Thank you for the time to speak today. My name is Kate Murcott, I am here today as the chair of WPG. I am a farmer as well as a rural professional working with landowners regarding resource consenting and farm environmental planning. I am not a planner so please excuse my simple terminology.

Morgan Smith joins me here today, Morgan has been supporting WPG through the plan review process as our planning consultant. Morgan has extensive consenting and policy development experience, including work within the Waitaki District in both preparing consents for private clients and previously processing a range of resource consents on behalf of Council. Morgan also has significant experience preparing and processing resource consents nationally, including processing for every TA within Otago and Southland. Morgan has also been involved, in both supporting and lead roles, in plan reviews, plan changes and full plan reviews across the country as well as reviews of national direction for central government.

I just wanted to take a moment to firstly outline who WPG are as I think this is important. WPG was formed in November 2024 after concern was raised from Waitaki District residents over the process of forming the content of parts of the PDP. Over time this concern then extended to how changing national regulation would impact the process and potential longevity of the proposed plan, and the cost this would have to us as ratepayers.

WPG has 256 members, of which 249 members are permanent Waitaki District Residents. We represent residents from both our rural and urban demographic. Our diversity as a group presents challenges but also shows our united front in regard to wanting the best for our district and the commitment to work together to help shape that.

Our intent is to represent the members of WPG through the PDP process and ensure the resulting plan is pragmatic and practical to implement for the residents of Waitaki.

Energy and Infrastructure

- WGP generally supports the approach to provide for energy infrastructure, where the adverse effects on people, communities and the environment can be appropriately managed.
- WPG submission sought to ensure the policy framework and associated rules align with national direction and higher order planning documents, whilst also ensuring that there is sufficient emphasis on the character and values of communities and local environments within the Waitaki District being an important consideration in locating and developing larger scale energy or infrastructure proposals.

- Our submission points sought to strengthen that through ensuring that the social, cultural, economic wellbeing for people and communities is an important consideration for large scale infrastructure proposals.
- While the energy and infrastructure chapters have a predominant focus on positive effects, the proposed discretionary (or non-complying) default activity status should be guided by a policy framework which better highlights the social, cultural and economic effects on the people and communities as an important consideration to where these projects locate either through amendments to the policy framework as requested, or the addition of a new sub-clause or policy.

Reasoning

- Infrastructure and energy projects can have both positive and negative effects on communities and environments. For many large-scale projects, the merits of a proposal to achieve positive socio-economic effects can easily be demonstrated at a district, regional, national or international scale i.e. effects of climate change or employment within a region, but this can overlook the potential negative socio-economic or direct effects on the receiving environment including the people and community where these projects are located.
- We consider it is important that the policy framework within each relevant chapter highlights the importance of considering the socio-economic effects of a proposal on the people and communities where large-scale development projects for energy and infrastructure (as well as other larger scale land use changes) are proposed.
- For example, a windfarm proposal may result in significant socio-economic benefits in terms of energy resilience, climate change emission targets, GDP at a national scale. Similarly, at a regional and district scale these can support benefits at the construction phase through employment, accommodation demand, ancillary industry support, GDP/local spending in key service towns and larger urban centres.
- However, looking at this through a small-scale community lens the socio-economic effects could also be quite significant on the long term "health" of a rural community. If we could use an example that has already been experienced in the Waitaki District and in many of our small rural communities nationwide, that is the significant land use change from pastoral farmland to forestry. The loss of production land can ultimately result in the loss of local employment opportunities within the nearby rural community, as well as a loss of business and sufficient customers for the local ancillary rural services or industry. This could include tailing and crutching runs, casual musterers, shearing contractors, local engineers, vets, agronomists, cartage and fertiliser spreading…the list goes

on. Then there is the effects on schools, church groups, local sports and arts clubs in the area including the potential loss of the school bus run or local schools. These are just some examples of potential adverse socio-economic effects that we believe should be important considerations in these proposals particularly given the nature of the Waitaki District and the importance of our rural communities.

- There can also be a misconception that some energy or infrastructure projects are compatible with current land use practice, but these don't always account for the more intensive farming systems where in reality, large turbines or solar panels can prevent or reduce the options or ability to improve or maintain pasture through the restrictions on aerial applications or tractor and implement access. This ultimately results in challenges maintaining or improving efficiencies and productive potential within an existing farming system and we consider that these should be highlighted as important considerations for development proposals.
- That is why we have sought to highlight these in the respective chapters' policy frameworks where it is appropriate to do so, so those effects can be appropriately considered.
- By emphasising the effects that need to be considered at a people and community level, the policy framework can provide direction to developers and decision makers to consider all of the relevant effects and whether these can be adequately managed.

Outcome

- Our submission seeks to clarify that the social, cultural and economic wellbeing for people and communities within the district should be an important consideration embedded within the policy framework of each chapter to help direct decision makers to consider and/or better manage the effects on people and communities for those specific development proposals.
- The proposed revisions by the s42A report considers that these are sufficiently embedded within the strategic direction objectives and policies, however, we do not agree that this provides sufficient guidance and consider that it is also appropriate to highlight the need to consider these effects within the relevant plan chapters.
- Whilst we do not oppose the streamlining of objectives and policies, we think it is vitally important that socio-economic effects on localities, communities and people from all types of energy and large-scale infrastructure developments can be appropriately considered.

- If changes to INF-O3, INF-P4 and ENG-P6 as sought by WPGI are not to be incorporated, a possible alternative position by WPGI could be further amendments to the strategic directions to achieve this.

Infrastructure – other key WPGI submission points

- **Definitions –** Support the inclusion of the proposed 'Regionally Significant Infrastructure' definition in the PDP. WPG notes that it is important to include community scale irrigation as this is a significant contributor to the local economy and businesses throughout the district.
- In terms of the community potable water changes, it is unclear why the proposed amended definition within the s42A report appears to link to the Taumata Arowai Water Services Authority standards in terms of what is considered a small network supply for registration purposes, and may unnecessarily preclude some smaller community water supplies serving small community areas from the infrastructure provisions.
- We support retaining the wording proposed by the PDP in terms of communities' scale drinking water supplies being captured by the Regionally significant Infrastructure definition.
- **INF-R29 –** concerns that the proposed rule revisions supported by s42A report will unnecessarily restrict farming activities within the national grid corridor.
    - WPG have concerns that the restriction of fencing locations in relation to the National Grid could impact existing primary production activities by stopping the change of an existing fence location of a similar effect. For example, if you were to subdivide a property and create a new boundary, you would have to seek RC (and likely APA from Transpower) to put up a new boundary fence.
    - If pastoral land, which is very common on the national grid, was being strip grazed within an existing paddock with a temporary fence, you may require a resource consent for putting up a hot wire to manage the 'break' within the national grid area based on the proposed wording.
    - We consider that the height controls proposed are sufficient to address these concerns without requiring additional setback requirements for all activities and structures.
    - We also oppose changes to provisions for irrigation equipment as these may have a functional need to locate in these areas. The nature of irrigation equipment could mean the revised wording limits even a k-line irrigation style activity, where the irrigation is portable and temporary in nature or fixed grid irrigation that allows for safe irrigation and provides for

vehicle access. The removal of water reticulation and storage could also impact the ability to locate a water trough or new water pipes which have an operational need to locate within the national grid but would not impact the operation or access to the national grid.

    - Consider that the reference to New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001) ISSN 01140663 is appropriate to manage any setbacks of buildings associated with residential activities from the national grid.

    - Supports the exclusion of artificial crop protection structures as set out by the s42A recommendations but consider that general pastoral grazing activities which are common under the national grid in Waitaki need to be better provided for and consider the initial drafted rule was sufficient to achieve that.

- **EW-P6 and EW-R6** – This policy and earthwork rule relate to earthworks that may occur within the national grid. These can pick up earthworks undertaken by landowners or occupiers within the national grid. Plan users that are not infrastructure companies are not going to easily understand that they also need to check these chapters if they intend to do earthworks within the national grid to ensure they comply with the earthwork requirements. Whilst this creates efficiencies for Transpower, it creates a significant risk of increased non-compliance if earthwork rules relevant to general plan users are 'scattered throughout the Plan' and ultimately a risk to Transpower/national grid infrastructure. WPG seek that the Earthwork provisions of the Plan that relate to general plan users remain in one place to ensure consistency in approach and ease for plan users.

Transport

- **TRAN-R1** – We do not support the additional rule proposed to require any new or altered vehicle crossing to a state highway to require resource consent, especially if crossings meet the location and design guideline requirements of NZTA and are located within low-speed environments. We feel this results in a duplication of the NZTA permit process into a resource consent process as well.

Earthworks EW-R1 and EW-S1

- The earthworks rule permits general earthworks where these comply with the threshold areas of EW-S1, however, our submission flags concerns about the low threshold set for the General Rural Zone.

    - The current ODP sets a very low threshold for earthworks which has resulted in a significant consenting burden. While we recognise that the

limit has been increased to 500m^2, this standard area approach does not take into account the nature and character of the rural zone and the many activities required to support the function of this zone. We believe the proposed threshold will still result in a significant number of consenting requirements for everyday rural activities.

- One concern is that the standard notes that it is to exclude building platforms, but it is not clear if these are registered building platforms or general building platform areas as the term is not defined in the Plan and could be interpreted differently by different plan users.
- Our submission sought to exempt earthworks associated with building consents to recognise that where the earthworks relate to establishing building foundations that the building consent process is sufficient to manage any potential adverse effects associated with establishing that building footprint. This is an approach used in the DCC 2GP for small scale earthworks and we consider would be appropriate to adopt within the PDP. The s42A report has not considered the merits of this approach compared to just the building platform approach, especially considering other district plans utilise this currently.
- To clarify, we also support the exclusion of earthworks from the threshold within building platform areas where the soil is retained within the site, as notified by the PDP. We support EW-R1 where the standards appropriately provide for low-risk earthwork activities.

- **EW-S1** – We have proposed an alternative mechanism to address earthwork areas within our submission as the thresholds set is too low.
    - The proposed threshold in the General Rural Zone fails to account for differing property scales, these sites tend to encompass a range of site sizes, including large scale agricultural landholdings.
    - If a 500m^2 area was retained, general rural activities would trigger numerous consenting requirements given the definition of earthworks. If I could give some examples:
        - Establishment of silage pits, fencelines, land-based water treatment or management systems, drainage improvements or new irrigation infrastructure installation.
        - These are true examples of where earthworks consent has been triggered and would remain under the proposed thresholds;
            - A 4000 hectare hill block that needs to bulldoze in new firebreaks to carry out consented controlled burning would

also require an earthworks consent.The total % of the property this effects is 0.5% with no earthworks to occur in sensitive areas (as identified in site development standards if they remain).

- A new effluent pond to replace an existing pond, a land use consent for the construction and use of the pond is required from Regional Council as well as an earthworks consent which would be triggered due to size over 500m2.
- Or Farm tracks - a new stock lane at 8m in width would trigger consent at 62.5m in length.

- We believe thresholds should be linked to the actual or potential adverse effects risks, and we have considered that volume thresholds linked to slope degree over a certain area would result in better management of actual or potential adverse effects of earthworks occurring within the General Rural Zone.
- The s42A report considers some of the relief sought by other submitters but fails to take into account the character of the District. WPG have flagged exactly that issue with the proposed standards in our submission and that is exactly what our relief sought attempts to account for.
- The s42A report has not provided any justification for why the PDP provisions are more efficient or effective than the WPG relief sought. The WPGI relief sought follows an effects-based framework which is based on a similar approach adopted in the DCC 2GP. We have recommended this approach as we consider that the Dunedin rural environment has similar characteristics to the Waitaki District given the similar rolling/sloping nature and through experience, consider this approach can work well to manage effects.
- We also highlighted in our submission that the standard discusses threshold areas for earthworks; however, the standards relate to quantity of earthworks, which is generally measured as a volume. The rule should clarify the total area or measure as a volume to avoid confusion.
- If the preference of the panel is to retain a maximum area approach, we would seek that the area threshold be substantially increased to a similar size area that would be achieved from what our submission proposed or the definition be reviewed to exempt many low risk farming activities such as firebreaks, silage pits, offal holes, effluent and water storage systems, farm tracks and ancillary farm buildings.

- **Finally -** The interface of the ODP and the PDP in terms of earthwork thresholds is confusing, and it is unclear if the Operative site development standards will still be retained for the General Rural Zone. If they remain plan users will be required to cross reference the site development standards of the ODP, which include slope, to understand if earthworks trigger consent requirements. Our submission sought to address slope and volume within the provisions of the PDP to avoid that confusion for plan users.

Thank you for the opportunity to present our submission and we welcome the opportunity to respond to any questions that you may have.