

Appendix 3
Submissions on Withdrawn Provisions¹

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General Submissions **2**

¹ This Appendix does not include further submissions made on the listed submissions

General Submissions

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary
170.1	Aggregate and Quarry Association	General	General	Oppose	Opposes progression of the PDP as LUC 3 is currently to be removed from the NPS-HPL in which case HPL land doesn't apply and the Overlays will be inaccurate. Also, should the NPS-IB change through amendments in the future then the PDP will be contrary to the established national direction. [Refer to original submission for full reasons]	Seeks postponing the PDP until the Government's changes to the National Direction instruments are confirmed.
178.9	Alastair & Sandra Gibson	General	General	Oppose	Considers that the notification and hearings process for specific chapters (SASM, NFL, NATC, ECO) should not continue until RM reform is complete. Concerns that continuation may result in inconsistencies with future legislation, leading to costly revisions.	Seeks to remove the SASM, NFL, NATC and ECO chapters from the PDP until the RM reform has been completed.
196.10	Mark and Jayne Strachan	General	General	Oppose	Considers that the notification and hearings process for specific chapters (SASM, NFL, NATC, ECO) should not continue until RM reform is complete. Concerns that continuation may result in inconsistencies with future legislation, leading to costly revisions.	Seeks to remove the SASM, NFL, NATC and ECO chapters from the PDP until the RM reform has been completed.
202.49	Waitaki Whitestone UNESCO Global Geopark Trust Board	General	General	Amend	Considers that all geosite polygons should be mapped in the PDP so they are discoverable as opposed to only being listed in the feature descriptions.	Seeks to include identification of specific geosite polygons on the PDP mapping.
212.1	Glenbrook Station	General	General	Oppose	Considers that the PDP fails to acknowledge the economic challenges of high-country stations and does not enable Glenbrook Station's continued operation and diversification. The submitter considers the extent of overlays and lack of economic analysis to be a significant failing that restricts reasonable development. [refer to original submission for full reasons]	Seeks for those overlays to be removed from Glenbrook Station, or if that is not accepted, put on hold until the resource management reform is complete. Seeks such other relief as may be required to give effect to this submission, including any alternative, consequential or necessary amendments to the provisions of the PDP that address the matters raised by the Submitter and to: a. promote the sustainable management of resources and achieve b. the purpose of the Act c. meet the reasonably foreseeable needs of future generations d. enable social, economic, and cultural wellbeing e. avoid, remedy, or mitigate the adverse effects of the activities enabled by the PDP f. represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of other means available in terms of s 32 and other provisions of the Act. The above general relief should not derogate from the specificity of the above relief sought. A more refined suite of amendments may be provided in any expert planning evidence.
227.1	Janice Wheeler	General	General	Oppose	Opposes Designations, Maps, Environmental and Cultural Mapped property Overlays; Schedules; RMA Section 6. All of the [objectives/policies/rules/standards/overlays] regarding SNA, SNF, ONL, ONF, RSL, SASM. Strongly opposes the extreme and extensive Environmental and Cultural Mapped Overlays over Houses, Businesses, Sections, Land and Farms in Waitaki District; PDPs serious barriers of unworkable Rules; regulatory erosion of private property rights; and jeopardising the future economy, business and prosperity of the whole district and community as evidenced by the attached Petitions in opposition. Overlays on Private Land are substantial, invasive and Rules are restrictive and will damage farmers livelihoods and community jobs; devalue land; there are security issues due to public access without landowner approval; loss of the day-to-day management of farms; lack of site-specific values; incorrect Maps; lack of transparency; equality and lack of the proper process regarding communication and consultation with houses / landowners; 'breach of Mandate' at times by WDC staff (Planning) and Contracted Landscape Architects who disregarded landowners and homeowners while consulting intensively with outside stakeholders. Numerous requests for site visits to discuss property mapped overlays were refused by WDC Planning Staff. Many houses / landowners were never informed of Section 6 Maps over their homes and neighbourhoods. This has been very stressful for all ratepayers but especially for those affected. The s32 is deficient in terms of economic effects on landowners and the wider community.	Seeks that: - WDC halt All Mapped Overlays Now and await Govt Reform (RMA Decisions) in 15 months time in January 2027; - Any Mapped overlay which now has legal effect-has it removed by WDC; - WDC considers Section 85(2), (3) in regard to reasonable use. WDC will be challenged on this and (3) placing an unfair and unreasonable burden on any person having an interest in land; - WDC halt all Mapped Overlays and await Central Government RMA Reform (Based on Private Property Rights) which will be completed by January 2027. WDC will be expected to action this Reformed RMA-immediately in 2027; - With s32 why have WDC not done their duty in considering alternatives, assessing economic benefits and costs ? WDC must do this before the Overlays mapped on private property take legal effect. Why have some Section 6 classifications been given legal effect ? - WDC halt all Mapped Overlays now and await Govt RMA Reform decisions January 2027 in 15 months; - WDC removes immediate legal effect from the Enviromental and Cultural Mapped Overlays as they do not have validated sites or features which need to have documentation / validation before mapping on private property can be undertaken by WDC;

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					Percentage-wise Environmental and Cultural Mapped Overlays cover 80% of Waitaki District of which the Total Area is 721, 395 Hectares; Environmental Map Overlays are 541, 429 Hectares is 75% of Waitaki District land; Cultural Map Overlays are 34, 429 Hectares is 5% of Waitaki District land. The WDC and Ngai Tahu consent costs, Rules and regulations over most of Waitaki District Land will debilitate many businesses, the community and employment downstream. The World Economic Forum and UNESCO Global Waitaki Geopark-2023 has also motivated these Overlays. [See original submission]	- Stop WDC ratepayer funding Geopark as there has been no financial return in 6 years thus far.
227.10	Janice Wheeler	General	General	Oppose	Opposes all environmental and SASM's Mapped Overlays over private property without Council first agreeing upon a compensation value with the property owner.	Seeks that: All environmental and SASM's Mapped Overlays over private property are only proposed pending Council first agreeing upon a compensation value with the property owner. Disputes could be referred to either the Planning Tribunal or existing Land Valuation Tribunal (established under the Public Works Act 1981). [Inferred relief sought]
234.7	Minus One Trust	General	General	Oppose	Opposes the PDP notification or hearings process continuing on the SASM, NFL, NTC and ECO Chapters until the RMA Reform has been completed and the approach to considering effects has been decided upon.	Seeks to withdraw the PDP SASM, NFL, NTC and ECO Chapters until the RMA Reform has been completed and relevant provisions are clear.
236.5	Schultz Enterprises Limited and EN & MJ Schultz Trust Partnership	General	General	Oppose	Opposes the notification and hearing process for SASM, NFL, NATC and ECO as the RMA is being replaced by two new Acts.	Seeks that the updating of the PDP SASM, NFL, NATC and ECO Chapters are delayed until the new Natural Environment and Planning Acts are passed into law.
246.5	Federated Farmers of New Zealand Incorporated	General	General	Oppose	Consider that the Skink Habitat Management Area is subject to stringent vegetation and planting rules despite lacking any policy justification or SNA status, making it hard to assess the necessity of these controls. The submitter argues that without a clear rationale or policy framework, the restrictive provisions—such as requiring consent for any clearance or even planting a single exotic tree—are difficult for the public to meaningfully evaluate. The Skink management area is opposed [See original submission for full reasons]	Seek the Council provide the information that has resulted the need to identify a Skink Habitat Management Area, why this area was not included as an SNA, and why the planting of a single exotic amenity tree in this area requires consent.
256.2	Fish and Game (Otago and Central South Island Fish and Game Councils)	General	General	Support	The submitter appreciates that WDC has taken the time to consider the CSI and Otago Sport Fish and Game Management Plan.	Seeks to retain as notified.
261.3	Glenmoa Farms Ltd	General	General	Oppose	Opposes all provisions of the General Rural Zone chapter as a whole. [Refer to original submission for full reasons]	Seeks the withdrawal of the entirety of the GRZ Chapter. Seeks removal of submitters land from any limiting Genera Rural Zone Rules, Chapters, Appendices, Schedules, Objectives, Policies or Procedures that impact on the current or future land use for the reasons set out in Reasons 1-6, and in the narrative statement and in the submitters reasons.