrality within new subdivision and development is required where practicable. The provision for no increased risk in downstream flooding is also supported.	Retain as proposed.
	STORM-P2	Support	This policy is supported as it requires efficient and sustainable stormwater control and disposal systems and seeks to minimise the effects of development to avoid inundation within subdivisions and development or on adjoining land. Waka Kotahi supports this as stormwater should be managed to avoid flooding and ponding effects on the State Highway, however it is noted that is not always possible to manage stormwater 'on-site' particularly within the road reserve.	Retain as proposed.
<b>Stormwater Rules</b>	STORM-R2	Support in part	Waka Kotahi seeks further consideration given to when new impervious surfaces are required but a hydraulic neutrality device cannot be provided. The designation and road corridor will not always be able to accommodate this for activities such as shared pathways and passing lanes.	Further consideration of when a hydraulic neutrality device cannot be accommodated.
<b>Stormwater Standards</b>	STORM-S2	Support in part	Waka Kotahi seeks further consideration to instances where the land area is unavailable to support a hydraulic neutrality device, such as in a narrow road corridor.	Further consideration when a hydraulic neutrality cannot be accommodated.
<b>TRAN - Transport Overview</b>	Overview	Support.	The overview of the Transport Chapter is supported as the foreword clearly indicates that the use, repair, operation and maintenance of the transport network by the transport operators (which includes Waka Kotahi NZ Transport Agency) is managed by the Infrastructure Chapter. Waka Kotahi also supports the note within the foreword that requires all new roads and vehicle access points that intersect a State Highway require the approval of the Agency. This will make it clear to users of the District Plan that approval is required.	Retain as proposed.
<b>Transport Objectives</b>	TRAN-O1	Support	The objective is supported which seeks to ensure use and development has safe and effective transport facilities provided on-site, and site access. Waka Kotahi supports that these activities are undertaken without compromising the safety and efficiency of the transport network.	Retain as proposed.

	TRAN-O2	Support	Waka Kotahi supports the intent of the objective to ensure the safety and efficiency of the transport network is not compromised by inappropriate use and development that generates high numbers of vehicle trips.	Retain as proposed.
<b>Transport Policies</b>	TRAN-P1	Support	The policy is supported as it seeks to provide for high vehicle trip generator activities where it can be demonstrated that any adverse effect on the transport network will be minimised. Waka Kotahi supports that the policy has regard to the transport network, including proposed or planned infrastructure and the capacity, form and function of the transport network. It is noted that there is grammatical error in P1 as it currently reads 'a ny' rather than 'any'.	Amend to fix grammatical error – update 'a ny' to 'any'.
	TRAN-P2	Support	Waka Kotahi supports the requirement that on-site transport facilities meet industry standards and that the policy seeks ensure the safe and efficient functioning of the transport system.	Retain as proposed.
	TRAN-P3	Support	Waka Kotahi supports that policy, which stipulates that on-site transport facilities that do not meet industry standards should only be allowed where it can be demonstrated they align with the various matters described, including not compromising the safe, efficient and effective functioning of the transport network, in particular the State Highway or rail networks.	Retain as proposed.
	TRAN-P4	Support	The intent of the policy is supported to provide for safe and efficient connections between the transport network and on-site transport facilities.	Retain as proposed.
	TRAN-P5	Support	The policy is supported which seeks to encourage activities that incorporate opportunities for multi-modal and active transport, including cycle parking and end of trip facilities.	Retain as proposed.
<b>Transport Rules</b>	TRAN-R1	Support	Waka Kotahi supports this rule which permits vehicle crossings onto roads where prescribed standards can be complied with.	Retain as proposed.
	TRAN-R3	Support	The rule is supported, which requires vehicle accesses to comply with the standards where access is provided to, and within, the site for movement of vehicles from the legal road.	Retain as proposed.
	TRAN-R4	Support	Waka Kotahi supports that compliance is required with the relevant standards for activities with on-site parking or loading spaces where vehicle access is provided to the site from a legal road.	Retain as proposed.
<b>Transport Standards</b>	TRAN-S3	Support	Waka Kotahi supports the minimum legal widths and formation requirements for private ways/vehicle access lots.	Retain as proposed.

	TRAN-S4	Support in part	Waka Kotahi generally support the provision in (1.c.) that requires any non-residential activity with access to State Highways 1, 8 or 83 to have on-site manoeuvring so no vehicle is required to reverse either onto or off a site. However, Waka Kotahi do not support the provision to allow vehicles to reverse on to the State Highways within the Town Centre Zone; it is sought that the rule is amended to require sufficient manoeuvring space within the site to allow vehicles to exit a site in a forward motion on to the state highways, for all activity types. For clarity, it is also sought that this includes any residential activity that has access to the state highways.	Amend to remove 'except for where located in the Town Centre Zone.'
	TRAN-S5	Support in part	The standard is supported for vehicle manoeuvring areas that are sufficient for vehicles to stand, queue and make all necessary manoeuvres on site without using the road, and without using the area provided for parking, servicing, loading or storage purposes and to allow vehicles to enter and exit the site in a forward direction. Waka Kotahi seeks for the standard to be amended to provide for the requirements to apply to all sites where access is obtained to a State Highway.	Amend the rule to require compliance when access is obtained to a state highway.
	TRAN-S6	Support	Waka Kotahi supports that the site access and manoeuvring for service stations and truck stops must be designed, constructed and maintained in accordance with NZTA RTS 13 Guidelines for Service Stations (March 1996).	
	TRAN-S9	Support	Waka Kotahi supports the requirements for accessible parking spaces.	Retain as proposed.
	TRAN-S10	Support	Waka Kotahi supports the requirements for parking spaces in accordance with AS/NZS 2890.1:2004.	Retain as proposed.
	TRAN-S13	Support	Waka Kotahi supports the standard, which includes the requirements for width and vehicle crossings onto roads, it is also supported that there is a note making it clear that all new vehicle crossings that intersect a State Highway require the approval of Waka Kotahi New Zealand Transport Agency.	Retain as proposed.
	TRAN-S14	Support in part	Waka Kotahi supports the standard as it requires all vehicle crossings on the State Highway to be formed and surfaced in accordance with Appendix 5B – Accessway standards and Guidelines of the NZTA Planning Policy Manual version 1 August 2007, however, to provide for future updates it is sought that the standard is amended to provide for 'guidance from Waka Kotahi NZ Transport Agency'.	Amend the standard (4.) to require all surface of vehicle crossings to be formed and surfaced in accordance with Waka Kotahi New Zealand Transport Guidelines.

	TRAN-S16	Support in part	<p>Waka Kotahi supports the provision of a rule for sight distances from vehicle crossings, however it requested that the minimum distances on to a state highway are included and reflect the guidance contained in the Waka Kotahi NZ Transport Agency Planning Policy Manual (PPM) as follows:</p> <table><tr><th>Legal speed limit (km/hr)</th><th>Minimum sight distance (m) (approach sight distance)</th></tr><tr><td>50</td><td>113</td></tr><tr><td>60</td><td>140</td></tr><tr><td>70</td><td>170</td></tr><tr><td>80</td><td>203</td></tr><tr><td>90</td><td>240</td></tr><tr><td>100</td><td>282</td></tr></table>	Legal speed limit (km/hr)	Minimum sight distance (m) (approach sight distance)	50	113	60	140	70	170	80	203	90	240	100	282	Amend to include provisions for sight distances to the state highways to reflect the Waka Kotahi PPM.
Legal speed limit (km/hr)	Minimum sight distance (m) (approach sight distance)																	
50	113																	
60	140																	
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80	203																	
90	240																	
100	282																	
CL – Contaminated Land																		
Contaminated Land Objectives	CL-O1	Neutral	Waka Kotahi seeks clarification as the wording of the objective is contradictory in that while it seeks to minimise the risks to human health from contaminated it land, it also includes ‘unacceptable exposure’, which implies that the activity should be avoided.	Provide clarity of the intent of the objective.														
NH – Natural Hazards																		
Natural Hazards Policies	NH-P2	Support	Waka Kotahi supports the policy in that it requires likely effects of climate change to be considered when assessing risk from natural hazards.	Retain as proposed.														
	NH-P4	Support	The policy is supported in that it provides for critical facilities where it can be demonstrated that it is not practicable to locate outside of the area, and there are operational needs, and the design and function are resilient to natural hazard risk.	Retain as proposed.														
	NH-P9	Support	Waka Kotahi notes that a short section of State Highway 1, measuring less than 200 metres in length, is shown to be included in the Very Low Risk mapped area of the Moeraki Land Instability Overlay. This policy provides for use and development within the Very Low Risk mapped area where a geotechnical assessment can demonstrate that the risk is acceptable.	Retained as proposed														
Natural Hazards Rules	NH-R5	Support in part	Waka Kotahi supports this policy as it seeks to permit only minor scale earthworks in areas identified as being within a Flood Assessment Overlay, and requires consent for larger scale earthworks that, unless appropriately managed, could	Amend ‘PER-2’ to include Waka Kotahi.														

			create or exacerbate flooding issues. However, Waka Kotahi would also seek to be included to the authorities identified in 'PER-2', so that we are also able to undertake earthworks for the maintenance and repair of flood and erosion protection.	
<b>HH – Historic Heritage</b>				
<b>Historic Heritage Objective</b>	HH-O1	Support in part	Waka Kotahi generally supports the objective to maintain and protect heritage of the District to be retained, however clarification is sought on the weight of the objective against the others in the Historic Heritage chapter.	Provide clarification on the weight of the objectives within the Historic Heritage Chapter.
	HH-O2	Support in part	Waka Kotahi generally supports the intent of the objective to provide for adaptive reuse of Historic Heritage Items, however clarification is sought on the weighting of the objectives within the chapter and when it is appropriate to adaptively re-use and retain historic heritage rather than protect it.	Provide clarification on the weight of the objectives within the Historic Heritage Chapter.
	HH-O3	Support in part	Waka Kotahi generally supports the objective that seeks to ensure that heritage values of Historic Heritage Items are enhanced or restored 'where possible'. Again, clarification is sought on the weighting of the provisions.	Provide clarification on the weight of the objectives within the Historic Heritage Chapter.
<b>Historic Heritage Policies</b>	HH-P3	Support	The policy is supported to recognise the social, cultural and economic benefits of the ongoing protection and use, including re-use of Historic Heritage Items and their settings.	Retain as proposed.
	HH-PP5	Support in part	Waka Kotahi largely supports the policy which seeks to enable attachments to Historic Heritage Items where they provide for modern services and support the enduring use, adaptive re-use and retention of the Historic Heritage Item, and they are sympathetically integrated. The provision in (3.) is sought to be amended to include 'unless there is a functional or operational need'.	Amend the wording of (3.) to read as follows:  3. any attachment is not visible from any adjoining public place and, if on a roof, is aligned with the plane of the roof, <i>unless there is an operational need and functional need.</i>
	HH-P12	Support	The policy is supported as it seeks to allow buildings and structures within the setting of a Historic Heritage Item is maintained, but has regard to the extent to which any services and utilities are located, designed, or screened to be as unobtrusive as practicable.	Retain as proposed.

<b>Historic Heritage Rules</b>	HH-R3	Support in part	Waka Kotahi seeks the inclusion of roads as a permitted activity for earthworks that are undertaken for the repair and maintenance of lawfully established activities. This will be consistent with similar rules within the District Plan.	Amend to include provision for lawfully established roads.
<b>TREE – Notable Trees</b>				
<b>Notable Trees Policies</b>	TREE-P3	Support	Waka Kotahi supports the allowance to trim Notable Trees and maintenance within the root protection area, and that it is noted that adverse effects should be remedied or mitigated where it is not practicable to avoid.	Retain as proposed.
	TREE-P4	Support in part	The general intent of the policy is supported, however further clarification is sought on whether the works are provided for if there is an operational or functional need to undertake activities within the root protection area of Notable Trees.	Provide clarification.
	TREE-P5	Support in part	Waka Kotahi generally supports the intent of the policy, however further clarification is sought on whether the works are provided for if there is an operational or functional need to other trimming and pruning of Notable Trees.	Provide clarification.
	TREE-P6	Support	The policy is supported as it acknowledges that sometimes the removal or destruction of a Notable Tree cannot be avoided where there are no feasible alternative options for retaining the tree.	Retain as proposed.
<b>Notable Trees Rules</b>	TREE-R2	Support in part	The rule is generally supported as it provides for trimming or pruning of a Notable Tree where the works are necessary to prevent significant threat to people or property. It is sought to amend the rule to include a matter of discretion relating to the operational and functional need of trimming or pruning of a Notable Tree.	Consideration of operational need and functional need as a matter of discretion.
	TREE-R3	Support	Waka Kotahi supports the rule for the removal of Notable Trees where the works for removal of a tree that is certified by a suitably qualified arborists to be dead or in terminal decline or the works are for the removal of a tree that is damaged and likely to cause imminent threat to the safety of people or property.	Retain as proposed.
<b>SASM – Sites and Areas of Significance to Māori</b>				
	SASM-R3	Support	The rule is supported as it provides for indigenous vegetation clearance within a wāhi tupuna where it is necessary for maintained or operating a firebreak, or an existing lawfully established road.	Retain as proposed.

	SASM-R3	Support in part	Waka Kotahi seeks the inclusion of lawfully established roads in PER-1.	Amend to include lawfully established roads in PER-1.
	SASM-R6	Support in part	Waka Kotahi seeks the rule to be amended to provide for network utility operators to be included in RDIS-1.	Amend to include network utility operators to be included in RDIS-1.
<b>ECO – Ecosystems and Indigenous Biodiversity</b>				
<b>Ecosystems and Indigenous Biodiversity Objectives</b>	ECO-O1	Support in part	Waka Kotahi seek clarification on the meaning and expectations associated with ‘halting’ the decline of Waitaki’s District indigenous biological diversity.	Provide clarity to halt the decline of indigenous biological diversity.
	ECO-O2	Support in part	Clarification is sought on the expectations to ensure that there is ‘no net loss’.	Provide clarity.
<b>Ecosystems and Indigenous Biodiversity Policies</b>	ECO-P1	Support in part	Waka Kotahi would like to understand the implications and process for requiring the identification of Significant Natural Areas through the resource consent process. It currently appears that this could lead to an onerous process for even minor consent applications and lead to poor outcomes. There is significant risk to having to go through the process as part of a resource consent application and it overtly onerous to applicants.	Clearly identify Significant Natural Areas and clarify the process of when it is unknown if it applies to a site.
	ECO-P2	Support	Waka Kotahi supports the policy as it seeks to protect Significant Natural Areas listed in SCHED6, and whilst the policy seeks to avoid adverse effects this is to the extent ‘as far as practicable’.	Retain as proposed.
	ECO-P3	Support in part	Clarification is sought on the quantification of ‘limited’ in relation to earthworks and indigenous vegetation. There is no provision for infrastructure through the policy where it has a functional or operational need to be located within a Significant Natural Area listed in SCHED6.	Provide clarification on the meaning of ‘limited’.  Amend to include provision for regionally significant/critically significant infrastructure where there is a functional or operational need to be located within the Significant Natural Areas.
	ECO-P5	Support in part	Waka Kotahi seeks the inclusion of ‘where practicable’ for avoiding significant adverse effects on indigenous vegetation. This approach would align with the wording of ECO-P2.	Amend to provide for wording that aligns with ECO-P2 to ensure significant adverse

				effects on indigenous vegetation not listed in SCHED6 is avoided 'where practicable'.
<b>NATC – Natural Character</b>				
<b>Natural Character Policies</b>	NATC-P1	Support in part	Waka Kotahi generally support the intent of this policy, but would seek to be included in the list in (2), so it is also enabled to establish structures and undertake earthworks, vegetation clearance and planting within riparian margins within the state highway road corridor for the purpose of flood and/or erosion management.	Amend (2) to include Waka Kotahi.
	NATC-P2	Support	Waka Kotahi supports the policy, as it recognises and provides for adverse effects on riparian margins as a result of activities with a functional or operational need to locate there. We note that the wording of this policy appears to “allow” ‘significant adverse effects’, yet requires other (less than significant) adverse effects to be remedied and mitigated; is this intentional?	Give further consideration to the treatment of significant adverse effects in this policy. Otherwise, retain as proposed.
<b>Natural Character Rules</b>	NATC-R1	Support in part	Waka Kotahi generally support the intent of this rule, but would seek to be included in the list in PER-3, so it is also enabled to establish structures within riparian margins, which are within the state highway road corridor, for the purpose of flood and/or erosion management.	Amend PER-3 to include Waka Kotahi
	NATC-R2	Support	Waka Kotahi supports this rule because in PER-6 it explicitly provides for vegetation clearance to enable the repair and maintenance of existing and lawfully established roads.	Retain as proposed
<b>NFL – Natural Features and Landscapes</b>				
<b>Natural Features and Landscapes Objectives</b>	NFL-O3	Support in part	Waka Kotahi generally supports the wording of the objective, but seeks for “where practicable” rather than “where appropriate”.	Amend policy to provide a provision for the relevant landscapes to be restored and enhanced, where practicable.
<b>Natural Features and Landscapes Policies</b>	NFL-P6		It is also noted that the title of the policy is ‘Earthworks’ but does not specify that it only applies to earthworks in relation to Natural Features and Landscapes. This could lead to confusion or double-handling to the Earthworks chapter (EW).	Amend the policy title to specify that the policy is particular to earthworks within Natural Features and Landscapes
	NFL-P7		It is also noted that the title of the policy is ‘Buildings and structures’ and does not specify that it only applies to buildings	Amend the policy title to specify that the policy is

			and structures in relation to Natural Features and Landscapes, this could lead to confusion.	particular to Buildings and Structures within Natural Features and Landscapes
<b>SUB - Subdivision</b>				
<b>Subdivision Objectives</b>	SUB-O1	Support	Waka Kotahi supports the objective, which seeks to provide for subdivision that creates allotments and patterns of land development that are compatible with the purpose, character and qualities of each zone.	Retain as proposed.
	SUB-O2	Support	The objective is supported as it seeks to ensure the subdivision occurs in a sequenced and coherent manner and is designed to be accessible and connected to and integrated with existing communities and the transport network.	Retain as proposed.
	SUB-O3	Support	Waka Kotahi supports the intent of the objective for subdivision to be serviced by infrastructure that has been planned and provided for in an integrated manner with sufficient capacity.	Retain as proposed.
	SUB-O4	Support	The objective is supported as it seeks to ensure subdivision does not compromise the operation or safety of Regionally Significant Infrastructure.	Retain as proposed.
<b>Subdivision Policies</b>	SUB-P1	Support	The policy is supported as it seeks to enable subdivision that creates allotments that reflect the intended pattern of development and is consistent with the anticipated role, character and amenity values of the zone.	Retain as proposed.
	SUB-P2	Support	The policy is supported as it provides for boundary adjustments that achieve more efficient and effective use of land.	Retain as proposed.
	SUB-P4	Support	The policy is supported as it seeks to ensure subdivision does not compromise the safe and efficient functioning of the transport network.	Retain as proposed.
	SUB-P6	Support	The policy is supported as it ensures that subdivisions are designed to minimise any adverse effects on the safe and efficient operation, maintenance of, and access to Regionally Significant Infrastructure.	Retain as proposed.
	SUB-P12	Support	Waka Kotahi supports the policy as it seeks to ensure that subdivision is designed and located to maximise accessibility and connectivity with the surrounding community through walkways, cycleways and an interconnected transport network. The policy also seeks to minimise future conflicts with roading and infrastructure, including as a result of the planting of new	Retain as proposed.

			vegetation and provide public open spaces that are within walkable distance from residential allotments.	
	SUB-P13	Support	The policy is supported as it provides for subdivision in Residential Zones where the design, size and shape of allotments is consistent and complementary to the anticipated residential density and form of development for the relevant zone.	Retain as proposed.
	SUB-P16	Support	Waka Kotahi supports the policy, which seeks to provide for subdivision in the Rural Zones where the design, size and shape of allotments incorporates sufficient separation from zone boundaries, transport networks, rural activities and rural industry to minimise the potential for any reverse sensitivity effects and/or conflict with existing and permitted activities on adjacent sites.	Retain as proposed.
	SUB-P17	Support	The policy is support as it provides for subdivision in the Settlement Zones where the design, size and shape of allotments is consistent with and complements the role, function and anticipated scale, type and form of use and development of the relevant zone.	Retain as proposed.
<b>Subdivision Rules</b>	SUB-R1	Support	Support the consideration of the effects of the subdivision on ongoing maintenance of existing flood, erosion and drainage infrastructure or works where the subdivision occurs within the Otago Flood Assessment Overlay and Waitaki River Floodplain Assessment Overlay.	Retain as proposed.
	SUB-R2	Support	Support the consideration of the effects of the subdivision on ongoing maintenance of existing flood, erosion and drainage infrastructure or works where the subdivision occurs within the Canterbury Flood Assessment Overlay.	Retain as proposed.
	SUB-R3	Support	Waka Kotahi support the rule, it is particularly supported that the rule refers to SUB-S2, which requires compliance with TRAN-R1, TRAN-S13, TRAN-S14, TRAN-S15, TRAN-S16 and TRAN-S17. Further, Waka Kotahi support the matter of control that requires consideration of the provision and design of legal and physical access to and from the allotments.	Retain as proposed.
	SUB-R5	Support	Waka Kotahi supports that any subdivision to create an allotment for the purpose of public works, infrastructure, reserves or access does not interfere with any allotments existing access to a road and does not create any non-compliances with other standards for the relevant zone.	Retain as proposed.

	SUB-R6	Support	Waka Kotahi supports the rule as it includes a matter of discretion that relates to the provision and design of legal and physical access to and from the allotments, including legal road when vacant lots are created.	Retain as proposed.
<b>Subdivision Standards</b>	SUB-S2	Support	Waka Kotahi supports the standard that requires all allotments to have legal and physical access to a road and must comply with the relevant standards in TRAN-R1, TRAN-S13, TRAN-S14, TRAN-S15, TRAN-S16 and TRAN-S17.	Retain as proposed.
	SUB-S5	Support	Waka Kotahi supports the rule as it provides for stormwater management and includes matters of control that consider the capacity of stormwater network and potential impacts on downstream flooding.	Retain as proposed.
<b>CE – Coastal Environment</b>				
<b>Coastal Environment Objectives</b>	CE-O4	Support in part	Further information is required to understand the implications of 'no loss'. It is recommended that the objective is amended to reference no net loss, which aligns with the policy framework of Ecosystems and Indigenous Biodiversity Chapter (ECO-O2).	It is recommended that clarity is given on the meaning of 'no loss' of indigenous biodiversity diversity within the Coastal Environment.
	CE-O5	Support	Waka Kotahi supports the objective, which seeks to ensure subdivision, use and development does not increase the risk of social, economic or environmental harm from coastal hazards.	Retain as proposed.
	CE-O6	Support	The objective is supported as it seeks to recognise the risk to existing development in coastal hazard overlays is reduced through natural defences and the option to relocate buildings and structures to areas outside coastal natural hazard overlays is available.	Retain as proposed.
<b>Coastal Environment Policies</b>	CE-P2	Support	Waka Kotahi supports the policy, which seeks to recognise and provide for the preservation of natural character of the Coastal Environment and protect it from inappropriate subdivision, use and development.	Retain as proposed.
	CE-P6	Support in part	The policy is supported to actively improve the natural character of the coastal environment. Waka Kotahi seeks to further information on the incentives for landowners referenced in (2.).	Provide clarity around the means of incentives for landowners within the Coastal Areas of Degraded Natural Character.
	CE-P8	Support	Waka Kotahi supports the policy, which seeks to avoid buildings and structures within the coastal margin unless they have a functional or operational need for their location.	Retain as proposed.

	CE-P18	Support in part	The intent of the policy is largely supported, particularly as there is provision for hard protection structures for regionally significant infrastructure. The policy does not explicitly reference hard protection structures within the Coastal Environment, this may cause some confusion.	Amend policy to provide clarity that it relates to hard protection structures within the Coastal Environment.
<b>Coastal Environment Rules</b>	CE-R1	Support in part	Waka Kotahi seeks to be included within the PER-3.	Provide for works to be undertaken by Waka Kotahi or network utility operators.
	CE-R3	Support in part	Waka Kotahi seeks to be exempt under the rule for the relocation or removal of existing buildings or structures within the Coastal Environment in PER-1.	Provide for works to be undertaken by Waka Kotahi or network utility operators.
	CE-R4	Support in part	Waka Kotahi seeks to be exempt under the rule for the earthworks within the Coastal Environment in PER-1.	Provide for works to be undertaken by Waka Kotahi or network utility operators.
	CE-R8	Support	Waka Kotahi supports that there is a consenting pathway for hard protection surfaces in the Coastal Environment.	Retain as proposed.
<b>EW - Earthworks</b>				
<b>Earthworks Policies</b>	EW-P1	Support in part	Waka Kotahi supports the policy to enable earthworks where the scale, extent and effects are commensurate to the level of development anticipated within the zone or overlay area, however it is recommended that it is clear that this relates to the volumes contained in EW-S1 rather than a subjective level of earthworks.	Provide clarification on meaning of 'commensurate' in relation to the volumes permitted within zones and overlays.
	EW-P2	Support in part	Waka Kotahi supports the general intent of this policy, but notes that the policy requires adverse effects on the identified values of sensitive environment be 'avoided', unless enabled by policy EW-P3, which relates specifically to conservation activities. We suggest this policy be amended to require avoidance, 'where practicable' or 'avoid, remedy, or mitigate', which aligns with the language used in, EW-O1, the objective concerning earthworks in sensitive environments.	Amend the wording to align with EW-O1 or alternatively provide for avoidance of adverse effects where practicable.
	EW-P6		Waka Kotahi supports this policy as it requires the appropriate management of effects from earthworks that may extend beyond the boundary of the site of the earthworks, including land instability effects, and dust, lighting and traffic effects.	Retain as proposed

<b>Earthworks Rules</b>	EW-R2	Support in part	Waka Kotahi seeks the inclusion of 'hard protection structure' under PER-1 for it to be a permitted activity to undertake repair and maintenance within or outside of a sensitive environment. It is also recommended to make it clearer that 'sensitive environment' relates to the definition and applies to several identified areas within the District. It is assumed the digital version will include a hyperlink to the definition in the District Plan.	Amend to include the provision of 'hard protection structure' under PER-1.  It is recommended to clarify that sensitive environment is a definition in the District Plan.
	EW-R5	Support in part	Waka Kotahi supports the intent of this rule, as it permits, in PER-1, earthworks for flood and/or erosion management. Waka Kotahi seeks to be included in the list of authorities identified in PER-1, so that it can also undertake earthworks within a riparian margin for erosion and/or flood management under this rule. We also suggest that PER-3 be amended to include 'hard protection structures'.	Amend PER-1 to include Waka Kotahi. Amend PER-3 to include hard protection structures.
<b>LIGHT - Light</b>				
<b>Light Objectives</b>	LIGHT-O1	Support	The objective is support as it enables artificial outdoor lighting, and ensures outdoor light is designed and located to maintain the safe operation of the transport network and the safety of transport users.	Retain as proposed.
	LIGHT-O2	Support	The objective is supported as seeks to ensure that any new activities that are sensitive to the effects of artificial outdoor lighting is designed and located to minimise conflict and reverse sensitivity.	Retained as proposed.
<b>Light Policies</b>	LIGHT-P1	Support	The policy provides for the use of artificial outdoor lighting that does not compromise road safety.	Retain as proposed.
	LIGHT-P2	Support	Waka Kotahi supports the policy, which seeks to minimise the effects from artificial outdoor lighting	Retain as proposed.
	LIGHT-P3	Support in part	The policy is supported in principle, as it seeks to encourage new sensitive activities in various zones (Town Centre, Open Space, Sport and Active Recreation) to minimise reverse sensitivity effects by ensuring habitable rooms are designed and located to minimise adverse effects of light spill on people's health and well-being. The policy implies all new sensitive activities should be established in these zones rather than more appropriate zones, such as Residential, etc.	Further consider the intent of the policy with the current wording.
<b>Light Rules</b>	LIGHT-R1	Support in part	Waka Kotahi supports the intent of the rule to manage outdoor artificial light, however, seeks PER-2 to be amended to provide	Amend PER-2 to require a colour corrected

			<p>for colour corrected temperature of no greater than 3000K (warm white).          It is supported that PER-3 specifies that PER-1 and PER-2 do not apply to lights of vehicles, trains and aircraft.          Waka Kotahi support with the note that existing use rights would apply to the existing streetlight network, however it does not appear to provide for future streetlights that may be required to maintain the safety of the transport network.</p>	<p>temperature of 3000K (warm white) rather than 2200K.</p>
<b>NOISE – Noise</b>				
<b>Noise Objectives</b>	NOISE-O1	Support	<p>The objective is supported which seeks to ensure activities generating noise and vibration are compatible with the role, function, character and amenity values of the zone and surrounding receiving environment, do not compromise public health or safety, or well-being of amenity values.</p>	<p>Retain as proposed.</p>
	NOISE-O2	Support	<p>Waka Kotahi supports the objective as it identifies the need for new noise sensitive activities to be designed and located in order to minimise conflict and reverse sensitivity effects on existing and authorised noise generating activities.</p>	<p>Retain as proposed.</p>
	NOISE-O3	Support in part	<p>The objective is generally support as it seeks to enable construction and temporary activities that generate noise, but also to ensure adverse effects are minimised. Waka Kotahi would like clarification on the meaning of 'minimised' in the context of the Noise Chapter.</p>	<p>Provide clarification on meaning or intent of 'minimised'.</p>
<b>Noise Policies</b>	NOISE-P1	Support in part	<p>Waka Kotahi seeks further clarification on the meaning of 'reasonable noise limits' and 'anticipated noise levels' and wishes to understand if this is in relation to permitted standards for each of the zones.          The intent of the policy is supported as it seeks to ensure noise generation is appropriate for the zones and receiving environments it occurs in.</p>	<p>Provide clarification on the classification of 'reasonable noise limits' and 'anticipated noise levels'.</p>
	NOISE-P2	Support in part	<p>While the general intent of the policy is supported, Waka Kotahi recommends improving the wording of the policy to provide clarity with stronger language.</p>	<p>Provide clarity on the intent of the policy.</p>
	NOISE-P3	Support in part	<p>The intent of the policy is supported by Waka Kotahi. The policy seeks to enable noise-sensitive activities located in higher noise environments, where they are designed, constructed and maintained to achieve indoor design noise levels to minimise the potential for reverse sensitivity effects, having regard to any adverse effects on the State Highway or rail network, existing lawful noisy activities or businesses within</p>	<p>Provide clarification on what is classed as a 'noisy activity' as this is subjective.</p>

			the Industrial Zone. The policy also seeks to have regard to the outcome of any consultation with Waka Kotahi NZ Transport Agency or KiwiRail. Clarification is sought on the meaning of 'noisy activities' and associated thresholds.	
	NOISE-P4	Support	The policy is supported as proposed.	Retain as proposed.
<b>Exemptions to noise standards</b>	NOISE-E1	Support	Waka Kotahi supports the exemption for vehicles travelling on a road (excluding stationary vehicles) from noise standards.	Retain as proposed.
<b>Noise Rules</b>	NOISE-R5	Support in part	<p>Waka Kotahi supports the inclusion of rules requiring acoustic insulation requirements for the purpose of reducing noise effects from the State Highway network in habitable areas, however it is requested that thresholds for setbacks for the requirements are increased to 50m and 100m. Waka Kotahi should soon (within the next few months) have the national noise contour dataset. This could be used to provide a variable width overly in place of the fixed 50m/100m distances. It is anticipated that this will reduce the area for application of controls. Waka Kotahi would support the use of these contours when they are available.</p> <p>It is also requested that the rule is updated to make it clear that there are different thresholds for 50m (where the legal speed is less than 70km/hr) and 100m (where the legal speed exceeds 70km/hr). The current rule relies on the definition of 'transport corridor' and does not make it explicitly evident to users of the District Plan that there are acoustic installation requirements.</p> <p>Waka Kotahi applies standards identified within the 'Guide to the management of effects on Noise Sensitive Land User near to the State Highway Network' to reduce the health effects on people from road noise. This can include areas that are up to 100m from the boundary of the State Highway. The distance calculated is based on posted speed, road surface, volume of traffic and percentage of heavy vehicles. Having sites limited to be within 40m of a State Highway would limit Waka Kotahi in its ability to reduce the health effects from road noise.</p> <p>A vibration control is also needed either within this rule or as a separate rule. This should require buildings for sensitive activities within 20m of State Highways to be designed and constructed so that a level of 0.3mm/s <math>v_{w,95}</math> is not exceeded.</p>	<p>Amend NOISE-R5 so that the rule is applicable to any site within 50m (where the legal speed limit is 70km/hr or less) and 100m (where the legal speed limit exceeds 70km/hr) of a State Highway.</p> <p>Amend the rule to include the distance for both 50m and 100m, not reliant on the 'transport corridor definition'.</p> <p>Include provision for vibration.</p>

			Waka Kotahi supports the note that any application for resource consent under this rule must be served on Waka Kotahi New Zealand Transport Agency and/or Kiwi Rail.	
	NOISE-R10	Support in part	<p>The reference to NZ68036:1999 Acoustics – construction noise is supported. However, road construction and maintenance often cannot practicably comply. Ideally, a rule would allow for road works to exceed the criteria subject to the use of appropriate management controls. This is also not provided for under NOISE-E1.</p> <p>Currently, where compliance cannot be met, RDIS-1 is triggered, and the relevant matters of discretion are contained in NOISE-P4. Again, this does not provide for construction and maintenance.</p>	Amend to the rule to provide for construction and maintenance of roads with appropriate management controls in place.
<b>Noise Standards</b>	NOISE-S1	Support in part	<p>As above, Waka Kotahi support acoustic insulation requirements to reduce noise effects from State Highway in habitable areas.</p> <p>The current proposed standard does not reflect the acoustic insulation requirement sought by Waka Kotahi for a distance of 50m where the speed limit is less than 70km/hr and 100m where the speed limit exceeds 70km/hr.</p> <p>It is supported that the insulation requirements are included in the standard.</p>	Amend the standard NOISE-S1 is amended so that the rule is applicable to any site within 50m and 100m of a State Highway.
	NOISE-S2	Support	The provision for mechanical ventilation requirements is supported.	Retain as proposed.
	NOISE-S3	Support in part	<p>Waka Kotahi generally supports the inclusion of indoor noise level and mechanical ventilation requirements for new sensitivity and alterations/additions to existing buildings for sensitivity activities within the 'transport corridor'.</p> <p>It is noted that the definition of 'Transport Corridor' in the Draft District Plan means the area within 80m of the boundary of any State Highway or railway designation, but excludes any land where the speed limit applying to the State Highway is less than 70km/hr. Waka Kotahi seeks for this be amended to 100m and make it clear in the standard that this is the requirement.</p>	Amend to 100m and make the requirement clear.
<b>Noise attenuation construction requirements for 30 and 35 dB</b>	NOISE-APP1	Support	The appendix is supported as proposed.	Retain as proposed.

SIGN - Signs				
<b>Signs General</b>	Overview	Support in part	The Signs chapter is supported by Waka Kotahi as it provisions to provide for official signs to be established as well as controls of signs to public spaces, including roads. The sign chapter sets out the provisions for signs in the district ensuring they are compatible with the area and managed appropriate. Waka Kotahi wish for the heading of Note 1. to be amended to 'Signs on State Highways' as it currently reads on or visible from the State Highways, however the explanation of the rule is correct.	Amend heading of Note 1. To 'Signs on or visible from State Highways'.
<b>Signs Objectives</b>	SIGN-O1	Support	This objective is supported, which seeks to ensure signs contribute to the social, cultural and economic well-being of the Waitaki District, while supporting needs of business, infrastructure and community activities, and maintaining character and visual amenity values or zones and maintaining public and transport safety.	Retain as proposed.
<b>Signs Policies</b>	SIGN-P1	Support	Waka Kotahi generally support this policy, which allows signs that are compatible with the role, function and character of the zone they are located in, including official signs and temporary signs.	Retain as proposed.
	SIGN-P2	Support	The policy is supported to provide for signs that do not compromise public health and safety, including road safety.	Retain as proposed.
	SIGN-P3	Support	Waka Kotahi supports the policy in that seeks to prevent off-site signs that are adjacent to the State Highways.	Retain as proposed.
	SIGN-P4	Support	Waka Kotahi supports the policy which seeks to avoid signs on trailers, vehicles and vessels, which are visible from any road or public space.	Retain as proposed.
	SIGN-P6	Support	The policy is supported which recognises that signs are required to be designed, located and maintained so they do not compromise the safe use of the transport network.	Retain as proposed.
	SIGN-P7	Support	Waka Kotahi support the proposal, which seeks to ensure digital signs are enabled in the Town Centre Zone, Commercial Zone, Mixed Use Zone and the General and Heavy Industrial Zone where it can be demonstrated there are no adverse effects on the safety of road users.	Retain as proposed.
	SIGN-P8	Support	The policy is supported as it provides for signs where it is demonstrated they do not compromise public health and safety, including traffic and road users.	Retain as proposed.
<b>Signs Rules</b>	SIGN-R1	Support in part	The rule is support as it provides for official signs. The signs are required to comply with SIGN-S1 and SIGN-S6, which may	Consider implications of rule requirements on

			cause implications for some signage required for the operation of the state highways.	signage required for health and safety reasons.
	SIGN-R2	Support	The rule is supported as it provides for signs related to temporary activities with relevant controls to manage potential effects.	Retain as proposed.
	SIGN-R3	Support in part	The rule is supported, which provides for signs within the Commercial, Mixed Use Zone and Industrial Zones with relevant controls to manage potential effects. Clarification sought of what zones are included in Commercial Zones (e.g. Town Centre Zone, Local Centre Zone) as it is not defined within the District Plan.	Provide clarification.
	SIGN-R4	Support	The rule is supported as it provides for signs within the Residential and Rural Zones with relevant controls to manage potential effects.	Retain as proposed.
	SIGN-R5		The rule is supported as it provides for signs within the Open Space Zone and Sport and Active Recreation Zone with relevant controls to manage potential effects.	Retain as proposed.
	SIGN-R6	Support in part	Waka Kotahi supports the rule for off-site signage as a discretionary activity with the provision that the signage cannot be located adjacent to a State Highway.	Retain as proposed.
<b>Signs Standards</b>	SIGN-S1	Support in part	Waka Kotahi largely supports the standard which seeks to manage any potential adverse effects of signs on the transport network, however the mini. Waka Kotahi seeks Table 11 to be amended to specify the minimum lettering of the main message for 0-50km/hr be 120mm.	Amend Table 11 to provide for a minimum lettering of 120mm where the regulatory speed limit of adjoining road is 0-50km/hr.
	SIGN-S2	Support	The standard is supported which provides relevant controls to minimise distracting features of signs.	
<b>RESZ – Residential Zones</b>				
<b>Residential Zones Objectives</b>	RESZ-O1	Support	The objective is supported that seeks to ensure Waitaki District has well-functioning urban residential environments with sufficient land. The objective also seeks to enable residential needs of the District's present and future urban populations while recognising constraints imposed by the natural and physical environment.	Retain as proposed.
	RESZ-O2	Support	Waka Kotahi supports the objective which seeks to ensure new development in Residential Zones is of a form, scale and design that achieves high standards of amenity, supports community health, safety and wellbeing, provides for changing	Retain as proposed.

			character of higher density living environments and allows for a range of densities, housing typologies and living environments.	
	RESZ-O4	Support	Waka Kotahi supports the intent of the objective which seeks to ensure urban residential environments provide for efficient and sustainable use of land and support reductions in greenhouse gas emissions and are resilient to the future effects of climate change.	Retain as proposed.
<b>Residential Zones Policies</b>	REZ-P1	Support	The policy is supported as it seeks to ensure residential development has a compact form and is occurs in a co-ordinated pattern of development and is sequenced with the delivery of infrastructure including roading, potable water, and stormwater and wastewater disposal. The policy also recognises that reverse sensitivity is minimised where practicable.	Retain as proposed.
	REZ-P2	Support	The policy is support which seeks to ensure new development in residential areas is well designed and laid out with relevant considerations.	Retain as proposed.
	REZ-P3	Support	Waka Kotahi supports the policy which relates to multi-unit development. The policy seeks to provide for multi-unit development in the Medium Density Residential Zone and General Residential Zone. Waka Kotahi supports the consideration of the context and character of the surrounding area and the extent to which it complements surrounding residential development and ensuring the development contributes to amenity and public safety by addressing the street, and where relevant, areas of public open space. In relation to multi-unit development the policy also seeks to provide for vehicle and pedestrian access in a manner that recognises public safety, and pedestrian entrance that is obvious and accessible.	Retain as proposed.
	REZ-P5	Support	Waka Kotahi supports the intent of the policy to provide for certain non-residential activities in residential zones where a local need is demonstrated, the predominant use of the site remains residential or such activities can be generally expected to be found and the activity is compatible with the surrounding environment.	Retain as proposed.
	REZ-P7	Support	Waka Kotahi supports the policy which provides for sustainable design.	Retain as proposed.
	REZ-P8	Support	The policy is supported as proposed, Waka Kotahi particularly supports considering access with safe movements and	Retain as proposed.

			connections relating to new development in residential zones and the intention to provide for peaceful and pleasant living environments which appropriately manage impacts of on-site traffic generation.	
<b>GRZ – General Residential Zone</b>				
<b>General Residential Zone Objectives</b>	GRZ-O1	Support	Waka Kotahi supports the objective which seeks to ensure the General Residential Zone consists of a range of residential unit types and sizes and are carefully designed to provide for a range of higher density living choices.	Retain as proposed.
<b>General Residential Zone Rules</b>	GRZ-R5	Support	The rule is supported as it requires the parking and access for minor residential units to be achieved from the same entrance as the primary residential unit.	Retain as proposed.
	GRZ-R8	Support in part	As 'vehicle movements' are not defined in the District Plan, Waka Kotahi also seeks clarification is the 20 movements is for light vehicles or heavy vehicles. Waka Kotahi also seeks an amendment to the rule that also requires compliance with TRAN-R1 and in order for the proposal to be classed as a permitted activity. This will ensure that vehicle crossings and accesses are formed to accommodate the vehicle movements.	Provide clarification on the meaning of 'vehicle movements' in this context.  Amend the rule to require compliance with TRAN-R1.
	GRZ-R9	Support in part	As 'vehicle movements' are not defined in the District Plan, Waka Kotahi also seeks clarification is the 20 movements is for light vehicles or heavy vehicles. Waka Kotahi also seeks an amendment to the rule that also requires compliance with TRAN-R1 and in order for the proposal to be classed as a permitted activity. This will ensure that vehicle crossings and accesses are formed to accommodate the vehicle movements.	Provide clarification on the meaning of 'vehicle movements' in this context.  Amend the rule to require compliance with TRAN-R1.
	GRZ-R13	Support	Waka Kotahi supports the provision for multi-unit developments within the General Residential Zone as a restricted discretionary activity. It is supported that matters of discretion include the parking and access, extent of impervious surfaces and landscaping and the extent of infrastructure requirements.	Retain as proposed.
	GRZ-R14	Support	Waka Kotahi supports the provision for retirement villages within the General Residential Zone as a restricted discretionary activity. It is supported that matters of discretion include the parking and access, extent of impervious surfaces and landscaping and the extent of infrastructure requirements.	Retain as proposed.

	GRZ-R15	Support	Waka Kotahi supports the provision for community facilities within the General Residential Zone as a restricted discretionary activity. It is supported that matters of discretion include the extent to which the activity may adversely impact on traffic generation, road safety, parking and access, extent of impervious surfaces and landscaping and the extent of infrastructure requirements.	Retain as proposed.
<b>General Residential Zone Standards</b>	GRZ-S3	Support in part	Waka Kotahi seeks a provision to ensure no landscaping required under this rule will obstruct the visibility of accesses. Christchurch City Council requires a visibility splay (contained in Appendix 7.5.9), a similar requirement would be supported by Waka Kotahi.	Further consideration to prevent landscaping obstructing visibility from accesses.
	GRZ-S6	Support	Waka Kotahi supports the standard requiring a minimum road setback of 4.5m. The matter of discretion (4.) when the setback rule is breached is also supported which considers the effect on amenity values of nearby residential properties, including outlook, privacy, dominance, shading, sense of enclosure, noise, odour, dust, glare or vibration. Matter of discretion (5.) is also supported for consideration on pedestrian, cyclist and vehicle safety when compliance is breached.	Retain as proposed.
<b>MRZ – Medium Density Residential Zone</b>				
<b>Medium Density Residential Zone Objectives</b>	MRZ-O1	Support	The objective is supported as it seeks to ensure Medium Density Residential Zone	
<b>Medium Density Residential Zone Rules</b>	MRZ-R5	Support	The rule is supported as it requires the parking and access for minor residential units to be achieved from the same entrance as the primary residential unit.	Retain as proposed.
	MRZ-R8	Support in part	As 'vehicle movements' are not defined in the District Plan, Waka Kotahi also seeks clarification is the 20 movements is for light vehicles or heavy vehicles. Waka Kotahi also seeks an amendment to the rule that also requires compliance with TRAN-R1 and in order for the proposal to be classed as a permitted activity. This will ensure that vehicle crossings and accesses are formed to accommodate the vehicle movements.	Provide clarification on the meaning of 'vehicle movements' in this context.  Amend the rule to require compliance with TRAN-R1.
	MRZ-R9	Support in part	As 'vehicle movements' are not defined in the District Plan, Waka Kotahi also seeks clarification is the 20 movements is for light vehicles or heavy vehicles. Waka Kotahi also seeks an amendment to the rule that also requires compliance with TRAN-R1 and in order for the	Provide clarification on the meaning of 'vehicle movements' in this context.

			proposal to be classed as a permitted activity. This will ensure that vehicle crossings and accesses are formed to accommodate the vehicle movements.	Amend the rule to require compliance with TRAN-R1.
	MRZ-R13	Support	Waka Kotahi supports the provision for multi-unit developments within the Medium Density Residential Zone as a restricted discretionary activity. It is supported that matters of discretion include the parking and access, extent of impervious surfaces and landscaping and the extent of infrastructure requirements.	Retain as proposed.
	MRZ-R14	Support	Waka Kotahi supports the provision for retirement villages within the Medium Density Residential Zone as a restricted discretionary activity. It is supported that matters of discretion include the parking and access, extent of impervious surfaces and landscaping and the extent of infrastructure requirements.	Retain as proposed.
	MRZ-R15	Support	Waka Kotahi supports the provision for community facilities within the Medium Density Residential Zone as a restricted discretionary activity. It is supported that matters of discretion include the extent to which the activity may adversely impact on traffic generation, road safety, parking and access, extent of impervious surfaces and landscaping and the extent of infrastructure requirements. It is also supported that the matter (9.) considers the potential risks of natural hazards and climate change.	Retain as proposed.
<b>RURZ – Rural Zones</b>				
<b>Rural Zones Objectives</b>	RURZ-O3	Support	Waka Kotahi supports the objective to seek to ensure the sustainable growth of rural settlements that provides for housing and commercial activities in the appropriate locations, but maintains rural character through built form control, is responsive to the community and district needs that enables new development as well as redevelopment of existing settlement areas.	Retain as proposed.
	RURZ-O5	Support	The objective, which seeks to ensure rural areas are retained for rural purposes and the establishment of commercial, industrial, service, recreational and large-scale accommodation activities is limited only to those that have a reliance on and functional need, or operational need, for locating in the rural environment is supported by Waka Kotahi.	Retain as proposed.
<b>Rural Zones Policies</b>	RURZ-P1	Support	Waka Kotahi supports the intent of the purpose to main highly productive land for agricultural, horticultural and primary	Retain as proposed.

			production by seeking to avoid fragmentation of existing highly productive land and avoiding subdivision and land use that could result in reverse sensitivity effects.	
	RURZ-P4	Support	The policy is supported which seeks to ensure new development in the Rural Zones is well designed and laid out and is consistent with the environment anticipated for the zone.	Retain as proposed.
	RURZ-P7	Support in part	Waka Kotahi is supportive of providing for minor residential units that are subservient to the primary residential unit on the site. It is noted that within the District Plan there is reference to both the primary and principal dwelling, while 'principal building' is defined. It is recommended to consolidate these terms.	Amend to refer to principal/primary dwelling.
	RURZ-P8	Support	The policy is supported relating to Outline Development Plans as it specifically provides for the extension of existing settlements or rural residential areas where it contributes to a strong sense of place, and a coherent, functional and safe neighbourhood and is co-ordinated with the delivery of appropriate infrastructure.	Retain as proposed.
<b>GRUZ – General Rural Zone</b>				
<b>General Rural Zone Objectives</b>	GRUZ-O2	Support	Waka Kotahi supports the object which seeks to ensure the character of the General Rural Zone remains dominated by open space and vegetation.	Retain as proposed.
<b>General Rural Zone Policies</b>	GRUZ-P1	Support	The policy is supported as it seeks to maintain the rural character in the General Rural Zone and provides for activities reliant on the natural and physical resources of the General Rural Zone while ensuring adverse effects occurring beyond the site are minimised and limiting activities that are not reliant on the resources or do not have a functional or operational need to establish in a General Rural Zone.	Retain as proposed.
<b>General Rural Zone Rules</b>	GRUZ-R2	Support	Waka Kotahi support the rule proposed for amenity tree plantings and shelterbelts, PER-2 is considered to sufficiently manage potential shading effects on the state highways.	Retain as proposed.
	GRUZ-R9	Support in part	As 'vehicle movements' are not defined in the District Plan, Waka Kotahi also seeks clarification is the 20 movements is for light vehicles or heavy vehicles. Waka Kotahi also seeks an amendment to the rule that also requires compliance with TRAN-R1 and in order for the proposal to be classed as a permitted activity. This will ensure that vehicle crossings and accesses are formed to accommodate the vehicle movements.	Provide clarification on the meaning of 'vehicle movements' in this context.  Amend the rule to require compliance with TRAN-R1.

	GRUZ-R15	Support	Waka Kotahi support the rule proposed for carbon forestry, CON-3 is considered to sufficiently manage potential shading effects on the state highways.	Retain as proposed.
<b>General Rural Zone Standards</b>	GRUZ-S6	Support in part	Waka Kotahi requests the rule is amended to require fence posts adjacent to the state highways have a maximum diameter of 100mm so they are considered frangible in the event of being struck by an errant vehicle.	Amend the rule to provide a requirement that any fence post adjacent to the state highways have a 100mm diameter.
<b>RLZ – Rural Lifestyle Zone</b>				
<b>Rural Lifestyle Zone Objectives</b>	RLZ-O2	Support	Waka Kotahi supports the objective which seeks to ensure the Rural Lifestyle Zone maintains a semi-rural character and amenity values distinct from both urban and rural zone and recognises that there are limited opportunities for other activities within the Zone. The objective also recognises the environment of the Zone generally has low levels of noise, traffic, outdoor lighting, odour and dust.	Retain as proposed.
<b>Rural Lifestyle Zone Rules</b>	RLZ-R7	Support	The proposed rule is supported as it requires the parking and access for a minor residential unit to be from the same entrance as the principal resident unit on the site.	Retain as proposed.
	RLZ-R9	Support in part	As 'vehicle movements' are not defined in the District Plan, Waka Kotahi also seeks clarification is the 20 movements is for light vehicles or heavy vehicles. Waka Kotahi also seeks an amendment to the rule that also requires compliance with TRAN-R1 and in order for the proposal to be classed as a permitted activity. This will ensure that vehicle crossings and accesses are formed to accommodate the vehicle movements.	Provide clarification on the meaning of 'vehicle movements' in this context.  Amend the rule to require compliance with TRAN-R1.
<b>SETZ – Settlement Zone</b>				
<b>Settlement Zone Objectives</b>	SETZ-O1	Support	Waka Kotahi supports the objective for the Settlement Zone to provide a focus for rural industry and services and tourism with concentrated areas for housing.	Retain as proposed.
<b>Settlement Zone Policies</b>	SETZ-P1	Support	The policy is supported as within the Settlement Zone it recognises constraints associated within the availability of infrastructure to service new development, and the efficiency and safety of road transport networks.	Retain as proposed.
	SETZ-P2	Support	Waka Kotahi supports the policy, that provides for new settlement use and development that occurs in a form that is concentrated and attached to existing urban areas and makes use of existing and planned transport infrastructure or where not available upgrades, funds and builds infrastructure as	Retain as proposed.

			required. The policy is also supported as it seeks to enable active and passive transport modes and avoids residential activities that have the potential to limit the efficient and effective functioning and upgrade of strategic infrastructure.	
<b>Settlement Zone Rules</b>	SETZ-R4	Support	The proposed rule is supported as it requires the parking and access for a minor residential unit to be from the same entrance as the principal resident unit on the site.	Retain as proposed.
	SETZ-R5	Support in part	As 'vehicle movements' are not defined in the District Plan, Waka Kotahi also seeks clarification is the 20 movements is for light vehicles or heavy vehicles. Waka Kotahi also seeks an amendment to the rule that also requires compliance with TRAN-R1 and in order for the proposal to be classed as a permitted activity. This will ensure that vehicle crossings and accesses are formed to accommodate the vehicle movements.	Provide clarification on the meaning of 'vehicle movements' in this context.  Amend the rule to require compliance with TRAN-R1.
	SETZ-R6	Support	Waka Kotahi support the rule proposed for amenity tree plantings and shelterbelts, PER-2 is considered to sufficiently manage potential shading effects on the state highways.	Retain as proposed.
	SETZ-R9	Oppose	Waka Kotahi does not support the proposed rule, on the basis it creates a permitted rule that relies on third party approval. Additionally, Waka Kotahi will not necessary want to be notified for all commercial activities within the Settlement Zone if it complies with all of the relevant rules and standards in the District Plan, and it is considered that any other non-compliances relating to the commercial activity that may have an impact on the state highways will result in Waka Kotahi being considered an affected party.	Further consideration to the application of the rule.
<b>Settlement Zone Standards</b>	SETZ-S4	Support	Waka Kotahi support the standard proposed.	Retain as proposed.
	SETZ-S9	Support	The standard is supported by Waka Kotahi that requires all outdoor storage with activities other than residential, recreational or farming activities shall be screened by from adjoining roads by planting, walls, fences or a combination to a height of at least 1.2m. This is supported as it will minimise distraction from users of the transport network.	Retain as proposed.
	SETZ-S10	Support in part	Waka Kotahi supports the intention of the standard, however it is sought that clarification is provided to ensure that the landscaping does not compromise the safety of accesses. Any landscaping should not create shading or icing issues, obstruct visibility of vehicles crossings or traffic signs.	Amend rule to ensure landscaping does not create shading effects of obscure visibility from accesses.

LCZ – Local Centre Zone				
<b>Local Centre Zone Policies</b>	LCZ-P1	Support in part	The policy is generally supported as it seeks to ensure building and site development is carried out in a manner that is compatible with the anticipated purpose, character and qualities of a Local Centre Zone, however it is sought that (3.) is broadened to provide for all verandas that may project over the corridor of the state highways.	Amend to provide for all verandas within the state highway.
	LCZ-P3		Waka Kotahi supports the policy that require noise sensitive activities within the Local Centre Zone to only be enabled where the potential reverse sensitive effects are minimised through the incorporation of acoustic measures in habitable rooms.	
<b>Local Centre Zone Standard</b>	LCZ-S9		The standard is supported by Waka Kotahi that requires any outdoor storage of goods to be fully screened by fence, landscaping or building, or a combination of these so it is not visible from any public space. This is supported as it will minimise distraction from users of the transport network.	Retain as proposed.
MUZ – Mixed Use Zone				
<b>Overview</b>	General comments	Neutral	There appear to be inconsistencies with the objectives and policy framework and the rule structure in this chapter compared to the other zoning chapters. There is minimal explicit consideration of the potential adverse effects of mixed-use development in relation to transport effects or state highways.	
<b>Mixed Use Zone Objectives</b>	MUZ-O1	Support	Waka Kotahi supports the intent of the objective to ensure that the Mixed Use Zone accommodates a range of compatible activities.	Retain as proposed.
	MUZ-O2	Support in part	The objective is largely supported, however, further clarification is sought on what is deemed to be a 'reasonable standard' in (2.). Clarification is also sought around the use of the word 'contribute', i.e. Mixed Use Zone activities and development contribute to traffic effects.	Provide clarity.
	MUZ-O3	Support	Support the intent of the objective to maintain a consolidated urban form in restricting the scale and nature of retail activities so not to compromise the function, integrity, convenience and viability of retailing in the Town and Local Centre Zones.	Retain as proposed.
	MUZ-O4	Support	Support the intent of the objective to increase the number of people living in Mixed Use Zone and close to the Town Centre Zone.	Retain as proposed.

<b>Mixed Use Zone Policies</b>	MUZ-P2	Support	Waka Kotahi supports the policy, which seeks to require building and site development to be carried out in a manner that is compatible with the role, function and scale of a Mixed Use Zone. It is particularly supported that the policy references the need for outdoor storage to be screened from neighbouring sites and general public.	Retained as proposed.
	MUZ-P6	Support	The policy is supported, which considers reverse sensitivity and incorporation of acoustic treatment in habitable rooms.	Retained as proposed.
	MUZ-S6	Support in part	Waka Kotahi supports the intention of the standard, however it is sought that clarification is provided to ensure that the landscaping does not compromise the safety of accesses. Any landscaping should not create shading or icing issues, obstruct visibility of vehicles crossings or traffic signs.	Amend rule to ensure landscaping does not create shading effects of obscure visibility from accesses.
<b>TCZ - Town Centre Zone</b>				
<b>Town Centre Zone Policies</b>	TCZ-P5	Support	Waka Kotahi supports the policy that require noise sensitive activities within the Town Centre Zone to only be enabled where the potential reverse sensitive effects are minimised through the incorporation of acoustic measures in habitable rooms.	Retain as proposed.
	TCZ-P7	Support	The policy is supported as proposed.	Retain as proposed.
<b>Town Centre Zone Standards</b>	TCZ-S8	Support in part	Waka Kotahi supports the intention of the standard, however it is sought that clarification is provided to ensure that the landscaping does not compromise the safety of accesses. Any landscaping should not create shading or icing issues, obstruct visibility of vehicles crossings or traffic signs.	Amend rule to ensure landscaping does not create shading effects of obscure visibility from accesses.
<b>GIZ – General Industrial Zone</b>				
<b>General Industrial Zone Standards</b>	GIZ-S6	Support in part	Waka Kotahi supports the intention of the standard, however it is sought that clarification is provided to ensure that the landscaping does not compromise the safety of accesses. Any landscaping should not create shading or icing issues, obstruct visibility of vehicles crossings or traffic signs.	Amend rule to ensure landscaping does not create shading effects of obscure visibility from accesses.
	GIZ-S10		The standard is supported by Waka Kotahi that requires any outdoor storage of goods to be fully screened by fence, landscaping or building, or a combination of these so it is not visible from any public space. This is supported as it will minimise distraction from users of the transport network.	Retain as proposed.
<b>HIZ – Heavy Industrial Zone</b>				
<b>Heavy Industrial Zone Policies</b>	HIZ-P4		Waka Kotahi supports the intent of the policy to avoid sensitive activities, including residential activities, that are incompatible	Retain as proposed.

			with the role, function, character and amenity values associated with the Heavy Industrial Zone.	
<b>Heavy Industrial Zone Standards</b>	HIZ-S5	Support in part	Waka Kotahi supports the intention of the standard, however it is sought that clarification is provided to ensure that the landscaping does not compromise the safety of accesses. Any landscaping should not create shading or icing issues, obstruct visibility of vehicles crossings or traffic signs.	Amend rule to ensure landscaping does not create shading effects of obscure visibility from accesses.
<b>OSZ – Open Space Zone</b>				
<b>Open Space Zone Objectives</b>	OSZ-O2	Support	The objective is supported as it seeks to ensure the character and amenity values of the Open Space Zone are protected.	Retain as proposed.
<b>Open Space Zone Policies</b>	OSZ-P4	Support	Waka Kotahi also supports the policy to avoid inappropriate subdivision and use within the zone.	Retain as proposed.
<b>SARZ – Sport and Active Recreation Zone</b>				
<b>Sport and Active Recreation Zone Policies</b>	SARZ-P2		Waka Kotahi supports the policy which seeks to maintain the character and amenity values of the Sport and Active Recreation Zone, particular support is given to enabling use and development that appropriately addresses traffic generation, vehicle access and parking demand on or in the vicinity of the site.	Retain as proposed.
<b>SPZL – Special Purpose Zone Lakes</b>				
<b>Specific Purpose Zone Lakes Policies</b>	SPZL-P8	Support	Waka Kotahi supports the intent of the policy to provide safe and efficient access from State Highway 83.	Retain as proposed.