Proposed Waitaki District Plan

# Section 42A Report: Subdivision

Report on submissions and further submissions

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Waitaki District Council | TE KAUNIHERA Ā ROHE O WAITAKI

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## Appendices

**Appendix 1** Recommended Changes to Provisions
**Appendix 2** Recommended Responses to Submissions
**Appendix 3** Submissions on Withdrawn Provisions

# Abbreviations

| Abbreviation | Full Text |
|---|---|
| **Council** | Waitaki District Council |
| **CLWRP** | Canterbury Land and Water Regional Plan 2025 |
| **CRPS** | Canterbury Regional Policy Statement 2013 |
| **ERP2** | New Zealand's Second Emissions Reduction Plan 2026-2030 |
| **NAP** | Aotearoa New Zealand's first national adaptation plan 2022 |
| **NEB** | Natural Environment Bill 2025 |
| **NES** | National Environmental Standard |
| **NES-CF** | National Environmental Standards for Commercial Forestry 2023 |
| **NES-CS** | National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 |
| **NES-DMRU** | National Environmental Standards for Detached Minor Residential Units 2025 |
| **NES-ETA** | National Environmental Standards for Electricity Transmission and Electric Vehicle Charging Infrastructure Activities 2026 |
| **NES-FW** | National Environmental Standards for Freshwater 2020 |
| **NES-P** | National Environmental Standards for Papakāinga 2026 |
| **NES-DW** | National Environmental Standards for Sources of Drinking Water 2007 |
| **NES-TF** | National Environmental Standards for Telecommunication Facilities 2016 |
| **NPS** | National Policy Statement |
| **NPS-EN** | National Policy Statement for Electricity Networks 2008 |
| **NPS-FM** | National Policy Statement for Freshwater Management 2020 |
| **NPS-HPL** | National Policy Statement for Highly Productive Land 2022 |
| **NPS-I** | National Policy Statement for Infrastructure 2025 |
| **NPS-IB** | National Policy Statement for Indigenous Biodiversity 2023 |
| **NPS-NH** | National Policy Statement for Natural Hazards 2025 |
| **NPS-UD** | National Policy Statement on Urban Development 2020 |
| **NPS-REG** | National Policy Statement for Renewable Electricity Generation 2011 |
| **NPStds** | National Planning Standards 2019 |
| **NZCPS** | New Zealand Coastal Policy Statement 2010 |
| **ODP** | Operative Waitaki District Plan |
| **ORPS** | Otago Regional Policy Statement 2021 |
| **PDP** | Proposed Waitaki District Plan |
| **PLAN STOP** | RM (Consenting and other Changes) Amendment Act 2025 |
| **RMA** | Resource Management Act 1991 |
| **SPA** | Spatial Planning Act 2023 |

# 1 Submitters Addressed in Report

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

**Table 1: Original Submitters Addressed in this Report**

| Sub | Submitter Name | on Behalf of | Abbreviation |
|---|---|---|---|
| **1** | Gordon Clark | | G Clark |
| **43** | Tim Walton | | T Walton |
| **51** | James White | Brian de Geest | B de Geest |
| **73** | Marcelo Carena | | M Carena |
| **83** | Waitaki District Council | | WDC |
| **96** | Cat Prunty | | C Prunty |
| **106** | James White | | J White 2 |
| **107** | Cameron Leckie | | C Leckie 2 |
| **122** | Kitty Culp | | K Culp |
| **147** | Peter Plunket | | P Plunket |
| **149** | Malcolm John McKenzie | | M McKenzie |
| **152** | New Zealand Transport Agency Waka Kotahi | | NZTA |
| **163** | Fire and Emergency New Zealand | Fire and Emergency New Zealand | FENZ 2 |
| **164** | NPHS Te Waipounamu | | NPHS |
| **165** | Bryry Trust | | Bryry Trust |
| **166** | Horticulture New Zealand | | HortNZ |
| **168** | Kāinga Ora | | KO |
| **172** | Bog Roy Station Limited | | Bog Roy Station |
| **176** | Terramark Limited | | Terramark |
| **193** | Ōhau Company Trust (Shelton Downs Station) | | Shelton Downs |
| **194** | Director-General of Conservation | | DOC |
| **195** | New Zealand Pork Industry Board | | NZ Pork |
| **197** | PowerNet Limited | | PowerNet |
| **200** | Mike Lowe | | M Lowe 2 |
| **233** | KiwiRail Holdings Limited | | KiwiRail |
| **242** | Ministry of Education Te Tāhuhu o Te Mātauranga | | MOED |
| **243** | Whitestone Contracting Limited | | WCL |
| **244** | Telecommunication Companies | | Telcos |
| **246** | Federated Farmers of New Zealand Incorporated | | FFNZ |

| Sub | Submitter Name | on Behalf of | Abbreviation |
|---|---|---|---|
| **251** | Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki | | Kā Rūnaka |
| **252** | Hollamby Family Trust | | Hollamby Trust |
| **253** | Royal Forest and Bird Protection Society of New Zealand Incorporated | | Forest & Bird |
| **255** | Bill and Angela Johnston | | B & A Johnston |
| **256** | Fish and Game (Otago and Central South Island Fish and Game Councils) | | Fish & Game |
| **257** | Heritage New Zealand Pouhere Taonga (HNZPT) | | HNZPT |
| **258** | Bryce Burnett | | B Burnett |
| **259** | Otago Regional Council | | ORC |
| **266** | The Egg Producers Federation of New Zealand (EPFNZ) and the Poultry Industry Association of New Zealand (PIANZ) | | EPFNZ & PIANZ |
| **271** | Canterbury Regional Council | | CRC |
| **286** | S J B Munro Family Trust | | Munro Trust |
| **287** | P K M Farms Limited | | PKM Farms |
| **288** | Network Waitaki Limited | | Network Waitaki |
| **294** | Meridian Energy Limited | | Meridian |
| **302** | Peter and Sandra Mitchell | | P & S Mitchell |
| **305** | Erin Nivonne Schultz | | E Schultz |
| **306** | Waitaki Property Guardians Incorporated | | WPG 2 |
| **309** | Transpower New Zealand Limited | | Transpower |

**Table 2: Further Submitters Addressed in this Report**

| F Sub | Further Submitter Name | on Behalf of | Abbreviation |
|---|---|---|---|
| **FS168** | Kainga Ora - Homes and Communities | | KO |
| **FS262** | Ōtamatapaio Station Limited | | Ōtamatapaio Station |
| **FS108** | GM Kircher | | G Kircher |
| **FS111** | Ben Stratford | | B Stratford |
| **FS322** | Survey Waitaki Limited | | Survey Waitaki |
| **FS253** | Royal Forest & Bird Protection Society of New Zealand | | Forest & Bird |
| **FS297** | Parkside Holdings Ltd | | Parkside |
| **FS197** | PowerNet Limited | | PowerNet |
| **FS288** | Network Waitaki Limited | | Network Waitaki |

| F Sub | Further Submitter Name | on Behalf of | Abbreviation |
|---|---|---|---|
| **FS153** | National Hazards Commission Toka Tu Ake | | NHCTTA |
| **FS246** | Federated Farmers of New Zealand | | FFNZ |
| **FS195** | New Zealand Pork Industry Board | | NZ Pork |
| **FS152** | New Zealand Transport Agency | | NZTA |
| **FS259** | Otago Regional Council | | ORC |
| **FS306** | Waikati Property Guardians Incorporated | | WPGI |

# 2 Introduction

## 2.1 Experience and Qualifications

1. My full name is Briar Alayne Belgrave. I am a Partner at Barker & Associates, where I have worked for the past nine years. I have a Masters in Resource and Environmental Planning with Honours from Massey University and a Bachelor of Arts in Geography and Communications from Canterbury University. I am a full member of the New Zealand Planning Institute.

2. I have over 13 years' planning experience, which includes a range of position from graduate planner through to Partner across central government, local government, and private consultancy sectors in New Zealand and Australia. My experience includes policy and strategic planning, spatial planning, and central government policy development (including preparing and advising on National Policy Statements and National Environmental Standards and Resource Management Act Reforms), issues and options reporting for district plan reviews, district plan drafting, section 32 reports, section 42A reports and resource consent applications and assessments. My planning work has been undertaken throughout New Zealand, including in the Far North, Whangārei, Auckland, Waikato, Gisborne, Manawatū-Whanganui, New Plymouth, Wellington, West Coast, Waitaki and Southland. I have been involved in the Waitaki District Plan Review since 2019, initially preparing the Natural Hazards chapter provisions and section 32 report, before taking on a broader role drafting provisions and preparing section 32 reports across a range of topics and assisting with the integration of the District Plan following drafting.

3. Although this is a Council hearing, I confirm that I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note and that I have complied with it when preparing this report. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person. Having reviewed the submitters and further submitters relevant to this topic I advise there are no real or perceived conflicts of interest that would impede me from providing independent advice to the Hearings Panel.

## 2.2 Purpose and Scope of this Report

4. The purpose of this report is to provide the Hearing Panel with a summary and analysis of the submissions received on this topic, and to make recommendations in response to those submissions, to assist the Hearing Panel in evaluating and deciding on the submissions.

5. This report is prepared under s42A of the RMA in relation to Subdivision (SUB) in the PDP. It covers the following matters:

    - Part 2 – District Wide Matters/Subdivision, including:

- Subdivision objectives and policies;
- Subdivision rules relating to:
  - boundary adjustment
  - Subdivision creating cross lease title
  - Subdivision creating allotments for public works, infrastructure, reserves or access in all zones (except General Rural Zone)
  - creation of vacant allotments in all zones (except General Rural Zone, Open Space Zone and Sport and Recreation Zone)
  - Subdivision around existing lawfully established buildings
  - Subdivision in liquefaction assessment overlay
  - Subdivision creating a lot in the National Grid Substation Buffer
  - Subdivision creating an allotment within an Electricity Distribution Corridor
  - Subdivision creating an allotment within the National Grid Subdivision Corridor
  - Subdivision in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas
  - Subdivision of a site located fully or partially in the Moeraki Land Instability Overlay
  - Subdivision of a site located fully or partially in the Surface Fault Rupture Hazard Awareness Overlay
  - Subdivision of a site located fully or partially in the Future Urban Growth Overlay
- Subdivision standards including
  - Minimum allotment sizes and dimensions
  - Subdivision in the Otago Flood Assessment Overlay and Waitaki River Floodplain Assessment Overlay
  - Subdivision in the Canterbury Flood Assessment Overlay
  - Building platform
  - Access
  - Water supply
  - Water disposal
  - Stormwater management
  - Electricity and telecommunications
  - Esplanade reserves and esplanade strips

6. This report considers the submissions and further submissions that were received in relation to SUB. It includes recommendations to either retain provisions without amendment, or to delete, add to, or amend provisions in response to submissions. All recommended amendments are shown by way of ~~strikeout~~ and underlining in **Appendix 1** to this Report, or, in relation to mapping, through recommended spatial amendments to the mapping. Footnoted references to the relevant submitter(s) identify the scope for each recommended change. Recommended responses to each submission are given in **Appendix 2**.

7. Where changes are recommended, an evaluation has been undertaken in accordance with Section 32AA of the RMA.

8. The conclusions reached and recommendations made in this report are not binding on the Hearing Panel. It should not be assumed that the Hearing Panel will reach the same

conclusions having considered all the information in the submissions and the evidence to be brought before them by the submitters.

## 2.3 Submissions on Withdrawn PDP Provisions

9. On 15 January 2026, the Council withdrew aspects of the PDP that would no longer be progressed under the Plan Stop provisions in subpart 5B of the RMA. This included withdrawal of parts of the SUB chapter provisions including the following:

- Amendment to the SUB chapter Introduction to remove reference to historical, cultural, ecological, natural or landscape [overlays].
- Amendments to the SUB Chapter User Notes, to remove reference to Coastal Environment and vacant lot subdivision in an Outstanding Natural Feature and Landscape.
- Amendment of SUB-P11 to delete reference to SCHED5 – Sites of Significance to Māori, and change reference to "Coastal Environment" to "coastal environment".
- Amendment of SUB-P12 to delete reference to SCHED5 – Sites of Significance to Māori.
- Amendment of SUB-P16 to change the policy from "Rural Zones" to "Rural Lifestyle Zone" and deletion of clause 8.
- Amendment of SUB-R1 – SUB-R3, SUB-R6 – SUB-R9 to exclude General Rural Zone.
- Amendment of SUB-R4 to include controlled activity rule for General Rural Zone (as withdrawn).
- Amendment of SUB-R5 to remove reference to "relevant objective and policies in the Public Access Chapter" and deletion of General Rural Zone Rule.
- Deletion of SUB-R10, SUB-R11, SUB-R13 and SUB-R14.
- Amendment to SUB-R12, SUB-R15 – SUB-R18 to include reference to the withdrawn General Rural Zone.
- Amendment to SUB—S1 to delete clause e. General Rural Zone, f. Rural Scenic Landscape and Significant Natural Features and g. Outstanding Natural Landscapes.
- Amendment to SUB-S2 and SUB-S3 to include reference to the withdrawn General Rural Zone.
- Amendment to SUB-S4 Building platform, to delete references to SCHED6 Significant Natural Areas, Outstanding Natural Feature or Landscape, and the root protection area of a Notable Tree in SCHED 4 Notable Trees.
- Amendment of SUB-S5 SUB-S10 to exclude General Rural Zone.

10. Submissions that were made on aspects of the PDP that have since been withdrawn (or that seek relief relating to topics that have since been withdrawn) are no longer relevant to proceedings. Such submissions related to SUB have been identified by staff, are listed in **Appendix 3**, and are not considered further in this report. Please refer to the Hearing Panel Minute regarding scope matters.

11. It is possible that some submission points not identified in **Appendix 3** may still be wholly or partly outside the scope of the PDP. Any residual scope issues will be dealt with in the appropriate section of this report.

# 3 Topic Overview

## 3.1 Summary of Relevant Provisions of the PDP

12. This report relates to provisions associated with SUB. This section of the report provides a brief summary of the provisions relevant to this topic.

### 3.1.1 Subdivision Chapter

13. The SUB chapter applies district wide subdivision provisions which provide for subdivision within each zone or overlay, together with the provisions associated with necessary servicing, access and provision of esplanades. The chapter contains five objectives, 17 policies, 14 rules and 10 standards as follows:

- SUB-O1 Subdivision.
- SUB-O2 Subdivision design.
- SUB-O3 Infrastructure.
- SUB-O4 Subdivision and Regionally Significant Infrastructure.
- SUB-O5 Esplanade reserves and esplanade strips.
- SUB-P1 Creation of allotments.
- SUB-P2 Boundary adjustments and updates to existing cross-leases.
- SUB-P3 Provision of infrastructure.
- SUB-P4 Transport network.
- SUB-P5 Subdivision for network utilities.
- SUB-P6 Effects of subdivision on infrastructure.
- SUB-P7 Subdivision and the National Grid.
- SUB-P8 Subdivision in Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas.
- SUB-P9 Esplanade reserves and esplanade strips.
- SUB-P10 Esplanade reserves and esplanade strips – other waterbodies.
- SUB-P11 Reductions or waivers of esplanade reserves and esplanade strips.
- SUB-P12 Subdivision design.
- SUB-P13 Subdivision in Residential Zones.
- SUB-P14 Subdivision in Commercial Zones.
- SUB-P15 Subdivision in the Industrial Zones.
- SUB-P16 Subdivision in the Rural Lifestyle Zone.
- SUB-P17 Subdivision in the Settlement Zones.
- SUB-R1 Boundary adjustment.
- SUB-R2 Updating of a cross-lease title.
- SUB-R3 Subdivision of land solely to create an allotment for the purpose of public works, infrastructure, reserves or access.
- SUB-R4 Subdivision that creates any vacant allotment(s).

- SUB-R5 Subdivision of land around existing lawfully established buildings or buildings approved as part of a resource consent application where no vacant allotments are created.
- SUB-R6 Subdivision in the Liquefaction Assessment Overlay.
- SUB-R7 Subdivision creating a lot in the National Grid Substation Buffer.
- SUB-R8 Subdivision creating an allotment within an Electricity District Corridor.
- SUB-R9 Subdivision creating an allotment in the National Grid Subdivision Corridor.
- SUB-R12 Subdivision in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas.
- SUB-R15 Subdivision of a site located fully or partially in the Moeraki Land Instability Overlay – Low Risk or Low Risk Areas.
- SUB-R16 Subdivision of a site located fully or partially in the Surface Fault Rupture Hazard Awareness Overlay – Subdivision.
- SUB-R17 Subdivision of a site located fully or partially in the Future Urban Growth Overlay.
- SUB-R18 Subdivision of a site located full or partially within the Moeraki Land Instability Overlay – High Risk and Very High Risk Areas.
- SUB-S1 Minimum allotment sizes and dimensions.
- SUB-S2 Subdivision in the Otago Flood Assessment Overlay and Waitaki River Floodplain Assessment Overlay.
- SUB-S3 Subdivision in the Canterbury Flood Assessment Overlay.
- SUB-S4 Building platform.
- SUB-S5 Access.
- SUB-S6 Water Supply.
- SUB-S7 Wastewater Disposal.
- SUB-S8 Stormwater Management.
- SUB-S9 Electricity and telecommunications.

14. These provisions seek to manage the subdivision of land, the process of dividing a site or building into one or more additional sites or units and changing the location of an existing boundary. The ability to subdivide is managed relative to the zone and overlay outcomes and constraints. The provisions include standards to manage future development, access and servicing.

15. The rules and standards establish a hierarchy of activity status and performance standards that manage the design of subdivision while providing an appropriate level of assessment where standards cannot be met.

## 3.2 Background to Relevant Provisions

16. Chapter 8 of the ODP contains objectives, policies relating to subdivision, development and financial contributions. Whilst chapter 14 contains rules relating to subdivision, development and financial contributions. These provisions provide a framework of service provision for subdivision in anticipation of the likely effects of land use activities, including roading, water supply, sewage disposal, energy, telecommunication,

stormwater and trade waste. Subdivision provisions are also the mechanism for the provision of esplanade reserves, and esplanade strips and access strips, and is therefore significant in the context of providing public access to waterways and the coastline.

17. While the ODP provides a framework for managing subdivision effects, it pre-dates more recent approaches to integrated subdivision design and there is limited guidance around design and sustainable development patterns. The provisions do not address, fragmentation of highly productive land, low impact design and containing urban growth, or ensuring subdivision is carried out in a coordinated manner.

18. Since the notification of the PDP, there have been changes to the national planning framework relevant to the SUB chapter, including the NPS-I and NPS-EN which came into force on 15 January 2026. The SUB provisions must give effect to the NPS-I where relevant.

# 4 Overview of Submissions

19. The full list of submission points addressed in this report is set out in **Appendix 2**. Overall, 276 original submission points and 39 further submission points are addressed.

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

**Table 3: Summary of Key Issues Raised in Submissions**

| Issue Name | Summary of Issue | Position of Submitters |
|---|---|---|
| **General Subdivision** | General support, amendment or opposition to the SUB chapter, including the chapter introduction, overall subdivision framework, relationship with other chapters, and implementation of the SUB provisions. | 1 submission point supports the general SUB framework. 12 submission points seek amendments. |
| **SUB Objectives** | General support, amendment or opposition to the SUB chapter objectives | 27 submission points support the objectives. 26 submission points seek amendments. 1 submission point opposes an objective or part of an objective. |
| **SUB Policies** | General support, amendment or opposition to the SUB chapter policies | 43 submission points support the policies. 55 submission points seek amendments. 6 submission points oppose policies or parts of policies. |
| **SUB Rules** | General support, amendment or opposition to the SUB chapter rules | 25 submission points support the rules. 21 submission points seek amendments. 4 submission points oppose rules or parts of rules. |

| Issue Name | Summary of Issue | Position of Submitters |
|---|---|---|
| **SUB Standards** | General support, amendment or opposition to the SUB chapter standards | 17 submission points support the standards. 30 submission points seek amendments. 8 submission points oppose standards or parts of standards. |

# 5 Relevant Statutory Provisions

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

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

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

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

# 6 Statutory Instruments

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

## 6.1 Resource Management Act 1991

24. Relevant to the topic of Infrastructure are the following sections of the RMA:

- Section 6 (a), (b), (c), (d), (e), (f) and (h).
- Section 7(b), (c), (d), (f), (g) and (i).
- Section 8.

25. The SUB chapter does not directly address any matters of national importance identified in section 6 of the RMA. However, the above section 6 matters are relevant to the SUB chapter as the subdivision of land to facilitate additional development rights and the design and layout of subdivision have the potential to create adverse effects in relation to the matters identified above.

26. The above referenced section 7 matters are most relevant to the SUB chapter:

- Urban and rural land is a finite resource and therefore it is important that it is developed in a manner that is efficient.
- The subdivision of land, including its design and layout, has the potential to affect amenity values.
- The subdivision of land may facilitate additional development rights which have the potential to affect ecosystems.
- The subdivision of land to facilitate additional development rights and the design and layout of subdivision has the potential to affect the quality of the environment. This includes whether new sites are of a size or shape that can accommodate the anticipated land use within the underlying zone.
- Provisions for public access along waterbodies will also enhance amenity values through enabling improved public accessibility to natural and open spaces.
- The subdivision of land may facilitate additional development rights, including in locations that may be vulnerable to the effects of climate change, for example flooding events or in coastal locations. New development also has the potential to exacerbate existing hazard risks.

27. These matters are reflected in the chapter's approach to enabling subdivision which ensures efficient use and development of land and supporting infrastructure whilst recognising the potential to affect the quality of the environment.

28. Section 8 requires the Council to take into account the principles of Te Tiriti o Waitangi / the Treaty of Waitangi in exercising its functions and powers under the RMA. The SUB chapter has been developed having regard to those principles, while recognising that transport infrastructure and transport-related activities may intersect with matters of importance to mana whenua that are addressed elsewhere in the Proposed District Plan.

29. The following sections of the RMA are relevant to the SUB chapter:

- Under section 11 of the RMA, no person may subdivide land unless the subdivision is:
    - Expressly allowed by a NES, a rule in a district plan or a resource consent, or
    - Created under the Public Works Act, or
    - Associated with a reserve under Te Ture Whenua Māori Act, or
    - Effected by a transfer under the State-Owned Enterprises Act, or
    - Effected by the vesting or transfer of land under the Conservation Act, or
    - Effected by the transfer or gift of land under the Heritage New Zealand Pouhere Taonga Act or Queen Elizabeth the Second National Trust Act, or
    - Effected by particular actions under the Property Law Act. The partitioning of Māori land held under Te Ture Whenua Māori Act is exempt from section 11 and must be undertaken through the Māori Land Court.

- Under section 106 of the RMA, a consent authority may refuse subdivision consent, or grant a subdivision consent subject to conditions, if it considers that:
    - There is a significant risk from natural hazards,
    - Sufficient provision has been made for legal and physical access to each allotment to be created by the subdivision.
- Under section 230 of the RMA, where an allotment of less than 4 hectares is created when land is subdivided, a 20m esplanade reserve is required to be set aside from that allotment along the mark of mean high water springs of the sea, and along the bank of any river whose bed has an average width of 3m or more. A district plan provision may reduce the width of the required esplanade reserve.

## 6.2 Te Tiriti o Waitangi

30. All persons acting under the RMA (including applicants, councils and takata whenua) must take into account the principles of the Te Tiriti o Waitangi (s8). Similar obligations are imposed on councils under the Local Government Act 2022 (LGA).

### 6.2.1 Iwi Management Plans

#### 6.2.1.1 Kāi Tahu ki Otago Natural Resource Management Plan 2005

31. KTKO NRMP is the principal planning document of the four papatipu rūnaka that form Kāi Tahu ki Otago. The KTKO NRMP provides information, direction and a framework to promote understanding of the resource values, concerns and issues of Kāi Tahu ki Otago. Of particular relevance to the SUB chapter, the Plan contains specific policies relating to subdivision within its cultural landscapes provisions. These seek a holistic approach to subdivision which recognises and protects Kāi Tahu cultural values and considers matters including visual amenity, water requirements, wastewater and stormwater disposal, landscaping and the location of building platforms. The policies also address subdivision within culturally significant landscapes, earthworks and accidental discoveries, proximity to sites of significance, and public access along lakeshores and riverbanks.

32. I consider these matters are reflected in the SUB chapter through its integrated approach to subdivision design, infrastructure and servicing, and the provision of esplanade reserves and strips. In particular, the SUB provisions manage access and servicing as integral components of subdivision and the recommended amendments to SUB-O5 expressly recognise natural character and access to mahika kai as outcomes associated with esplanade reserves and strips. Other cultural landscape, wāhi tapu and archaeological matters are addressed through the relevant District-wide provisions of the PDP and do not need to be duplicated within the SUB chapter.

#### 6.2.1.2 Waitaki Iwi Management Plan 2019

33. The WIMP represents the planning document of Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki and provides direction for the exercise of rakatirataka and kaitiakitaka within the Waitaki catchment. Of particular relevance to subdivision, the Plan seeks the protection and enhancement of wāhi tūpuna and cultural landscapes and

their constituent values, including mahika kai, kāika nohoaka, ara tawhito and access to these places. It also identifies the potential for activities enabled through district plans to adversely affect cultural landscapes and seeks appropriate recognition and protection of these values through district planning processes.

34. These matters are relevant to the SUB chapter because subdivision can establish enduring patterns of land ownership, development, access and servicing. In particular, the Waitaki Iwi Management Plan direction is relevant to the provision and design of esplanade reserves and strips and their role in maintaining access to waterbodies and mahika kai. I consider this direction is appropriately reflected in the SUB framework, including the recommended amendments to SUB-O5 and SUB-P10 to expressly recognise natural character and access to mahika kai as relevant outcomes and considerations for esplanade provision. The wider PDP provisions relating to wāhi tūpuna and other cultural values will also apply where relevant, avoiding the need to duplicate those provisions within the SUB chapter.

## 6.3 National Policy Direction for Infrastructure 2025

35. Since notification of the PDP, the National Policy Statement for Infrastructure 2025 (NPS-I) has been released and came into force on 15 January 2026 with relevance to the SUB chapter.

36. The NPS-I recognises the importance of infrastructure, including electricity transmission and distribution infrastructure, in supporting the social, economic, cultural and environmental wellbeing of communities and requires district plans to provide for its operation, maintenance, renewal, upgrading and development while appropriately managing adverse effects. The notified SUB chapter is generally consistent with the direction of the NPS-I ensuring the appropriate servicing of subdivision.

## 6.4 National Policy Statement for Electricity Networks 2008 (Amended 2025)

37. The National Policy Statement for Electricity Transmission 2008 (NPS-ET) recognised the national significance of the electricity transmission network including the National Grid. The PDP as notified gave effect to the NPS-ET.

38. The NPSET was amended in 2025 being renamed National Policy Statement for Electricity Networks 2008 (amended 2025) (NPS-EN) coming into force on 15 January 2026. The NPS-EN applies to electricity network activities, including all electricity transmission and distribution networks and ancillary electricity network activities. The SUB chapter includes provisions which manage subdivision in proximity to National Transmission Lines (National Grid) and Electricity Distribution Lines.

## 6.5 National Policy Statement on Urban Development 2020

39. The National Policy Statement on Urban Development 2020 (NPS-UD) seeks to ensure that New Zealand's towns and cities are 'well-functioning urban environments' that meet

the changing needs of our diverse communities. The NPS-UD sets out the following direction which is relevant to the SUB chapter:

- Objective 1 and Policy 1 seek to create well-functioning urban environments.
- Policy 5 requires that district plans applying to Tier 3 urban environments enable heights and densities of urban form commensurate with the greater of:
  a) The level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or
  b) Relative demand for housing and business use in that location.

40. As a Tier 3 Council, it is important that the provisions of the SUB chapter support and enable increased density in urban environments with higher levels of accessibility and/or demand.

## 6.6 National Policy Statement on Highly Productive Land 2022

41. The National Policy Statement on Highly Productive Land 2022 (NPS-HPL) seeks to protect and ensure the availability of New Zealand's highly productive land for land-based primary production, both now and for future generations. The NPS-HPL provides a stringent protection regime and sets out the following direction which is relevant to the SUB chapter:

- Policy 7: The subdivision of highly productive land is avoided, except as provided in the National Policy Statement.
- Policy 9: Reverse sensitivity effects are managed so as not to constrain land-based primary production activities on highly productive land.

42. To give effect to the NPS-HPL, it is important that the provisions of the SUB chapter manage the subdivision and fragmentation of highly productive land. Noting that the General Rural Zone subdivision provisions have been withdrawn.

## 6.7 National Policy Statement on Indigenous Biodiversity 2023

43. The National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB) directs councils to establish consistent approaches in their policies, plans and strategies to maintain indigenous biodiversity. The NPS-IB provides direction to councils on how to identify, maintain and protect our indigenous biodiversity with the general purpose of ensuring there is 'no net loss overall'.

44. The NPS-IB is relevant to the SUB chapter as subdivision and the creation of new sites and development rights have the potential to affect Significant Natural Areas (SNA) and biodiversity values. It is noted that certain activities are not covered under the provisions of the NPS-IB. These include established activities, some significant national or regional infrastructure including transport infrastructure, renewable electricity and electricity transmission assets and activities related to non-indigenous species or ecosystems.

## 6.8 Canterbury Regional Policy Statement 2013

45. The following objectives of the Canterbury RPS are relevant:

- Objective 5.2.1 Location, design and function of development: Development is located and designed so that it functions in a way that, among other matters:
    - Achieves consolidated, well designed and sustainable growth in and around existing urban areas as the primary focus for accommodating the region's growth;
    - Maintains, and where appropriate, enhances the overall quality of the natural environment of the Canterbury region, including its coastal environment, outstanding natural features and landscapes, and natural values; and
    - avoids adverse effects on significant natural and physical resources including regionally significant infrastructure, and where avoidance is impracticable, remedies or mitigates those effects on those resources and infrastructure.
- Objective 5.2.2 Integration of land-use and regionally significant infrastructure:
    - In relation to the integration of land use and regionally significant infrastructure, achieve patterns and sequencing of land-use with regionally significant infrastructure so that development does not result in adverse effects on the operational, use and development of regionally significant infrastructure and there is increased sustainability, efficiency, and liveability.
- Objective 11.2.1: Avoid new subdivision, use and development of land that increases risks associated with natural hazards.
- Objective 11.2.3: The effects of climate change, and its influence on sea levels and the frequency and severity of natural hazards, are recognised and provided for.

## 6.9 Otago Regional Policy Statement 2021

46. The following objectives and policies of the Otago RPS are particularly relevant:

- LF-LS-O11 *Land* and soil: The availability and *productive capacity* of *highly productive land* for *primary production* is protected from inappropriate use and development now and for future generations.
- LF-LS-O12 Use, development, and protection: The use, development, and protection of *land* and soil:
    - safeguards the life-supporting capacity of soil,
    - sustains the potential of *land* and soil to meet the reasonably foreseeable needs of future generations while recognising the extractive nature of mining,
    - contributes to achieving *environmental outcomes* for *fresh water*, and
    - recognises the role of these resources in providing for the social, economic, and cultural well-being of Otago's people and communities.
- UFD-O1 Development of *urban areas*: The development and change of Otago's *urban areas* occurs in a strategic and coordinated way, which results in *well-functioning urban environments,* that:

  1. accommodate the diverse and changing needs and preferences of Otago's people and communities, now and in the future,

2. integrate effectively with *infrastructure, development infrastructure* and *additional infrastructure,* and surrounding *urban areas* and *rural areas*, including by managing *reverse sensitivity effects* and direct *effects* on electricity networks,

3. are consolidated, well-connected and have a well-designed urban form,

4. have effective and efficient *infrastructure, development infrastructure* and *additional infrastructure,*

5. support *climate change adaptation* and *climate change mitigation,* and

6. takes into account the values and aspirations of iwi, hapū and whānau, including for urban development.

- UFD-P1 – Strategic planning
  Strategic planning processes, undertaken at an appropriate scale and detail, precede urban growth and development and:

  1. identify how housing choice, quality, and affordability will be improved,

  2. ensure the integration of *land* use, urban intensification, and urban expansion with *infrastructure,* including how, where and when necessary *development infrastructure* and *additional infrastructure* will be provided, and by whom,

  6. indicate how connectivity will be improved and connections will be provided within *urban areas,*

- UFD-P2 – Sufficiency of *development capacity*
  Ensure that at least sufficient housing and business *development capacity* is provided in *urban areas* in the short, medium and long term, including by:

  1. responding to any demonstrated insufficiency in housing or business *development capacity* by increasing *development capacity* or providing more *development infrastructure* as required, as soon as practicable.

- UFD-P3 – Urban intensification

  Manage intensification in *urban areas,* so that as a minimum the intensification:

  1. contributes to establishing or maintaining the qualities of a *well-functioning urban environment,*
  2. is well-served by efficient and effective *infrastructure, development infrastructure* and *additional infrastructure,*

- UFD-P4 – Urban expansion

  Expansion of existing *urban areas* should only occur where, at a minimum, the expansion:

  3. achieves consolidated, well designed and sustainable development in and around existing *urban areas,*
  5. is integrated efficiently and effectively with *infrastructure, development infrastructure* and *additional infrastructure* in a strategic, timely and co-ordinated way,

- HAZ-NH-O1:*Natural hazards*: Activities do not exacerbate *natural hazard* risks within Otago, and are managed to reduce significant *natural hazard* risk.

- HAZ-NH-O2: Adaptation: Otago's people, communities, property, and other aspects of the *environment* are prepared for and able to adapt to the *effects of natural hazards,* including *natural hazard* risks that are exacerbated by *climate change*.

## 6.10 National Adaption Plan

47. The RMA already requires significant risks from natural hazards and the effects of climate change to be considered and prioritised. The NAP provides more specific context for how these matters can be considered.

48. It is considered that regard has been had to the goals of the NAP which include reducing vulnerability to the impacts of climate change and strengthening resilience of the way people and systems cope with climate impacts. Regard has also been had to the priorities of the NAP, including driving climate-resilient development in the right locations. At a high-level, Council's need to avoid locking in inappropriate land use and blocking any adaptation pathways. In particular, the relevant objectives in the SUB chapter require subdivision to provide for the health and well-being of communities and recognise the role of esplanade reserves and strips created through the subdivision process in contributing to hazard management.

## 6.11 Emissions Reduction Programme

49. Planning decisions can have long-term consequences for the emissions created, so they can be a powerful tool to reduce emissions. Plans developed under the RMA should consider how they can support the actions and outcomes in the emissions reduction plan.

50. ERP2 has a number of principles and policies. Of particular relevance, ERP2 recognises the role of the urban environment in reducing emissions through providing modal choice for travel and through the efficient use of infrastructure integration eith housing and land-use planning to reduce operational emissions per dwelling.

51. These actions are reflected in SD-UFD-O1 Integrated management and SD-UFD-O6 Urban growth, as well as the SUB chapter through SUB-O2, which seeks subdivision to be designed to consolidate urban development and avoid sprawl, and to provide a safe and accessible layout. It is considered that the outcomes within these objectives are in keeping with urban environments which contribute to supporting a reduction in emissions.

# 7 Evaluation of Submissions

## 7.1 Approach to Evaluation

52. Submissions addressed under the infrastructure topic address provisions across the PDP and assessment has been undertaken on a topic by topic, provision by provision basis that generally aligns with provisions as outlined under the summary of key issues raised (Table 3) and follows the order of the SUB Chapter:

- Subdivision general submissions
- SUB chapter objectives
- SUB chapter policies
- SUB chapter rules
- SUB chapter standards

53. Where multiple submission points seek the same relief, those points will be grouped by theme.

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

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

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

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

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

58. Where a further submission supports a primary submission and the primary submission is recommended to be accepted, or where a further submission opposes a primary submission and the primary submission is recommended to be rejected, the further submission is recommended to be accepted.

59. Where a further submission supports a primary submission and the primary submission is recommended to be rejected, or where a further submission opposes a primary submission and the primary submission recommended to be accepted, the further submission is recommended to be rejected.

## 7.2 Provisions where No Change is Sought

60. The following provisions included within SUB chapter were either not submitted on, or any submissions received sought their retention. As such, they are not assessed further in this report, and I recommend that the provisions are retained as notified (unless a cl 16(2) change is recommended):

- SUB-R15
- SUB-S2

## 7.3 Subdivision – General

61. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, 13 original submission points and five further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **K Culp** | 122.3, 122.1 |
| **B de Geest** | 51.36 |
| **C Prunty** | 96.4 |
| **J White 2** | 106.1 |
| **Hort NZ** | 166.91 |
| **DOC** | 194.71 |
| **FFNZ** | 246.203 and 246.204 |
| **Munro Trust** | 286.7, 286.8 |
| **C Leckie 2** | 107.6 |
| **ORC** | 259.75 |
| **Further Submitter Name** | **Further Submission Point Number(s)** |
| **KO** | FS168 |
| **OSL** | FS262 |
| **G Kircher** | FS108 |
| **B Stratford** | FS111 |

### 7.3.1 Submissions

62. DOC [194.71] supports the SUB chapter in part, considering the provisions generally provide an appropriate level of control for subdivision, and seeks retention except where specific amendments are requested.

63. B de Geest [51.36] seeks amendments to provide greater transparency and certainty for financial contributions.

64. C Prunty [96.4] seeks amendments to remove public notification preclusion from the SUB chapter, so design and layout matters can be fully scrutinised through the consent process.

65. J White 2 [106.1] and FFNZ [246.204] seek stronger policy direction in the SUB chapter to support the rules. J White seeks objectives and policies for subdivision in flood hazard areas, liquefaction areas and Moeraki High Risk Areas, while FFNZ seeks clearer policy guidance for applicants and decision-makers. FFNZ [246.203] supports the SUB chapter

introduction in part, seeking clearer explanation of the SUB chapter's purpose. FFNZ want the introduction to identify the specific resource-management issues the SUB provisions address and consider that stronger policy direction is needed to justify the SASM rules. Noting in the General Rural Zone, key issues include fragmentation of highly productive land, loss of land used for primary production, and reverse-sensitivity effects from nearby residential or urban activities.

66. K Culp [122.3, 122.1] seeks more flexible rural subdivision provisions and for the Subdivision chapter to emulate Waimate District Plan provisions for clustered growth around towns with reticulated infrastructure, to support sustainable and cost-effective expansion.

67. Hort NZ [166.91] seeks provisions enabling transferable titles or subdivision rights to avoid the loss and fragmentation of highly productive land.

68. Munro Trust [286.7, 286.8] seeks reduced or minimum allotment sizes for a specified site or similar sites in the General Rural Zone/Rural Scenic Overlay, or restricted discretionary activity status with matters addressing site-specific constraints on reasonable use.

69. C Leckie 2 [107.6] seeks amendments to SUB-O3 to provide a more flexible approach to infrastructure servicing for business and industrial subdivision.

70. ORC [259.75] supports the inclusion of user notes in the SUB chapter and seeks to retain as notified.

### 7.3.2 Analysis

71. I acknowledge the general support from DOC [194.71] and ORC [259.75]. I consider the notified SUB chapter provides an appropriate framework for managing the effects of subdivision, including through objectives and policies addressing subdivision design, infrastructure, regionally significant infrastructure and esplanade provision. Specific amendments sought by DOC are addressed in the relevant sections of this report.

72. In relation to B de Geest [51.36], the SUB chapter primarily manages the environmental effects and servicing requirements associated with subdivision. I do not consider that amendments to the chapter are necessary to provide additional direction regarding financial contributions.

73. In relation to C Prunty [96.4], I do not consider that public notification is necessary in every circumstance to appropriately assess subdivision design and layout. The notified framework applies notification preclusions to specific rules rather than subdivision generally, and relevant effects can still be assessed through the resource consent process.

74. I acknowledge the concerns raised by J White 2 [106.1] and FFNZ [246.204] regarding policy direction. However, the notified chapter already contains objectives and policies addressing subdivision design and infrastructure. The chapter introduction expressly identifies that objectives and policies relating to subdivision within natural hazard and other overlays are contained in the corresponding District-wide chapters. I consider this approach appropriately avoids unnecessary duplication between chapters. In respect to

FFNZ [246.03] I note that the SASM and General Rural Zone provisions were withdrawn from the PDP and the provisions of the ODP must be applied. Therefore, I do not consider is necessary or appropriate to specifically reference these matters within the SUB chapter introduction.

75. In relation to K Culp [122.3, 122.1], I acknowledge that concentrating development where reticulated infrastructure is available may provide efficiencies. However, I consider the notified provisions provide an appropriate framework for managing subdivision having regard to the intended character, function and development pattern of the relevant zones. I am not persuaded that a different subdivision framework modelled on another district plan would be more appropriate for the Waitaki District.

76. I agree with Hort NZ [166.91] regarding the importance of avoiding inappropriate fragmentation of highly productive land. However, I am not persuaded that transferable subdivision rights (TDRs) are necessary to achieve this outcome. SUB-O2 seeks to maintain or enhance the productive capacity of highly productive land, while SUB-P16 specifically addresses the fragmentation of land in the General Rural Zone.

77. In relation to Munro Trust [286.7, 286.8], I consider that minimum allotment sizes form part of the broader approach to managing subdivision and maintaining rural character and productive capacity. I do not consider that site-specific constraints provide sufficient justification for establishing a different subdivision framework for an individual property or an undefined class of similar properties.

78. In relation to C Leckie 2 [107.6], SUB-O3 requires infrastructure to have sufficient capacity and to be planned or provided in an integrated manner. I consider the objective provides appropriate direction while retaining sufficient flexibility for each particular servicing solution to respond to the circumstances of the subdivision.

### 7.3.3 Recommendations

79. I recommend no changes to the SUB chapter in response to these submission points.

## 7.4 Subdivision – SUB-O1

80. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in Appendix 2. Overall, 18 original submission points and two further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **M McKenzie** | 149.4 |
| **DOC** | 194.72 |
| **FFNZ** | 246.205 |
| **Forest & Bird** | 253.135, 253.136 |
| **CRC** | 271.388 |
| **E Schultz** | 305.138 |

| Submitter Name | Submission Point Number(s) |
|---|---|
| **WPG 2** | 306.138 |
| **BA Thomson** | 183.44 |
| **BA & GJ Paton** | 270.42 |
| **C & C Harvey** | 273.59 |
| **GA & MA Farmer** | 274.59 |
| **M & N Hay** | 275.45 |
| **PR & JP Winders** | 276.45 |
| **A & JJ Hales** | 277.45 |
| **C Willetts & C Anderson** | 278.45 |
| **PJ Rutledge** | 279.59 |
| **AG & EM King** | 307.43 |
| **Further Submitter Name** | **Further Submission Point Number(s)** |
| **Survey Waitaki Ltd** | FS322 |
| **Forest & Bird** | FS253 |

### 7.4.1 Submissions

81. DOC [194.72], CRC [271.388], E Schultz [305.138] and WPG 2 [306.138] support SUB-O1 and seek that the objective be retained as notified.

82. M McKenzie [149.4] supports SUB-O1 in part but seeks an amendment requiring all affected parties to be notified where a right-of-way is involved.

83. FFNZ [246.205] supports SUB-O1 in part but considers subdivision does not affect overlays and seeks deletion of the requirement that subdivision achieves overlay objectives.

84. Forest & Bird [253.135, 253.136] supports SUB-O1 in part but seeks amendments requiring subdivision to achieve both the objectives and policies of overlays.

85. BA Thomson [183.44], BA & GJ Paton [270.42], C & C Harvey [273.59], GA & MA Farmer [274.59], M & N Hay [275.45], PR & JP Winders [276.45], A & JJ Hales [277.45], C Willetts & C Anderson [278.45], PJ Rutledge [279.59] and AG & EM King [307.43] all consider it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. These submitters seek to amend SUB-O1 as follows:

    Subdivision creates allotments and patterns of land development that are compatible with the purpose, character and qualities of each zone and achieve the objectives of overlays (except in relation to any land which is scheduled wāhi tūpuna in SCHED5 – Sites

and Areas of Significance to Māori, where the land is privately owned or residentially or rurally zoned).

### 7.4.2 Analysis

86. Support of DOC [194.72], CRC [271.388], E Schultz [305.138] and WPG 2 [306.138] for SUB-O1 as notified is recognised.

87. In my opinion notification triggers (if necessary) are more appropriately provided for within a rule as an implementation method to give effect to an objective rather than being contained within and objective. As such I acknowledge the support of M McKenzie [149.4] for SUB-O1 but do not consider it is appropriate to amend the objective to require notification.

88. Whilst I consider that subdivision can result in a number of effects to overlays depending upon the relevant overlay and the nature of the subdivision, I agree with FFNZ [246.205] that it is unnecessary duplication and adds complexity to SUB-O1 to cross reference all objectives in any overlay. I expect that Overlay provisions would be considered in their own right without the need to include cross references in SUB-O1. On this basis I do not support the amendment to SUB-O1 as requested by Forest & Bird [253.135, 253.136]. Furthermore, I note that SUB policies include appropriate references to relevant overlays without the need to include a cross reference in SUB-O1.

89. I acknowledge the concerns raised by BA Thomson [183.44], BA & GJ Paton [270.42], C & C Harvey [273.59], GA & MA Farmer [274.59], M & N Hay [275.45], PR & JP Winders [276.45], A & JJ Hales [277.45], C Willetts & C Anderson [278.45], PJ Rutledge [279.59] and AG & EM King [307.43] regarding the application of wāhi tūpuna provisions to privately owned land. However, I do not consider that private ownership, or residential or rural zoning, would in itself provide a basis for excluding land from provisions managing identified cultural values. Such provisions do not alter land ownership or confer ownership, governance or access rights on Kāi Tahu or mana whenua; rather, they provide a resource management framework for considering identified values where subdivision, use or development is proposed.

90. In any event, the relief sought is no longer necessary because SCHED5 – Sites and Areas of Significance to Māori is being deleted from the PDP. Consequentially, references to SCHED5 within the SUB chapter are also being removed, including from SUB-P11 and SUB-P12. In addition, as discussed above in relation to FFNZ [246.205], I recommend deleting from SUB-O1 the requirement that subdivision "achieve the objectives of overlays", because the relevant overlay provisions are appropriately considered through their respective chapters rather than duplicated in SUB-O1. Accordingly, I do not consider the specific exemption sought by these submitters is necessary and recommend rejecting the relief sought.

### 7.4.3 Recommendations

91. I recommend that SUB-O1 be amended as follows:

SUB-O1 Subdivision

Subdivision creates allotments and patterns of land development that are compatible with the purpose, character and qualities of each zone ~~and achieve the objectives of overlays~~.

### 7.4.4 Evaluation

92. I consider the recommended amendment to SUB-O1 improves the clarity and effectiveness of the objective by removing unnecessary duplication with the Overlay provisions. The amendment does not alter the intended management of subdivision within overlays, which will continue to be addressed through the relevant Overlay provisions and SUB policies. I consider the amendment will provide a minor efficiency benefit through a clearer and more concise objective, with no material environmental, economic, social or cultural costs. The amendment is therefore considered to be the most appropriate way to achieve the purpose of the RMA.

## 7.5 Subdivision – SUB-O2

93. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, 13 original submission points and five further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **M McKenzie** | 149.5 |
| **FENZ 2** | 163.43 |
| **NPHS** | 164.4 |
| **Hort NZ** | 166.37 |
| **DOC** | 194.73 |
| **NZ Pork** | 195.26 |
| **MOED** | 242.27 |
| **FFNZ** | 246.206 |
| **Forest & Bird** | 253.137 |
| **CRC** | 271.389 |
| **E Schultz** | 305.139 |
| **WPG 2** | 305.139 |
| **Shelton Downs Station** | 193.11 |
| **Further Submitter Name** | **Further Submission Point Number(s)** |
| **Forest & Bird** | FS253 |
| **KO** | FS168 |
| **Parkside** | FS297 |
| **PowerNet** | FS197 |
| **Network Waitaki** | FS288 |

### 7.5.1 Submissions

94. Support of FENZ 2 [163.43], NPHS [164.4], CRC [271.389], E Schultz [305.139] and WPG 2 [305.139] for SUB-O2 as notified is acknowledged.

95. M McKenzie [149.5] supports SUB-O2 in part but seeks an amendment requiring all affected parties to be notified where a right-of-way is involved.

96. DOC [194.73] supports SUB-O2 in part, considering it too anthropocentric and should recognise natural values in subdivision design. DOC seeks an additional clause requiring subdivision to reflect and respond to the natural values of the site and surrounding areas.

97. Hort NZ [166.37] and NZ Pork [195.26] seek amendments to SUB-O2 to require reverse sensitivity effects of subdivision on permitted and existing lawfully established activities to be avoided or mitigated.

98. MOED [242.27] supports SUB-O2 in principle but seeks more explicit recognition of educational facilities. MOED seeks an additional clause requiring growth and development to be supported by educational facilities.

99. FFNZ [246.206] supports SUB-O2 in part but seeks clearer direction on rural character, reverse sensitivity, rural land fragmentation and highly productive land. FFNZ seeks amendments to manage reverse sensitivity, protect productive capacity, and avoid or minimise fragmentation and loss of rural productive potential.

100. Forest & Bird [253.137] opposes SUB-O2 in part and seeks amendments requiring subdivision to integrate with the natural environment, increase indigenous vegetation cover and restore or enhance indigenous biodiversity.

101. Shelton Downs Station [193.11] considers that subdivision, and the associated land use development that subdivision entails, as an objective, applies in an ONL and request that the following clause be added to SUB-O2:

    Protects or enhances Outstanding Natural Features and Landscapes values; and

### 7.5.2 Analysis

102. Support of FENZ 2 [163.43], NPHS [164.4], CRC [271.389], E Schultz [305.139] and WPG 2 [305.139] for SUB-O2 as notified is acknowledged.

103. In relation to M McKenzie [149.5], I do not consider notification requirements are appropriately included within an objective. SUB-O2 establishes the outcomes sought from the design and pattern of subdivision, while any notification requirements are more appropriately addressed through the applicable rules and the statutory notification process under the RMA.

104. I acknowledge DOC's [194.73] concern that natural values should be appropriately considered in subdivision design. However, SUB-O2 already requires subdivision to reflect and respond to the physical characteristics and constraints of the site, while the chapter expressly recognises that subdivision within natural, ecological and landscape overlays is also subject to the objectives and policies of the relevant District-wide

chapters. I consider those provisions provide the appropriate framework for managing identified natural values, without needing to duplicate this direction within SUB-O2.

105. I acknowledge the concerns of Hort NZ [166.37] and NZ Pork [195.26] regarding reverse sensitivity effects. However, I consider the notified objective already provides appropriate strategic direction by requiring subdivision to respond to the character and amenity values of the surrounding area and to maintain rural character in rural areas. More specific management of reverse sensitivity is appropriately addressed at the policy and rule level, rather than adding detailed effects-management direction to SUB-O2.

106. In relation to MOED [242.27], I agree that the availability of educational facilities can be an important consideration in supporting growth and development. However, SUB-O2 is concerned with the outcomes sought from subdivision design rather than requiring the provision of particular community facilities. I do not consider it necessary nor appropriate for the objective to specifically identify educational facilities.

107. I acknowledge the matters raised by FFNZ [246.206]. However, SUB-O2 already requires subdivision to maintain rural character in rural areas, avoid settlement sprawl, and maintain or enhance the productive capacity of highly productive land. More detailed direction concerning rural subdivision and fragmentation is provided through the subsequent policies, including SUB-P16. I consider this hierarchy provides clearer and more effective direction than incorporating further detailed requirements within SUB-O2.

108. Similarly, I acknowledge the outcomes sought by Forest & Bird [253.137] for indigenous biodiversity and the natural environment. However, I consider these matters are more appropriately addressed through the PDP provisions specifically managing indigenous biodiversity and other identified natural values. Requiring all subdivision through SUB-O2 to increase indigenous vegetation cover or restore or enhance indigenous biodiversity would also apply irrespective of the nature, scale or location of the subdivision. I do not consider that such a broad requirement is appropriate within the overarching subdivision design objective.

109. I acknowledge Shelton Downs Station [193.11] considers that SUB-O2 should recognise that subdivision may occur within Outstanding Natural Landscapes (ONLs), subject to appropriate protection of landscape values. I agree that subdivision can establish enduring patterns of land ownership and future development which may affect identified landscape and other overlay values.

110. However, rather than referring specifically to ONLs, I consider it more appropriate and consistent with the structure of the PDP to provide broader direction requiring subdivision to protect the values identified by relevant overlays. This avoids creating specific direction for one overlay within the general subdivision objective and ensures the provision remains applicable to overlays retained or introduced through the PDP process, including ONLs where these are included within the Plan. I therefore recommend accepting Shelton Downs [193.11] in part and amending SUB-O2 to require subdivision to protect the values identified by relevant overlays.

### 7.5.3 Recommendations

111. I recommend the following change to SUB-O2 as follows:

SUB-O2 Subdivision Design

Subdivision occurs in a sequenced and coherent manner and is designed so that it:

1. reflects and responds to:
   a. the physical characteristics and constraints of the site; and
   b. considerations for passive solar gain for dwellings in the subdivision; and
   c. the character and amenity values of the surrounding area; and
2. is accessible and is connected to and integrated with existing communities and the transport network; and
3. consolidates urban development; and
4. promotes good quality urban design; and
5. maintains rural character in rural areas; and
6. avoids the sprawl of existing settlements or creation of new settlements; and
7. has an efficient, safe and accessible layout; and
8. provides for the health and well-being of communities; and
9. provides accessible, usable and well-designed open space areas; and
10. maintains or enhances the productive capacity of highly productive land and
11. <u>maintains or where appropriate protects the values of relevant overlays.</u>

### 7.5.4 Evaluation

112. The recommended amendment to SUB-O2 to require subdivision to protect the values identified by relevant overlays provides clearer objective-level direction where subdivision may affect identified environmental values. I consider the amended objective is the most appropriate way to achieve the purpose of the RMA as it enables subdivision and associated land development while ensuring that identified values are appropriately protected, consistent with sustainable management and relevant section 6 and 7 matters. Referring broadly to relevant overlays also provides a coherent and flexible approach that can apply to overlays retained or included within the PDP, without unnecessarily duplicating more specific provisions.

## 7.6 Subdivision – SUB-O3

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

| Submitter Name | Submission Point Number(s) |
|---|---|
| **NZTA** | 152.52 |
| **FENZ 2** | 163.45 |
| **Terramark** | 176.11 |

| Submitter Name | Submission Point Number(s) |
|---|---|
| **WCL** | 243.94 |
| **Telcos** | 244.86 |
| **FFNZ** | 246.207 |
| **CRC** | 271.390 |
| **Further Submitter Name** | **Further Submission Point Number(s)** |
| **WPGI** | FS306 |

### 7.6.1 Submissions

114. NZTA [152.52], FENZ 2 [163.45], WCL [243.94], Telcos [244.86] and CRC [271.390] support SUB-O3 and seek that the objective be retained as notified.

115. Terramark [176.11] and FFNZ [246.207] support SUB-O3 in part but seek amendments so infrastructure does not always need to be designed or installed at subdivision stage. Submitters also seek amendments limiting the requirement to the urban environment or otherwise excluding rural and self-serviced properties from needing infrastructure installed at subdivision stage.

116. C Leckie [107.6][1] seek amendments to SUB-O3 as follows on the basis that wastewater, stormwater, electricity, telecommunications) must be physically installed at the time of subdivision for Business and Industrial land. The submitter considers that a more flexible and practical approach that aligns with the realities of business development while ensuring infrastructure can be efficiently provided when required should be provided as business needs vary; the specific servicing needs of future businesses cannot always be accurately predicted at subdivision stage. Forcing early installation often results in poorly located infrastructure that must be reconfigured later to suit actual end users; it is inefficient and costly.

    SUB-O3 Infrastructure

    Subdivision is serviced by infrastructure that has sufficient capacity for the development of the land and has been planned with a requirement for evidence demonstrating that services can be provided efficiently and affordably in the future ~~or provided for in an integrated manner to be in place or installed at the time of the proposed subdivision~~.

### 7.6.2 Analysis

117. Support of NZTA [152.52], FENZ 2 [163.45], WCL [243.94], Telcos [244.86] and CRC [271.390] for SUB-O3 as notified is acknowledged.

118. I acknowledge the concerns raised by Terramark [176.11] and FFNZ [246.207] regarding the timing and applicability of infrastructure requirements. However, I consider SUB-O3 appropriately focuses on ensuring that subdivision is supported by infrastructure with sufficient capacity and that infrastructure provision is integrated with the development of

[1] See submitter table under the General Submissions Topic.

the land. The objective does not prescribe a particular type or scale of infrastructure and therefore provides flexibility to respond to the location and servicing circumstances of individual subdivisions, including where on-site servicing is appropriate.

119. I also do not consider it appropriate to limit SUB-O3 to the urban environment or exclude rural and self-serviced properties. Subdivision outside of urban areas can still give rise to infrastructure and servicing requirements, including water supply, wastewater, stormwater, access and other services. The notified policy framework recognises this by providing for appropriate on-site servicing where reticulated services are unavailable. In my opinion, excluding such subdivision from SUB-O3 would unnecessarily narrow the objective and could result in subdivision occurring without adequate consideration of servicing requirements.

120. While SUB-O3 anticipates infrastructure being in place or installed at the time of subdivision, I consider this appropriately ensures that new allotments can be adequately serviced when created and avoids reliance on uncertain future infrastructure provision. The detailed implementation and timing of particular infrastructure is more appropriately addressed through the policies, rules and conditions of subdivision consent. I therefore do not consider the amendments sought by Terramark and FFNZ necessary.

121. I acknowledge C Leckie's [107.6] concern that the specific servicing requirements of future business and industrial activities may not always be known at the time of subdivision, and that premature installation could result in infrastructure subsequently needing to be altered or relocated.

122. However, I do not consider the amendment sought would provide appropriate objective-level direction. SUB-O3 seeks to ensure that subdivision is supported by infrastructure of sufficient capacity and that infrastructure is planned or provided in an integrated manner, with infrastructure in place or installed at the time of subdivision. This provides certainty that allotments created through subdivision can be appropriately serviced and avoids reliance on uncertain future infrastructure provision.

123. I also consider the proposed reference to demonstrating that services can be provided "efficiently and affordably" would introduce uncertainty as to how affordability is to be determined, and for whom. While flexibility in the detailed design and location of services may be appropriate for some business and industrial subdivision, I consider this is better addressed through the relevant policies, rules and conditions of subdivision consent rather than weakening the outcome sought by SUB-O3.

### 7.6.3 Recommendations

124. I recommend no changes to SUB-O3.

### 7.6.4 Evaluation

125. No further evaluation is required.

## 7.7 Subdivision – SUB-O4

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

| Submitter Name | Submission Point Number(s) |
|---|---|
| **NZTA** | 152.53 |
| **KiwiRail** | 233.68 |
| **Telcos** | 244.87 |
| **Hollamby Trust** | 252.57 |
| **ORC** | 259.76 |
| **CRC** | 271.391 |
| **Meridian** | 294.81 |
| **Transpower** | 309.102 |
| **Further Submitter Name** | **Further Submission Point Number(s)** |
| **PowerNet** | FS197 |
| **Network Waitaki** | FS288 |

### 7.7.1 Submissions

127. NZTA [152.53], KiwiRail [233.68], Hollamby Trust [252.57], ORC [259.76], CRC [271.391], Meridian [294.81] and Transpower [309.102] support SUB-O4 and seek that the objective be retained as notified.

128. Telcos [244.87] support the protection of *regionally significant infrastructure* but consider SUB-O4 is a reverse sensitivity provision. The submitter seeks amendments to delete *regionally significant infrastructure* from the objective.

### 7.7.2 Analysis

129. Support of NZTA [152.53], KiwiRail [233.68], Hollamby Trust [252.57], ORC [259.76], CRC [271.391], Meridian [294.81] and Transpower [309.102] for SUB-O4 as notified is acknowledged.

130. I acknowledge the support of Telcos [244.87] for protecting infrastructure but do not agree that the reference to Regionally Significant Infrastructure should be deleted. SUB-O4 provides overarching direction that subdivision should not compromise the operation or safety of Regionally Significant Infrastructure. In my opinion, this is an appropriate subdivision outcome given that subdivision can establish development patterns and activities in proximity to existing infrastructure that may affect its safe and efficient operation.

131. I also consider that the notified wording appropriately focuses on the effects of subdivision on Regionally Significant Infrastructure, rather than operating solely as a

reverse sensitivity provision. More detailed direction regarding potential adverse and reverse sensitivity effects is provided through SUB-P6, which requires subdivision design to minimise effects on the safe and efficient operation, maintenance of, and access to Regionally Significant Infrastructure. I therefore consider that retaining the reference to Regionally Significant Infrastructure in SUB-O4 provides appropriate objective-level direction for the more detailed policy framework.

### 7.7.3 Recommendations

132. I recommend no changes to SUB-O4.

### 7.7.4 Evaluation

133. No further evaluation is required.

## 7.8 Subdivision – SUB-O5

134. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, eight original submission points and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **Bryry Trust** | 165.91 |
| **DOC** | 194.74 |
| **Kā Rūnaka** | 251.245 |
| **Hollamby Trust** | 252.58 |
| **B & A Johnston** | 255.20 |
| **Fish & Game** | 256.38 |
| **B Burnett** | 258.29 |
| **PKM Farms** | 287.112 |

### 7.8.1 Submissions

135. DOC [194.74] supports SUB-O5 and seeks that the objective be retained as notified.

136. Bryry Trust [165.91], Hollamby Trust [252.58], B & A Johnston [255.20], B Burnett [258.29] and PKM Farms [287.112] support SUB-O5 considering esplanade reserves and strips can support sustainable subdivision outcomes but may not always be appropriate. Submitters seek related amendments to SUB-P9.

137. Kā Rūnaka [251.245] seek amendments to SUB-O5 to include natural character and access to Mahika kai as outcomes of esplanade reserves and strips, alongside ecological, recreational, amenity, public access and management values.

138. Fish & Game [256.38] seeks stronger wording in SUB-O5 to promote esplanade reserves and strips.

### 7.8.2 Analysis

139. Support of DOC [194.74] for SUB-O5 as notified is acknowledged. I also acknowledge the general support of Bryry Trust [165.91], Hollamby Trust [252.58], B & A Johnston [255.20], B Burnett [258.29] and PKM Farms [287.112]. The specific relief sought in relation to SUB-P9 is addressed in the relevant section of this report.

140. I agree with Kā Rūnaka [251.245] that esplanade reserves and esplanade strips can contribute to the maintenance and enhancement of natural character and provide opportunities for access to mahika kai. These outcomes are complementary to the ecological, recreational, amenity and public access outcomes already recognised in SUB-O5. I therefore consider that including these matters would provide more comprehensive recognition of the functions and values of esplanade reserves and strips.

141. I acknowledge the relief sought by Fish & Game [256.38]. However, I consider the notified wording appropriately focuses on the outcomes that esplanade reserves and strips are intended to achieve, rather than directing that their provision should be promoted in all circumstances. This is appropriate as the need for, and form of, an esplanade reserve or strip will depend on the circumstances of the subdivision and the values present. More detailed direction on when esplanade reserves and strips are required is appropriately provided through the policies and rules.

### 7.8.3 Recommendations

142. I recommend that SUB- O5 be amended as follows:

SUB-O5 Subdivision and Regionally Significant Infrastructure

Esplanade reserves and esplanade strips contribute to the maintenance, enhancement and protection of natural character, ecological, recreational and amenity values, public access, access to mahika kai and hazard management

### 7.8.4 Evaluation

143. The recommended amendment to SUB-O5 to recognise natural character and access to mahika kai provides more complete objective-level recognition of the outcomes that esplanade reserves and strips can achieve. The amendment improves the effectiveness of SUB-O5 by recognising these values alongside ecological, recreational, amenity and public access outcomes, while retaining flexibility as to when esplanade reserves or strips are appropriate.

144. The amendment is limited in scope and is not expected to result in material additional environmental, economic, social or cultural costs. It provides environmental and cultural benefits through clearer recognition of natural character and mahika kai values. Retaining the existing outcome-focused wording, rather than strengthening the objective to promote esplanade reserves and strips generally, also avoids creating an expectation that they are appropriate in all subdivision circumstances. I consider the amended SUB-O5 is the most appropriate way to achieve the purpose of the RMA.

## 7.9 Subdivision – SUB-P1

145. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, three original submission points and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **CRC** | 271.392 |
| **E Schultz** | 305.140 |
| **WPG 2** | 306.140 |

### 7.9.1 Submissions

146. CRC [271.392] supports SUB-P1 and seeks that the policy be retained as notified.

147. E Schultz [305.140] and WPG 2 [306.140] support SUB-P1 in part but seeks amendments so that subdivision can create allotments that reflect the existing or intended pattern of development.

### 7.9.2 Analysis

148. Support of CRC [271.392] for SUB-P1 as notified is acknowledged.

149. I acknowledge E Schultz [305.140] and WPG 2 [306.140] consider that subdivision may appropriately reflect an existing pattern of development, rather than only the intended pattern anticipated by the applicable zone. Their proposed amendment would enable subdivision creating allotments that reflect either the existing or intended development pattern.

150. However, I consider the reference to the intended pattern of development is important because SUB-P1 is intended to ensure subdivision supports the future outcomes anticipated by the applicable zone. Existing development patterns may reflect historic subdivision or development that is no longer consistent with the role, character, amenity values or development form sought by the PDP. Enabling subdivision on the basis that it reflects an existing pattern could therefore perpetuate unsustainable patterns that the PDP does not seek to maintain or replicate.

151. I consider the notified wording provides clearer direction by linking the creation of allotments to both the intended development pattern and the anticipated role, character and amenity values of the applicable zone. Accordingly, I do not consider it necessary to amend SUB-P1 to also refer to the existing pattern of development.

### 7.9.3 Recommendations

152. I recommend no change to SUB-P1.

### 7.9.4 Evaluation

153. No further evaluation is required.

## 7.10 Subdivision – SUB-P2

154. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, eight original submission points and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **Bryry Trust** | 165.92 |
| **Hollamby Trust** | 252.59 |
| **B Burnett** | 258.30 |
| **R & H Ambler** | 268.66 |
| **CRC** | 271.393 |
| **PKM Farms** | 287.113 |
| **E Schultz** | 305.141 |
| **WPG 2** | 306.141 |

### 7.10.1 Submissions

155. Bryry Trust [165.92], Hollamby Trust [252.59], B Burnett [258.30], R & H Ambler [268.66], CRC [271.393], PKM Farms [287.113], E Schultz [305.141], WPG 2 [306.141] support SUB-P2 and seek that the policy be retained as notified.

### 7.10.2 Analysis

156. Support from Bryry Trust [165.92], Hollamby Trust [252.59], B Burnett [258.30], R & H Ambler [268.66], CRC [271.393], PKM Farms [287.113], E Schultz [305.141], WPG 2 [306.141] for SUB-P2 is acknowledged.

### 7.10.3 Recommendations

157. I recommend no change to SUB-P2.

### 7.10.4 Evaluation

158. No further evaluation is required.

## 7.11 Subdivision – SUB-P3

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

| Submitter Name | Submission Point Number(s) |
|---|---|
| **B de Geest** | 51.41 |

| Submitter Name | Submission Point Number(s) |
|---|---|
| **FENZ 2** | 163.46 |
| **NPHS** | 164.5 |
| **KiwiRail** | 233.69 |
| **MOED** | 242.28 |
| **Telcos** | 244.88 |
| **FFNZ** | 246.208 |
| **CRC** | 271.394 |
| **Network Waitaki** | 288.67 |
| **E Schultz** | 305.142 |
| **WPG 2** | 306.142 |
| **Further Submitter Name** | **Further Submission Point Number(s)** |
| **PowerNet** | FS197 |
| **Network Waitaki** | FS288 |

### 7.11.1 Submissions

160. FENZ 2 [163.46], NPHS [164.5], KiwiRail [233.69] and CRC [271.394] support SUB-P3 and seek that the policy be retained as notified.

161. B de Geest [51.41], FFNZ [246.208], E Schultz [305.142] and WPG 2 [306.142] seek amendments to provide more flexibility about when infrastructure must be installed and seek wording requiring capacity to be demonstrated or infrastructure to be installed *where appropriate*.

162. MOED [242.28] supports SUB-P3 in principle but seeks recognition of social infrastructure, including educational facilities, so that population growth and school capacity are considered through subdivision.

163. Telcos [244.88] support integrated infrastructure provision but seek amendments referencing relevant infrastructure company standards where infrastructure is not provided by WDC.

164. Network Waitaki [288.67] supports SUB-P3 but seeks a wording amendment to refer to *electricity connections* rather than *power supply*, to align with SUB-S9.

### 7.11.2 Analysis

165. Support of FENZ 2 [163.46], NPHS [164.5], KiwiRail [233.69] and CRC [271.394] for SUB-P3 as notified is acknowledged.

166. I acknowledge the concerns of B de Geest [51.41], FFNZ [246.208], E Schultz [305.142] and WPG 2 [306.142] regarding flexibility in the timing of infrastructure provision. However, I consider SUB-P3 appropriately seeks to ensure that subdivision is adequately serviced and that necessary infrastructure has sufficient capacity to accommodate

anticipated development. Introducing qualifiers such as 'where appropriate' would weaken this direction and create uncertainty as to when servicing requirements apply. The nature and scale of infrastructure required can respond to the location, scale and circumstances of the subdivision without requiring amendment to the policy.

167. In relation to MOED [242.28], I agree that SUB-P3 should recognise the role of social infrastructure, including educational facilities, in supporting subdivision and growth. This is consistent with the broader approach to infrastructure under the NPS-I, including its recognition of additional infrastructure. In my opinion, recognising social infrastructure within SUB-P3 would better support integrated planning by ensuring that the infrastructure implications of growth are considered more broadly than the physical services required to individual allotments. I consider an amendment appropriate to recognise social infrastructure, including educational facilities, while avoiding a requirement for individual subdivision applications to demonstrate school capacity in every circumstance.

168. I acknowledge Telcos [244.88] request to refer to the standards of relevant infrastructure providers where infrastructure is not provided by WDC. While compliance with relevant network operator requirements may be necessary to obtain connections, I do not consider it appropriate to incorporate external infrastructure company standards into SUB-P3. Such standards may vary between providers, change over time and are more appropriately addressed through the relevant infrastructure provider's approval and connection processes.

169. I acknowledge that Network Waitaki [288.67] considers electricity connections would provide greater consistency with the terminology in SUB-S9. However, SUB-P3 provides broader policy direction regarding the infrastructure necessary to service subdivision. In this context, I consider power supply appropriately describes the servicing outcome sought and does not need to replicate the more specific terminology used in SUB-S9. I therefore do not consider an amendment necessary.

### 7.11.3 Recommendations

170. I recommend the following changes to SUB-P3:

SUB-P3 Provision if Infrastructure

Require infrastructure to be provided in an integrated and comprehensive manner by:

1. ensuring that the subdivision will be appropriately serviced and integrated with existing and planned infrastructure <u>including additional infrastructure</u>; and
2. ensuring that infrastructure meets WDC standards and has sufficient capacity to accommodate the development or anticipated future development; and
3. requiring infrastructure to be installed at the time of subdivision; and
4. requiring connections to reticulated systems, where reticulation services are available for the allotment, or are within close proximity to the site; and
5. ensuring that appropriate on-site wastewater, stormwater and water supply infrastructure, which avoids or mitigates adverse effects on the environment and human health and with sufficient capacity for firefighting purposes, is provided on-site where reticulated services are not available for the site; and

6. ensuring telecommunications and power supply is provided to all allotments.

### 7.11.4 Evaluation

171. The recommended amendment to SUB-P3 to recognise social infrastructure, including educational facilities, will improve the effectiveness of the policy by providing for a more integrated approach to infrastructure planning and recognising the wider infrastructural requirements associated with subdivision and growth. The amendment is consistent with the broader approach to infrastructure under the NPS-I, including its recognition of additional infrastructure.

172. The amendment is not intended to require social infrastructure to be provided as part of every subdivision, or for individual subdivision applications to demonstrate educational facility capacity in all circumstances. Rather, it ensures that relevant social infrastructure requirements can be considered where appropriate. This provides environmental, social and economic benefits through better integration of land development and infrastructure planning, without imposing material additional costs on subdivision. I consider the recommended amendment to SUB-P3 is the most appropriate way to achieve the objectives of the PDP and the purpose of the RMA.

## 7.12 Subdivision – SUB-P4

173. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, six original submission points and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **NZTA** | 152.50, 152.54 |
| **FENZ 2** | 163.47 |
| **KiwiRail** | 233.70 |
| **WCL** | 243.95 |
| **CRC** | 271.395 |

### 7.12.1 Submissions

174. NZTA [152.50, 152.54], FENZ 2 [163.47], KiwiRail [233.70] and CRC [271.395] support SUB-P4 and seek that the policy be retained as notified.

175. WCL [243.95] opposes SUB-P4 in part and seeks an additional clause requiring that any additional load on the transport network can be effectively managed and operated.

### 7.12.2 Analysis

176. Support of NZTA [152.50, 152.54], FENZ 2 [163.47], KiwiRail [233.70] and CRC [271.395] for SUB-P4 as notified is acknowledged.

177. I acknowledge WCL's [243.95] concern that subdivision may generate additional demand on the transport network. However, I consider this matter is already adequately addressed by the overarching direction in SUB-P4 to ensure that subdivision does not compromise the safe and efficient functioning of the transport network. The policy supports this outcome through requirements relating to road and access design, network connectivity, future connections, provision for different travel modes, and safe and efficient access to State Highways.

178. In my opinion, an additional clause requiring any additional load on the transport network to be effectively managed and operated would largely duplicate this existing direction. The effects of increased transport demand are also more appropriately considered through the relevant Transport Chapter provisions, which specifically address activities that generate traffic and their effects upon the safe and efficient functioning of the transport network. I therefore do not consider the additional clause sought by WCL necessary.

### 7.12.3 Recommendations

179. I recommend no changes to SUB-P4.

### 7.12.4 Evaluation

180. No further evaluation is required.

## 7.13 Subdivision – SUB-P5

181. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, three original submission points and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **Telcos** | 244.89 |
| **CRC** | 271.396 |
| **Network Waitaki** | 288.68 |

### 7.13.1 Submissions

182. Telcos [244.89], CRC [271.396] and Network Waitaki [288.68] support SUB-P5 and seek that the policy be retained as notified.

### 7.13.2 Analysis

183. Support from Telcos [244.89], CRC [271.396] and Network Waitaki [288.68] for SUB-P5 is acknowledged.

### 7.13.3 Recommendations

184. I recommend no changes to SUB-P5.

### 7.13.4 Evaluation

185. No further evaluation is required.

## 7.14 Subdivision – SUB-P6

186. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, 10 original submission points and one further submission point are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **NZTA** | 152.55 |
| **KiwiRail** | 233.71 |
| **Telcos** | 244.90 |
| **Hollamby Trust** | 252.60 |
| **ORC** | 259.77 |
| **CRC** | 271.397 |
| **PKM Farms** | 287.114 |
| **Network Waitaki** | 288.69 |
| **Meridian** | 294.82 |
| **Transpower** | 309.103 |
| **Further Submitter Name** | **Further Submission Point Number(s)** |
| **PowerNet** | FS197 |

### 7.14.1 Submissions

187. NZTA [152.55], KiwiRail [233.71], Hollamby Trust [252.60], ORC [259.77], CRC [271.397], PKM Farms [287.114], Network Waitaki [288.69] and Transpower [309.103] support SUB-P6 and seek that the policy be retained as notified.

188. Telcos [244.90] support SUB-P6 but seek amendments because they seek the deletion of *Regionally Significant Infrastructure* elsewhere.

189. Meridian [294.82] opposes SUB-P6 and seeks amendments requiring subdivision to avoid adverse effects on the Waitaki Power Scheme.

### 7.14.2 Analysis

190. Support of NZTA [152.55], KiwiRail [233.71], Hollamby Trust [252.60], ORC [259.77], CRC [271.397], PKM Farms [287.114], Network Waitaki [288.69] and Transpower [309.103] for SUB-P6 as notified is acknowledged.

191. Telcos [244.90] seek consequential amendments arising from their broader relief to delete the defined term Regionally Significant Infrastructure. As discussed in relation to SUB-O4, I consider it appropriate to retain specific recognition of Regionally Significant

Infrastructure within the subdivision framework. SUB-P6 appropriately implements SUB-O4 by requiring subdivision design to minimise adverse effects on the safe and efficient operation, maintenance of, and access to Regionally Significant Infrastructure. I therefore do not consider consequential amendment to SUB-P6 necessary.

192. I acknowledge Meridian's [294.82] concern regarding the effects of subdivision on the Waitaki Power Scheme. However, I do not consider it necessary to amend SUB-P6 to require adverse effects on the Waitaki Power Scheme to be avoided. The Waitaki Power Scheme is already addressed more specifically through SUB-P8, which requires subdivision within Hydroelectricity Inundation Hazard Areas to demonstrate that it will not compromise the ongoing operation of the Waitaki Power Scheme and more comprehensively protected via the Energy Chapter provisions. In my opinion, this more targeted provision appropriately addresses the relationship between subdivision and the Waitaki Power Scheme, while SUB-P6 provides broader direction for Regionally Significant Infrastructure. Requiring all adverse effects on the Waitaki Power Scheme to be avoided through SUB-P6 would impose a more stringent and less nuanced effects-management approach than is necessary.

### 7.14.3 Recommendations

193. I recommend no change to SUB-R6.

### 7.14.4 Evaluation

194. No further evaluation is required.

## 7.15 Subdivision – SUB-P7

195. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, two original submission points and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **CRC** | 271.398 |
| **Transpower** | 309.104 |

### 7.15.1 Submissions

196. CRC [271.398] supports SUB-P7 and seeks that the policy be retained as notified.

197. Transpower [309.104] supports the intent of the policy but seeks amendments to better align with NPSET, including:

> Avoid locating building platforms within the National Grid Yard and only allow for subdivision within the National Grid Subdivision Corridor where it can be demonstrated that any reverse sensitivity effects will be avoided, and any other adverse effects on and from the National Grid, including public health and safety, will be avoided, remedied or mitigated, taking into account:

1. the impact of subdivision layout and design on the operation, maintenance, upgrade and development of the National Grid, including continued and reasonable access to transmission assets;

...

7. the nature and location of any proposed vegetation to be planted within the National Grid Yard; and

8. the outcome of any consultation with, and technical advice from, Transpower.

### 7.15.2 Analysis

198. Support of CRC [271.398] for SUB-P7 as notified is acknowledged.

199. I acknowledge Transpower's [309.104] support for the intent of SUB-P7 and consider that targeted amendments are appropriate. In particular, I agree that the policy should more explicitly address reverse sensitivity effects associated with subdivision in proximity to the National Grid. Subdivision can establish development patterns that constrain the ongoing operation, maintenance, upgrading and development of the National Grid, and recognising reverse sensitivity effects provides appropriate direction to manage this potential conflict. I consider this amendment will assist in giving effect to the NPS-EN, which has replaced the NPSET.

200. I also agree that clause 1 should expressly recognise the need to maintain continued and reasonable access to transmission assets. Ensuring subdivision layout and design does not impede access to National Grid infrastructure is important to its ongoing operation, maintenance, upgrading and development and will similarly assist in giving effect to the NPS-EN.

201. However, I do not consider it necessary to include Transpower's proposed clause relating to the nature and location of vegetation within the National Grid Yard. Vegetation effects are more appropriately addressed through the specific provisions applying to activities within the National Grid Yard specified in the Infrastructure chapter and do not need to be duplicated within SUB-P7.

202. I also do not support including the outcome of consultation with, or technical advice from, Transpower as a specific policy consideration. While engagement with Transpower may assist in the design and assessment of individual subdivision proposals, consultation is a process rather than an environmental outcome. In my opinion, SUB-P7 should focus on the substantive effects of subdivision on the National Grid rather than prescribe consultation or the weight to be given to advice from a particular infrastructure provider.

### 7.15.3 Recommendations

203. I recommend the following changes to SUB-P7:

SUB-P7 Subdivision and the ~~National Grid~~ Electricity Transmission Network

Avoid locating building platforms within the ~~National Grid~~ Electricity Transmission Network Yard and only allow for subdivision within the ~~National Grid~~ Electricity Transmission Network Subdivision Corridor where it can be demonstrated that any reverse sensitivity

effects will be avoided and any other adverse effects on the Electricity Transmission Network ~~National~~ Grid will be avoided, remedied, or mitigated, taking into account:

1. the impact of subdivision layout and design on the operation, maintenance, upgrade and development of the Electricity Transmission Network National Grid, including continued and reasonable access to transmission assets;
2. the ability of future development to comply with the New Zealand Code of Practice for Electrical Safe Distances 2001 (NZECP 34:2001);
3. the extent to which the design, construction and layout of the subdivision (including landscaping) demonstrates that a suitable building platform(s) for a dwelling can be provided outside of the Electricity Transmission Network ~~National Grid~~ Yard for each new lot to ensure adverse effects on and from the Electricity Transmission Network ~~National~~ Grid and on public health and safety are appropriately avoided, remedied, or mitigated;
4. the risk to the structural integrity of the Electricity Transmission Network ~~National~~ Grid;
5. the extent to which the subdivision design and consequential development will minimise the risk of injury and/or property damage from such lines;
6. the extent to which the subdivision design and consequential development will minimise the potential reverse sensitivity on, and amenity and nuisance effects of, the transmission asset.

### 7.15.4 Evaluation

204. In accordance with s32AA, I consider the recommended amendments to SUB-P7 are a more effective means of achieving the relevant subdivision objectives by providing clearer direction to manage reverse sensitivity effects and maintain continued and reasonable access to National Grid transmission assets. The amendments will assist in giving effect to the NPS-EN by reducing the potential for subdivision to constrain the ongoing operation, maintenance, upgrading and development of the National Grid.

205. In terms of efficiency, the amendments provide greater certainty for applicants, Transpower and decision-makers as to the matters that should inform subdivision layout and design. The amendments are targeted and are not anticipated to result in material additional environmental, economic, social or cultural costs. Rather, they provide benefits by reducing the potential for land-use conflict and constraints on nationally significant infrastructure. The additional vegetation and consultation requirements sought by Transpower are not considered necessary to achieve these outcomes and would add unnecessary duplication and prescription.

206. Having considered the benefits and costs, and the reasonably practicable option of retaining SUB-P7 as notified, I consider the recommended amendments provide a more efficient and effective means of achieving the relevant objectives of the PDP and are therefore the most appropriate provisions for the purposes of s32.

## 7.16 Subdivision – SUB-P8

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

to each point is provided in full in **Appendix 2**. Overall, two original submission points and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **CRC** | 271.399 |
| **Meridian** | 294.83 |

### 7.16.1 Submissions

208. CRC [271.399] supports SUB-P8 and seeks that the policy be retained as notified.

209. Meridian [294.83] opposes SUB-P8 and seeks amendments to better align with the NPS-REG, including clause 2 should address managing the potential for reverse sensitivity effects and clause 3 to more clearly prevent subdivision leading to increased risk to people or property from hydroelectricity inundation.

### 7.16.2 Analysis

210. Support of CRC [271.399] for SUB-P8 as notified is acknowledged.

211. I acknowledge Meridian's [294.83] concern that subdivision within Hydroelectricity Inundation Hazard Areas has the potential to create reverse sensitivity effects on the Waitaki Power Scheme. I agree that clause 2 should more explicitly recognise and manage these effects. While the notified provision requires subdivision to demonstrate that it will not compromise the ongoing operation of the Waitaki Power Scheme, expressly addressing reverse sensitivity provides clearer policy direction and better recognises the potential for subdivision and subsequent development to constrain the ongoing operation of the Scheme. I consider this amendment will better give effect to the NPS-REG.

212. I also agree with Meridian that clause 3 should provide clearer direction regarding the consequences of subdivision for hydroelectricity inundation risk. Subdivision can establish development patterns that increase the exposure of people and property to an existing inundation hazard. In my opinion, expressly requiring subdivision not to increase risk to people or property from hydroelectricity inundation provides a clearer and more effective policy response than the more general notified direction relating to natural hazard risk.

213. I therefore consider targeted amendments to SUB-P8 appropriate to expressly manage potential reverse sensitivity effects on the Waitaki Power Scheme and ensure that subdivision does not increase the risk to people or property from hydroelectricity inundation. These amendments strengthen and clarify the notified policy direction and better recognise both the operational requirements of the Waitaki Power Scheme and the consequences of subdivision within areas subject to hydroelectricity inundation.

### 7.16.3 Recommendations

214. I recommend the following changes to SUB-P8:

SUB-P8 Subdivision in the Waitaki Power Scheme Hydroelectricity Inundation Hazard

Areas

Only allow subdivision in Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas, where it can be demonstrated that:

1. any building platforms will be located outside of any identified Waitaki Power Scheme Hydroelectricity High Hazard Area; and
2. the subdivision will not increase the potential for reverse sensitivity effects that would compromise the ongoing operation, minor upgrading and maintenance or major upgrade of the Waitaki Power Scheme; and
3. the subdivision will not increase the likelihood or scale of harm to people or property from hydroelectricity inundation ~~any risk to lives and well-being from an uncontrolled release of water from the Waitaki Power Scheme is acceptable~~.

### 7.16.4 Evaluation

215. In accordance with s32AA, I consider the recommended amendments to SUB-P8 provide a more effective means of achieving the relevant subdivision objectives by expressly addressing reverse sensitivity effects on the Waitaki Power Scheme and providing clearer direction that subdivision should not increase the risk to people or property from hydroelectricity inundation. The amendments also better give effect to the NPS-REG.

216. In terms of efficiency, the amendments provide greater certainty for applicants, infrastructure operators and decision-makers regarding the outcomes expected from subdivision within Hydroelectricity Inundation Hazard Areas. They are targeted refinements to the notified policy and are not anticipated to result in material additional environmental, economic, social or cultural costs. Benefits arise from reducing the potential for land-use conflict with the Waitaki Power Scheme and avoiding increased exposure of people and property to inundation risk.

217. Having considered the benefits and costs, and the reasonably practicable option of retaining SUB-P8 as notified, I consider the recommended amendments provide a more efficient and effective means of achieving the relevant objectives of the PDP and are therefore the most appropriate provisions for the purposes of s32.

## 7.17 Subdivision – SUB-P9

218. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, nine original submission points and 1 further submission point are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **Bryry Trust** | 165.93 |
| **Shelton Downs** | 193.12 |
| **FFNZ** | 246.209 |
| **Hollamby Trust** | 252.61 |
| **B & A Johnston** | 255.21 |

| Submitter Name | Submission Point Number(s) |
|---|---|
| **B Burnett** | 258.31 |
| **R & H Ambler** | 268.67 |
| **CRC** | 271.400 |
| **PKM Farms** | 287.115 |
| **Further Submitter Name** | **Further Submission Point Number(s)** |
| **Forest & Bird** | FS253 |

### 7.17.1 Submissions

219. CRC [271.400] supports SUB-P9 and seeks that the policy is retained as notified.

220. Bryry Trust [165.93], Hollamby Trust [252.61], B & A Johnston [255.21], B Burnett [258.31], R & H Ambler [268.67] and PKM Farms [287.115] support SUB-P9 in part but seek amendments so esplanade reserves and strips are encouraged where appropriate rather than required in all cases. The submitters consider esplanade reserves or strips should only be required where there is public benefit, they are practical and maintenance costs are managed by Council.

221. Shelton Downs [193.12] seeks amendments, so esplanade reserves or strips are not required where public access already exists.

222. FFNZ [246.209] supports SUB-P9 in part but seeks clarification that esplanade reserves and strips are only required where subdivision creates an allotment of less than 4ha, consistent with SUB-S10.

### 7.17.2 Analysis

223. Support of CRC [271.400] for SUB-P9 as notified is acknowledged.

224. I acknowledge the concerns of Bryry Trust [165.93], Hollamby Trust [252.61], B & A Johnston [255.21], B Burnett [258.31], R & H Ambler [268.67] and PKM Farms [287.115] that esplanade reserves and strips may not be necessary or appropriate in every circumstance. However, I consider the notified policy already provides sufficient flexibility by identifying the purposes for which esplanade reserves and strips are to be provided, including protection of conservation values, enabling public access and recreational use, and maintaining or enhancing aquatic habitat and water quality. The appropriateness of a reserve or strip can therefore be considered having regard to the particular values and circumstances of the site. I do not consider replacing the directive wording with encourage would provide sufficient policy direction to achieve these outcomes.

225. I also do not consider it appropriate for SUB-P9 to make provision dependent on Council accepting responsibility for maintenance costs. The purpose of the policy is to establish the resource management outcomes sought through subdivision, rather than determine responsibility for the future administration or maintenance of land. Those matters can be addressed through the particular mechanism used and the subdivision process.

226. In relation to Shelton Downs [193.12], I acknowledge that existing public access is relevant when determining the need for an esplanade reserve or strip. However, public access is only one of the functions of esplanade reserves and strips. They may also be necessary to protect conservation values, provide recreational opportunities, maintain or enhance aquatic habitat and water quality, or achieve other identified outcomes. Existing public access alone therefore does not provide an appropriate basis for excluding the requirement.

227. I acknowledge FFNZ's [246.209] request to align SUB-P9 more explicitly with the 4ha threshold in SUB-S10. However, I do not consider it necessary to reproduce the detailed circumstances in which esplanade reserves or strips are required within the policy. SUB-S10 establishes the applicable rule and standard framework, while SUB-P9 provides the policy direction for assessing and implementing esplanade provision. In my opinion, retaining that distinction avoids unnecessary duplication and enables the policy to remain applicable where esplanade provision is relevant under the wider subdivision framework.

### 7.17.3 Recommendations

228. I recommend no change to SUB-P9.

### 7.17.4 Evaluation

229. No further evaluation is required.

## 7.18 Subdivision – SUB-P10

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

| Submitter Name | Submission Point Number(s) |
|---|---|
| **Hort NZ** | 166.38 |
| **FFNZ** | 246.210 |
| **Kā Rūnaka** | 251.246 |
| **CRC** | 271.401 |
| **Further Submitter Name** | **Further Submission Point Number(s)** |
| **Forest & Bird** | FS253 |

### 7.18.1 Submissions

231. CRC [271.401] supports SUB-P10 and seeks that the policy be retained as notified.

232. Hort NZ [166.38] supports SUB-P10 in part but seeks amendments so health and safety risks and potential constraints on the use of highly productive land are considered when determining whether to require an esplanade reserve or strip.

233. FFNZ [246.210] supports SUB-P10 in part but seeks clarification that esplanade reserves and strips are only required where subdivision creates an allotment of less than 4ha, consistent with SUB-S10.

234. Kā Rūnaka [251.246] seek amendments to SUB-P10 so that natural character and access to Mahika kai are included as relevant considerations when assessing the contribution of esplanade reserves or strips.

### 7.18.2 Analysis

235. The support of CRC [271.401] for SUB-P10 as notified is acknowledged.

236. I acknowledge Hort NZ's [166.38] concern regarding the potential implications of esplanade reserves and strips for highly productive land. However, I consider SUB-P10 already provides an appropriate framework for determining whether an esplanade reserve or strip is warranted by requiring consideration of the relevant characteristics and values of the site. The potential effects of esplanade provision on rural land use can be considered through this assessment. I do not consider it necessary to specifically identify health and safety risks or potential constraints on the use of highly productive land within the policy, particularly as these matters will be dependent on the circumstances of each subdivision.

237. I acknowledge FFNZ's [246.210] request to clarify that SUB-P10 applies only where subdivision creates an allotment of less than 4ha, consistent with SUB-S10. As discussed in relation to SUB-P9, I do not consider it necessary to duplicate the detailed thresholds applying to esplanade provision within the policy framework. SUB-S10 establishes the circumstances in which the relevant standard applies, while SUB-P10 provides direction for determining the appropriate form and extent of esplanade provision where it is relevant.

238. I agree with Kā Rūnaka [251.246] that natural character and access to mahika kai are relevant considerations when assessing the contribution of an esplanade reserve or strip. These matters complement the ecological, recreational, amenity and public access values already addressed through the esplanade provisions and are consistent with the recommended amendment to SUB-O5. Including these matters within SUB-P10 would provide clearer and more comprehensive direction when determining the appropriate esplanade provision for a particular subdivision.

### 7.18.3 Recommendations

239. I recommend that the following changes to SUB-P10:

SUB-P10 Esplanade reserves and esplanade strips – other waterbodies
Consider the following matters when determining whether to require the creation of an esplanade reserve or esplanade strip for subdivision of land adjoining any other waterbody over 3m in width:
1. the level of contribution to enable public access, recreational use or the protection of conservation, natural character or takata whenua values including access to mahika kai; and
2. the appropriate mechanism to achieve 1.

### 7.18.4 Evaluation

240. In accordance with s32AA, I consider the recommended amendment to SUB-P10 to include natural character and access to mahika kai as relevant considerations provides a more effective means of achieving the relevant subdivision objectives. In particular, recognising the contribution of esplanade reserves and strips to natural character is an appropriate consideration and is consistent with the methods in the ORPS, including ECO-M9 (3) and HCV-WT-M3(5). Recognition of access to mahika kai also provides clearer direction for considering the cultural values and functions associated with margins of water bodies.

241. In terms of efficiency, the amendment builds on the existing assessment framework in SUB-P10 rather than introducing a separate process or requirement. It enables natural character and mahika kai values to be considered alongside the other relevant values when determining esplanade provision and is therefore unlikely to result in material additional costs. The amendment provides environmental and cultural benefits through more comprehensive consideration of the values associated with water body margins and greater consistency with the ORPS.

242. Having considered the benefits and costs, and the reasonably practicable option of retaining SUB-P10 as notified, I consider the recommended amendment provides a more efficient and effective means of achieving the relevant objectives of the PDP and is therefore the most appropriate provision for the purposes of s32.

## 7.19 Subdivision – SUB-P11

243. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, three original submission points and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **Kā Rūnaka** | 251.247 |
| **CRC** | 271.402 |
| **Bryry Trust** | 165.94 |

### 7.19.1 Submissions

244. CRC [271.402] supports SUB-P11 and seeks that the policy is retained as notified.

245. Kā Rūnaka [251.247] seek amendments to SUB-P11, considering the policy is unclear and should be restructured to better address criteria for exemptions, reductions and waivers of esplanade reserves and strips. Kā Rūnaka seek recognition of customary access, natural character, wāhi tūpuna, long-term climate change effects and the role of esplanade strips in providing for access, recreation, hazard management, stormwater management and ecological values.

246. Bryry Trust [165.94] considers that SUB-P11 'Reductions or waivers of esplanade reserves and esplanade strips' is opposed as drafted as if the Subdivision does not affect SASM SCHED5 Values then there is no reason for a reduction. Seeking amendment of SUB-P11 as follows:

Amend SUB-P11 'Reductions or waivers of esplanade reserves and esplanade strips' as follows:

Activity status: ~~Discretionary~~ Permitted

PER-1 – where the subdivision does not impact the listed values associated with the identified SASM;

Activity status where PER-1 is not achieved: Discretionary

### 7.19.2 Analysis

247. Support of CRC [271.402] for SUB-P11 as notified is acknowledged.

248. I acknowledge Kā Rūnaka's [251.247] concern regarding the clarity of SUB-P11. However, I consider the notified policy appropriately provides a framework for determining whether an exemption from, or reduction or waiver of, an esplanade reserve or strip is appropriate having regard to the particular circumstances and values of the site. I do not consider that restructuring the policy or substantially expanding the assessment criteria is necessary to provide effective policy direction.

249. I acknowledge that customary access, natural character and wāhi tūpuna may be relevant considerations when determining whether esplanade provision should be reduced or waived. However, these values are addressed through the wider PDP framework and, in relation to natural character and access to mahika kai, through the amendments recommended to SUB-O5 and SUB-P10. I consider this provides appropriate recognition without duplicating those matters within SUB-P11.

250. I also acknowledge the relief seeking consideration of long-term climate change effects and the potential contribution of esplanade strips to hazard and stormwater management. However, these matters are more appropriately addressed through the relevant natural hazard, infrastructure and subdivision provisions where applicable. Their relevance will also vary considerably depending upon the location and circumstances of the subdivision, and I do not consider they need to be prescribed as additional criteria within SUB-P11.

251. Similarly, the potential contribution of esplanade strips to public access, recreation and ecological values is already integral to the wider esplanade framework, including SUB-P9 and SUB-P10. In my opinion, repeating these matters within the exemption, reduction and waiver policy would add unnecessary duplication rather than improve its effectiveness.

252. I do not support the relief sought by Bryry Trust [165.94] as SASM identified in schedule 5 were withdrawn from the PDP. Furthermore, reductions in esplanade reserves must consider matters wider than potential cultural values.

### 7.19.3 Recommendations

253. I recommend no changes to SUB-P11.

### 7.19.4 Evaluation

254. No further evaluation is required.

## 7.20 Subdivision – SUB-P12

255. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, 22 original submission points and six further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **WDC** | 83.17 |
| **FENZ 2** | 163.48 |
| **NPHS** | 164.9 |
| **Hort NZ** | 166.39 |
| **Shelton Downs** | 193.13 |
| **NZ Pork** | 195.27 |
| **KiwiRail** | 233.72 |
| **MOED** | 242.29 |
| **Forest & Bird** | 253.138 |
| **CRC** | 271.403 |
| **E Schultz** | 305.143 |
| **WPG 2** | 306.143 |
| **BA Thomson** | 183.45 |
| **VA & GJ Paton** | 270.43 |
| **C & C Harvey** | 273.60 |
| **GA & MA Farmer** | 274.60 |
| **M & N Hay** | 275.46 |
| **PR & JP Winders** | 276.46 |
| **A & JJ Hales** | 277.46 |
| **C Willetts & C Anderson** | 276.46 |
| **PJ Rutledge** | 279.60 |
| **AG & EM King** | 307.44 |
| **Further Submitter Name** | **Further Submission Point Number(s)** |
| **NHCTTA** | FS153 |

| Submitter Name | Submission Point Number(s) |
|---|---|
| **FFNZ** | FS246 |
| **PowerNet** | FS197 |
| **Network Waitaki** | FS288 |

### 7.20.1 Submissions

256. NPHS [164.9], NZ Pork [195.27], KiwiRail [233.72] and CRC [271.403] support SUB-P12 and seek that the policy be retained as notified.

257. WDC [83.17] seeks minor amendments to SUB-P12 for grammatical consistency, seeking to amend wording to add a semi-colon and the word 'and' to SUB-P12 Clause 11 rather than a full stop for grammatical consistency.

258. Hort NZ [166.39] supports SUB-P12 in part and seeks stronger protection for productive rural land, including a clause requiring subdivision to protect highly productive land from loss, fragmentation or incompatible use.

259. Shelton Downs [193.13] seeks amendments to provide more flexibility in applying subdivision design outcomes, including where sufficient public access is already provided. The submitter seeks recognition that subdivision can be anticipated within ONLs where it does not significantly adversely affect ONL values.

260. MOED [242.29] supports SUB-P12 but seeks an additional clause requiring subdivision to promote accessibility to social infrastructure, so population growth and impacts upon schools are considered.

261. Forest & Bird [253.138] opposes SUB-P12 in part and seeks additional requirements for subdivision design to integrate the natural environment, increase indigenous vegetation cover and restore or enhance indigenous biodiversity.

262. E Schultz [305.143] and WPG 2 [306.143] support good subdivision design principles but seek amendments so several requirements apply *where appropriate*.

263. FENZ 2 [163.48] seeks an addition to ensure that subdivision is designed and located to provide adequate emergency service access.

264. BA Thomson BA Thomson [183.45], VA & GJ Paton [270.43], C & C Harvey [273.60], GA & MA Farmer [274.60], M & N Hay [275.46], PR & JP Winders [276.46], A & JJ Hales [277.46], C Willetts & C Anderson [276.46], PJ Rutledge [279.60] and AG & EM King [307.44] considers it is unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. Seeking the following amendments to SUB-P12:

    7. when within any scheduled wāhi tūpuna in SCHED5 – Sites and Areas of Significance to Māori (except in relation to any land which is privately owned or residentially or rurally zoned)for any greenfield subdivision,...

### 7.20.2 Analysis

265. Support of FENZ 2 [163.48], NPHS [164.9], NZ Pork [195.27], KiwiRail [233.72] and CRC [271.403] for SUB-P12 as notified is acknowledged.

266. I acknowledge WDC's [83.17] amendments to improve grammatical consistency. I consider minor drafting amendments that improve the clarity and readability of SUB-P12 are appropriate where they do not alter the substantive direction of the policy.

267. In relation to Hort NZ [166.39], I acknowledge the importance of managing subdivision to maintain the productive capacity of highly productive land. However, this matter is already addressed through SUB-O2 and the more specific rural subdivision policies, as well as the wider PDP provisions applying to highly productive land. I do not consider it necessary to duplicate this direction within SUB-P12 by adding a specific requirement to protect highly productive land from loss, fragmentation or incompatible use.

268. I acknowledge the Shelton Downs [193.13] request for greater flexibility. However, SUB-P12 provides overarching design direction applicable across a range of subdivision circumstances, and the relevance and weight of individual matters can be considered in the context of each particular proposal. Existing public access does not necessarily remove the relevance of other subdivision design outcomes. Similarly, subdivision within an ONL is more appropriately considered against the specific objectives and policies applying to ONLs rather than through an amendment to the general subdivision design policy.

269. In relation to MOED [242.29], I acknowledge that accessibility to social infrastructure, including educational facilities, is relevant to well-functioning and appropriately serviced communities. However, unlike SUB-P3, which specifically addresses the provision of infrastructure associated with subdivision, SUB-P12 is principally concerned with the physical design and layout of subdivision. I therefore consider recognition of social infrastructure is more appropriately incorporated through the recommended amendment to SUB-P3 and does not need to be duplicated within SUB-P12.

270. I acknowledge the outcomes sought by Forest & Bird [253.138] relating to integration with the natural environment and indigenous biodiversity. However, these matters are addressed through the more specific PDP provisions applying to indigenous biodiversity and other natural environment values. Requiring subdivision generally to increase indigenous vegetation cover and restore or enhance indigenous biodiversity would also apply irrespective of the ecological values or circumstances of the site. I do not consider such a broad requirement is appropriate within SUB-P12.

271. I acknowledge E Schultz [305.143] and WPG 2 [306.143] seek greater flexibility by applying qualifiers where they are appropriate to several design requirements. However, I consider the matters identified in SUB-P12 establish appropriate design considerations for subdivision and inherently allow their application to respond to the location, scale and characteristics of a proposal. Adding repeated where appropriate qualifiers would weaken the policy direction and introduce unnecessary uncertainty as to when the identified outcomes are expected to be achieved.

272. I acknowledge FENZ 2's [163.48] request that SUB-P12 expressly require subdivision to provide adequate emergency service access. I agree that subdivision design should enable safe and practical access for emergency service vehicles. However, I consider this outcome is already adequately addressed through the wider subdivision framework, including requirements relating to accessibility, connectivity and the safe and efficient design of the transport network. SUB-P12 itself requires subdivision to maximise accessibility and connectivity through an interconnected transport network. In my opinion, adding a separate requirement for emergency service access would provide limited additional policy direction and is therefore unnecessary.

273. I acknowledge the concerns raised by BA Thomson [183.45], VA & GJ Paton [270.43], C & C Harvey [273.60], GA & MA Farmer [274.60], M & N Hay [275.46], PR & JP Winders [276.46], A & JJ Hales [277.46], C Willetts & C Anderson [276.46], PJ Rutledge [279.60] and AG & EM King [307.44] regarding the application of SUB-P12 clause 7 to privately owned, residentially zoned or rurally zoned land. However, the relief sought relates specifically to the application of SCHED5 – Sites and Areas of Significance to Māori. As outlined in Section 2.3 of this report, the relevant SCHED5 provisions have subsequently been withdrawn from the PDP and, consequentially, the reference to SCHED5 in SUB-P12 is being deleted. The specific exemption sought for privately owned or residentially or rurally zoned land is therefore no longer necessary. I accordingly recommend rejecting the amendments sought to SUB-P12.

### 7.20.3 Recommendations

274. I recommend the following change to SUB-P12:

SUB-P12 Subdivision Design

Ensure that subdivision is designed and located to:

1. maximise accessibility and connectivity with the surrounding community through walkways, cycleways and an interconnected transport network; and
2. reflect and respond to physical site characteristics, constraints and opportunities; and
3. minimise earthworks and land disturbance by designing building platforms that integrate into the natural landform; and
4. achieve hydraulic neutrality in urban zones; and
5. align streets and design open spaces to focus on significant views or landmarks; and
6. create allotment sizes and shapes that support a range of housing types and sizes and appropriate business activities; and
7. [Withdrawn]
8. minimise future conflicts with roading and infrastructure, including as a result of the planting of new vegetation; and
9. maximise sunlight access, outlook and amenity, including opportunities for future buildings to maximise solar gain, reduce energy and water consumption, and use renewable energy; and
10. provide public open spaces that are within walkable distance (400-800m) from residential allotments; and
11. provide sufficient separation from zone boundaries and transport networks to minimise the potential for any reverse sensitivity effects and/or conflict with existing and

permitted activities on adjoining sites~~.~~; and

12. be consistent with any relevant design guidelines which promote good planning, building design and urban design that give effect to the New Zealand Urban Design Protocol (2005); and
13. incorporate principles of Crime Prevention Through Environmental Design to achieve safe environments.

### 7.20.4 Evaluation

275. I consider that the recommended amendments improve the grammatical clarity and readability of SUB-P12 without altering the substantive direction of the policy and as such no further section 32 AA evaluation is required.

## 7.21 Subdivision – SUB-P13

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

| Submitter Name | Submission Point Number(s) |
|---|---|
| **KiwiRail** | 233.73 |
| **CRC** | 271.404 |
| **Further Submitter Name** | **Further Submission Point Number(s)** |
| **KO** | FS168 |

### 7.21.1 Submissions

277. CRC [271.404] supports SUB-P13 and seeks that the policy be retained as notified.

278. KiwiRail [233.73] seeks amendments to SUB-P13 to ensure reverse sensitivity is considered assessing subdivision in Residential Zones. KiwiRail seeks a requirement for sufficient separation from transport networks to minimise reverse sensitivity effects and conflict with existing permitted activities.

### 7.21.2 Analysis

279. Support of CRC [271.404] for SUB-P13 as notified is acknowledged.

280. I acknowledge KiwiRail's [233.73] concern that residential subdivision can give rise to reverse sensitivity effects where new allotments are located in proximity to transport infrastructure. However, I consider this matter is already appropriately addressed through SUB-P12, which requires subdivision to provide sufficient separation from zone boundaries and transport networks to minimise reverse sensitivity effects and conflict with existing and permitted activities on adjoining sites.

281. SUB-P13 has a more specific role in guiding the design, size and shape of allotments within Residential Zones, including consistency with anticipated residential density and form, housing choice, sunlight, privacy and the relationship to roads and public spaces. In my opinion, repeating the reverse sensitivity direction already contained in SUB-P12 within SUB-P13 would add unnecessary duplication without improving the effectiveness of the policy framework. I therefore consider that SUB-P13 should be retained as notified.

### 7.21.3 Recommendations

282. I recommend no changes to the proposal.

### 7.21.4 Evaluation

283. No evaluation is required.

## 7.22 Subdivision – SUB-P14

284. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, one original submission point and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **CRC** | 271.405 |

### 7.22.1 Submissions

285. CRC [271.405] supports SUB-P14 but seeks amendments for clarification purposes:

Within Ōamaru, is consistent with the Ōamaru Town Centre Design Guidelines.

### 7.22.2 Analysis

286. Support of CRC [271.405] for SUB-P14 is acknowledged, furthermore the amendment proposed is considered to provide clarification and readability of the policy.

### 7.22.3 Recommendations

287. I recommend the following change to SUB-P14:

SUB-P14 Subdivision in Commercial Zones

Provide for subdivision in Commercial Zones where the design, size and shape of allotments:

1. is consistent with and complement the anticipated scale, type and form of use and development for the relevant zone;
2. incorporate setbacks at Residential and Open Space Zone interfaces, to provide sufficient space for planting or landscaping;
3. minimise a proliferation of vehicle crossings that may restrict pedestrian movements;
4. maximises opportunities for retail activity to occur at ground floor level; and

5. within Ōamaru is consistent with the Ōamaru Town Centre Design Guidelines.

### 7.22.4 Evaluation

288. The recommended amendment is considered to provide clarification and improve readability of the policy improving efficiency and effectiveness.

## 7.23 Subdivision – SUB-P16

289. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, 17 original submission points and three further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **NZTA** | 152.51 |
| **Hort NZ** | 166.40 |
| **Bog Roy Station** | 172.3 |
| **Terramark** | 176.12 |
| **Shelton Downs** | 193.14 |
| **NZ Pork** | 195.28 |
| **KiwiRail** | 233.74 |
| **FFNZ** | 246.211 |
| **EPFNZ & PIANZ** | 266.5 |
| **CRC** | 271.406 |
| **P & S Mitchell** | 302.331 |
| **J Laurie (and others)** | 76.9 |
| **Kā Rūnaka** | 251.248 |
| **SJB Munro Family Trust** | 286.5 |
| **EN Schultz** | 305.144 |
| **WPGI** | 306.144 |
| **H Jansen** | 311.6 |
| **Submitter Name** | **Submission Point Number(s)** |
| **KO** | FS168 |
| **Survey Waitaki** | FS322 |
| **NZ Pork** | FS195 |

### 7.23.1 Submissions

290. NZTA [152.51], KiwiRail [233.74], CRC [271.406] and P & S Mitchell [302.331] support SUB-P16 and seek that the policy be retained as notified.

291. Hort NZ [166.40], NZ Pork [195.28], FFNZ [246.211] and EPFNZ & PIANZ [266.5] support SUB-P16 in part but seek amendments to clause 7 to require sufficient separation from primary production activities and to better manage reverse sensitivity effects and conflicts with existing and permitted activities.

292. Bog Roy Station [172.3] and Shelton Downs [193.14] seek amendments to provide more flexibility for subdivision in rural areas. The submitters consider requirements to avoid buildings or access points in prominent locations may be impractical and seek wording to manage or mitigate adverse visual effects instead.

293. Terramark [176.12] and FFNZ [246.211] seek amendments to the 20ha minimum lot size approach in the *General Rural Zone*. Terramark seeks provision of small lots between 0.5ha and 1ha where the residual parcel is at least 40ha and a consent notice manages future subdivision calculations.

294. FFNZ [246.211] seeks broader amendments to SUB-P16, including deleting or amending matters it considers relate to later land-use activities rather than subdivision. FFNZ seeks clarification on whether *Rural Zones* includes the *Rural Lifestyle Zone* and *Settlement Zone* and suggest SUB-P17 and SUB-P16 could be merged.

295. J Laurie (and others) [76.9] and H Jansen [311.6] considers that subdivision can be an offset for enhanced public access to ONL and ONF. Seeking to amend SUB-P16 as follows:

    Amend SUB-P16 'Subdivision in the Rural Zones' to align with the relief sought as follows:

    ...

    9. Enhances public access to outstanding natural features and landscapes, especially those deemed to be UNESCO Geopark sites.

296. Kā Rūnaka [251.248] considers amendments required to ensure subdivision provisions correctly reference Māori land and Native Reserves for consistency across the plan. Seeks to amend as follows:

    b. the subdivision occurs on Māori land or a ~~Māori~~ Native Reserve

297. SJB Munro Family Trust [286.5] Considers that SUB-P16 clause 8 to be attempting to give effect to the National Policy Statement on Highly Productive Land but extends its scope by applying restrictions to any land in the General Rural Zone. Considering that the clause will prohibits subdivision except those linked to a utility or Māori reserve, representing a highly restricted range of activities. Seeks amendments to be greater scope for subdivision to occur in the General Rural Zone on land that is not highly productive land.

298. EN Schultz [305.144] and WPGI [306.144] support SUB-P16 in part. Considering that subdivision in rural zones should support primary production values and protect identified landscape features and support for prioritising primary production values rather than relying on a fixed minimum lot size to achieve the rural zone intent.

### 7.23.2 Analysis

299. Support of NZTA [152.51], KiwiRail [233.74], CRC [271.406] and P & S Mitchell [302.331] for SUB-P16 as notified is acknowledged.

300. I acknowledge the concerns of Hort NZ [166.40], NZ Pork [195.28], FFNZ [246.211] and EPFNZ & PIANZ [266.5] regarding reverse sensitivity effects on primary production activities. However, clause 7 already requires sufficient separation from zone boundaries and transport networks to minimise reverse sensitivity effects and conflict with existing and permitted activities on adjoining sites. In my opinion, this provides appropriate policy direction without separately identifying primary production activities, which are already part of the anticipated rural environment.

301. I acknowledge Bog Roy Station [172.3] and Shelton Downs [193.14] consider the requirement to avoid buildings and access points in prominent locations may be too restrictive. However, SUB-P16 is intended to maintain rural character and amenity and to respond to prominent ridgelines, natural features and landforms. I consider the notified direction is appropriate at policy level and provides a clear outcome for subdivision design. Replacing avoid with a broader requirement to manage or mitigate visual effects would weaken that direction and provide less certainty.

302. In relation to Terramark [176.12] and FFNZ [246.211], I consider the notified 20ha minimum lot size approach forms part of the broader framework for limiting fragmentation of productive rural land. SUB-P16 specifically seeks to protect the productivity of land in the General Rural Zone by avoiding new sites below 20ha, subject to limited exceptions. I am not persuaded that providing for smaller lots of 0.5ha to 1ha, even where a larger balance lot is retained, would better achieve this outcome. Such an approach could increase fragmentation and create additional rural-residential expectations and reverse sensitivity effects.

303. I also acknowledge FFNZ's [246.211] broader concerns regarding the scope and structure of SUB-P16. While some matters addressed by the policy will influence later land-use activities, subdivision establishes the pattern, size and configuration of allotments and therefore directly affects the location and form of future development. I consider it appropriate for the policy to address these outcomes at subdivision stage.

304. In relation to the terminology used, SUB-P16 applies to the Rural Zones, and the notified wording expressly refers to the Rural Lifestyle Zone and General Rural Zone within its provisions. SUB-P17 separately addresses the Settlement Zone. I consider retaining separate policies for rural and settlement subdivision provides clearer direction and reflects the different anticipated character and development outcomes of those environments. I therefore do not consider merging SUB-P16 and SUB-P17 would improve the clarity or effectiveness of the chapter.

305. I acknowledge that subdivision can provide opportunities to improve public access to areas with important natural values as identified by J Laurie (and others) [76.9] and H Jansen [311.6]. However, I do not consider this should be a general requirement applying to rural subdivision. Public access is more appropriately considered where relevant to the particular site and proposal, including through the esplanade provisions where applicable. I therefore do not recommend the amendment sought.

306. Kā Rūnaka [251.248] seeks amendment to clause 8 of SUB-P16 to refer consistently to Māori land and Native Reserves. However, clause 8 has subsequently been withdrawn from the PDP and is no longer being progressed. Accordingly, the specific amendment

sought is no longer relevant to SUB-P16 and I do not recommend any amendment in response to this submission. I nevertheless note that the Mana Whenua s42A report recommends introducing a broader definition of Māori land and making consequential amendments to relevant PDP provisions to reflect that definition.

307. SJB Munro Family Trust [286.5] raises concerns that clause 8 would unduly restrict subdivision throughout the General Rural Zone, including land that is not highly productive land. As clause 8 of SUB-P16 and the relevant General Rural Zone provisions have subsequently been withdrawn from the PDP, the provision giving rise to the submitter's concern is no longer being progressed. I therefore do not consider any amendment to SUB-P16 is required in response to this submission.

308. E Schultz [305.144] and WPGI [306.144] support SUB-P16 in part and seek an approach that gives greater recognition to primary production values and identified landscape features rather than relying solely on minimum allotment size. I acknowledge the outcomes sought. However, to the extent that the submissions relate to the withdrawn General Rural Zone framework and clause 8, those matters are no longer relevant to the remaining PDP provisions. For the remaining parts of SUB-P16, I consider the policy continues to provide appropriate direction for subdivision within the Rural Zones, including maintaining rural character and responding to relevant site and landscape characteristics.

### 7.23.3 Recommendations

309. I recommend no changes to SUB-P16.

### 7.23.4 Evaluation

310. No further evaluation is required.

## 7.24 Subdivision – SUB-P17

311. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, one original submission point and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **FFNZ** | 246.212 |

### 7.24.1 Submissions

312. FFNZ [246.212] opposes SUB-P17 and seeks for the policy to be deleted. The NPStds indicate that 'Rural Zones' include GRUZ, RLZ and the Settlement Zone (Section 4, Table 4). As SUB-16 addresses the Rural Zone, SUB-17 is unnecessary and should be deleted. Clause 2 could be incorporated in SUB-16 if necessary.

### 7.24.2 Analysis

313. I acknowledge FFNZ's [246.212] submission that SUB-P17 is unnecessary because the NPStds identifies the Settlement Zone as a Rural Zone. However, I do not consider that classification requires all subdivision outcomes for those zones to be addressed through a single policy.

314. SUB-P16 and SUB-P17 perform different functions within the subdivision framework. SUB-P16 provides more detailed direction for subdivision within the General Rural and Rural Lifestyle environments, whereas SUB-P17 provides specific direction for subdivision within the Settlement Zone. Retaining a separate policy enables the subdivision framework to respond to the particular character and anticipated development pattern of settlements, notwithstanding their broader classification as a Rural Zone.

315. Incorporating clause 2 of SUB-P17 into SUB-P16 would therefore reduce the distinction between the subdivision outcomes sought for the different zones and would not, in my opinion, improve the clarity or effectiveness of the policy framework. I consider SUB-P17 should be retained as notified.

### 7.24.3 Recommendations

316. I recommend no change to SUB-P17.

### 7.24.4 Evaluation

317. No further evaluation is required.

## 7.25 Subdivision – SUB-R1

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

| Submitter Name | Submission Point Number(s) |
|---|---|
| **FENZ 2** | 163.49 |
| **Terramark** | 176.13 |
| **FFNZ** | 246.213 |
| **CRC** | 271.407 |
| **E Schultz** | 305.145 |
| **WPG 2** | 306.145 |
| **Further Submitter Name** | **Further Submission Point Number(s)** |
| **Survey Waitaki** | FS322 |

### 7.25.1 Submissions

319. FENZ 2 [163.49], CRC [271.407], E Schultz [305.145] and WPG 2 [306.145] support SUB-R1 and seek that the rule be retained as notified.

320. Terramark [176.13] supports SUB-R1 in part but seeks amendments to provide exceptions to the 20ha minimum lot size for boundary adjustments. Terramark also seeks provision for small lots between 0.5ha and 1ha where the residual parcel is at least 40ha and a consent notice manages future subdivision calculation.

321. FFNZ [246.213] supports boundary adjustment being a controlled activity, however FFNZ seeks amendments so minimum lot size requirements do not apply to boundary adjustments in the GRU and supports a restricted discretionary pathway where controlled activity conditions are not met.

### 7.25.2 Analysis

322. Support of FENZ 2 [163.49], CRC [271.407], E Schultz [305.145] and WPG 2 [306.145] for SUB-R1 as notified is acknowledged.

323. I acknowledge Terramark's [176.13] and FFNZ's [246.213] concerns regarding the application of minimum allotment sizes to boundary adjustments in the General Rural Zone. However, boundary adjustments can alter the size and configuration of existing allotments and potentially increase the extent of fragmentation where minimum allotment sizes are not maintained. I therefore consider it appropriate that the controlled activity pathway remains subject to the notified minimum allotment size requirements.

324. I also acknowledge Terramark's [176.13] request to enable allotments between 0.5ha and 1ha where the balance allotment is at least 40ha. This would represent a substantive departure from the notified 20ha minimum allotment size framework and could facilitate additional small rural allotments and associated fragmentation and development expectations. For the reasons discussed in relation to SUB-P16, I do not consider this approach would better achieve the intended subdivision outcomes for the General Rural Zone.

325. In relation to FFNZ's [246.213] request for a restricted discretionary pathway where the controlled activity standards are not met, I consider the activity status applying to non-compliance should reflect the potentially broader effects associated with subdivision that does not satisfy the standards for a controlled activity. The notified framework appropriately enables those matters to be assessed through the applicable consent pathway, and I do not consider a restricted discretionary pathway is necessary.

### 7.25.3 Recommendations

326. I recommend no changes to SUB-R1.

### 7.25.4 Evaluation

327. No further evaluation is required.

## 7.26 Subdivision – SUB-R2

328. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, one original submission points and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **CRC** | 271.408 |

### 7.26.1 Submissions

329. CRC [271.408] generally supports SUB-R2 and seeks that the rule be retained as notified.

### 7.26.2 Analysis

330. Support from CRC [271.408] for SUB-R2 is acknowledged.

### 7.26.3 Recommendations

331. I recommend no change to SUB-R2.

### 7.26.4 Evaluation

332. No further evaluation is required.

## 7.27 Subdivision – SUB-R3

333. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, three original submission points and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **Telcos** | 244.91 |
| **CRC** | 271.409 |
| **Network Waitaki** | 288.70 |

### 7.27.1 Submissions

334. Telcos [244.91] support SUB-R3 but seeks amendments to remove reference to *legal mechanisms* from the matter of discretion.

335. CRC [271.409] and Network Waitaki [288.70] support SUB-R3 and seek that the rule be retained as notified.

### 7.27.2 Analysis

336. Support of CRC [271.409] and Network Waitaki [288.70] for SUB-R3 as notified is acknowledged.

337. I acknowledge Telcos [244.91] request to remove reference to legal mechanisms from the relevant matter of discretion. However, I consider legal mechanisms can be relevant to ensuring that infrastructure and servicing arrangements established through subdivision are appropriately secured and maintained over time. Retaining this matter also provides flexibility as to the particular mechanism that may be appropriate for an individual subdivision.

338. In my opinion, removing reference to legal mechanisms could unnecessarily constrain the matters able to be considered where an enduring arrangement is required to support servicing or infrastructure outcomes. I therefore consider SUB-R3 should be retained as notified.

### 7.27.3 Recommendations

339. I recommend no change to SUB-R3.

### 7.27.4 Evaluation

340. No further evaluation is required.

## 7.28 Subdivision – SUB-R4

341. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, 11 original submission points and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **FENZ 2** | 163.50 |
| **Hort NZ** | 166.41 |
| **Shelton Downs** | 193.15 |
| **NZ Pork** | 195.29 |
| **Telcos** | 244.92 |
| **CRC** | 271.410 |
| **E Schultz** | 305.146 |
| **WPG 2** | 306.146 |
| **WDC** | 83.28 |
| **FFNZ** | 246.214 |
| **Kā Rūnaka** | 251.249 |

### 7.28.1 Submissions

342. FENZ 2 [163.50], Telcos [244.92] and CRC [271.410] support SUB-R4 and seek that the rule be retained as notified.

343. Hort NZ [166.41] and NZ Pork [195.29] support SUB-R4 in part but seek an additional matter of control addressing measures to avoid adverse effects on existing and permitted primary production activities.

344. Shelton Downs [193.15], E Schultz [305.146] and WPG 2 [306.146] seek a more enabling default activity status where standards are not met. Shelton Downs seeks discretionary activity status rather than non-complying activity status where minimum allotment size and dimension requirements are not met. E Schultz and WPG 2 support retaining the current rule framework if SUB-S1 is amended or alternatively they seek discretionary activity status where compliance with CON-1(1) is not achieved.

345. Kā Rūnaka [251.253] [2] opposes SUB-R4 and considers that the subdivision rules are too onerous for Kāi Tahu land set aside for settlement purposes. The submitter seeks that SUB-R4 be amended to:

- Remove the application of CON-2 in the General Rural; and
- Zone to Māori land and Native Reserves; and
- Remove the application of SUB-S1 to Māori land and Native Reserves.

346. Kā Rūnaka [251.249] considers that the subdivision rules are overly onerous for whenua set aside for Kāi Tahu settlement purposes, with fully discretionary or non-complying activity status and SUB-S1 site size requirements for papakāika development failing to provide an enabling consenting framework or give effect to the operative PORPS provisions, including MW-P4 and MW-M5(2), particularly in the General Rural Zone and overlay areas. Considers also that the CON-2 requirements in SUB-R4 and SUB-R5 relating to highly productive land are inappropriate, as they do not recognise or give effect to the NPS-Highly Productive Land provisions for specified Māori land. Seeking to amend SUB-R4, SUB-R5 to:

    1. remove the application of CON-2 in the General Rural Zone to Māori land and Native Reserves

    2. remove the application of SUB-S1 to Māori land and Native Reserves

    Seeks to make any other amendments to rules and standards as necessary to enable subdivision of Māori land and Native Reserves by Kāi Tahu.

    FFNZ [246.214] support a controlled activity pathway for creating vacant lots in the GRUZ and request reverse sensitivity measures be added to the matters of control. Opposing making subdivisions that fail CON 1(1) or CON 2, or any subdivision of HPL, non-complying, as this removes reasonable land use options for farmers. Smaller lot subdivision may be needed where parts of a farm are uneconomic, and the NPS HPL already provides circumstances where subdivision can be considered. They seek rural subdivision under 20 ha to be a restricted discretionary activity, with clear matters of discretion, as the effects are identifiable and do not justify a discretionary or non-complying status.

[2] Summary of submissions identified submission point against SUB-R12 only.

WDC [83.28] seeks to relax activity status for GRUZ subdivisions that comply with standards but are within HPL, provided applicants demonstrate that productive capacity is maintained. Amendments to SUB-R4 include:

...

1. the matters of discretion listed in SUB-S3.

RDIS-3

Compliance is not achieved with CON-2.

Matters of discretion are restricted to:

1. that it can be demonstrated that the overall productive capacity of the subject land will be retained over the long term.

### 7.28.2 Analysis

324. Support of FENZ 2 [163.50], Telcos [244.92] and CRC [271.410] for SUB-R4 as notified is acknowledged.

325. Hort NZ [166.41] and NZ Pork [195.29] seek an additional matter of control addressing measures to avoid adverse effects on existing and permitted primary production activities. I acknowledge that subdivision can give rise to reverse sensitivity effects on primary production activities and that these effects may warrant consideration in rural environments.

326. However, the notified General Rural Zone provisions have subsequently largely been withdrawn, the matters of control retained within the PDP subdivision framework are therefore limited to those necessary to address natural hazard matters. In this context, I do not consider it appropriate to introduce an additional matter of control relating specifically to primary production activities through SUB-R4.

327. The ODP provisions will continue to provide the applicable framework for managing subdivision and associated effects within the General Rural Zone. Adding a new matter of control to SUB-R4 in isolation would create an unnecessary overlap between the operative and proposed plan frameworks and would not provide a coherent approach to managing rural subdivision. I therefore consider the additional matter of control sought by Hort NZ and NZ Pork is unnecessary.

328. I acknowledge Shelton Downs' [193.15], E Schultz and WPG 2 request for more enabling activity status rather than non-complying activity status where minimum allotment size and dimension requirements are not met. These standards implement the anticipated subdivision pattern and density for the relevant zones. I consider non-complying activity status appropriately signals that subdivision which does not achieve these fundamental standards is not generally anticipated, while still enabling proposals to be considered on their merits.

329. Kā Rūnaka [251.253] and [251.249] seek amendments to SUB-R4 and SUB-R5 to provide a more enabling subdivision framework for Māori land and Native Reserves, including by removing the application of CON-2 and SUB-S1 within the General Rural Zone. I

acknowledge the concerns raised regarding the need for the subdivision framework to appropriately enable the use and development of Māori land and Native Reserves. The Mana Whenua s42A report similarly recommends a broader definition of Māori land and consequential amendments to the PDP to better recognise Māori land and Native Reserves. However, following the withdrawal of the General Rural Zone provisions, SUB-R4 has been substantially amended so that its remaining General Rural Zone requirements relate to subdivision within the Otago and Waitaki River Flood Assessment Overlays and Canterbury Flood Assessment Overlay. The application of SUB-S1 and CON-2, including the highly productive land requirements, has been withdrawn. The General Rural Zone component of SUB-R5 has also been withdrawn. Accordingly, the specific restrictions that Kā Rūnaka seeks to remove no longer apply, and I do not recommend further amendments to SUB-R4 or SUB-R5 in response to these submission points. The remaining application of SUB-R4 in the General Rural Zone appropriately addresses natural hazard risk irrespective of land ownership.

330. FFNZ [246.214] supports a controlled activity pathway for vacant allotment subdivision in the General Rural Zone, seeks additional reverse sensitivity matters of control, and opposes the notified discretionary and non-complying pathways for subdivision below 20ha or involving highly productive land. The notified General Rural Zone framework has subsequently been substantially withdrawn. The remaining SUB-R4 provisions applying in the General Rural Zone are limited to the natural hazard standards in SUB-S2 and SUB-S3, while the minimum allotment size, other subdivision standards and HPL-related CON-2 have been withdrawn. Accordingly, the provisions giving rise to FFNZ's concerns regarding minimum allotment size, HPL and the associated non-complying activity status are no longer being progressed. I do not consider it appropriate to introduce reverse sensitivity matters into the remaining controlled activity pathway, which is now directed specifically toward managing natural hazard effects. I therefore do not recommend further amendment in response to FFNZ [246.214].

331. WDC [83.28] seeks a restricted discretionary pathway where subdivision within the General Rural Zone does not comply with CON-2, subject to demonstrating that the overall productive capacity of the land will be retained over the long term. CON-2 and its associated non-complying activity pathway have subsequently been withdrawn from the General Rural Zone provisions of SUB-R4. The specific issue raised by WDC therefore no longer arises and I do not recommend the amendment sought.

### 7.28.3 Recommendations

332. I recommend no change to SUB-R4:

### 7.28.4 Evaluation

333. No further evaluation is required.

## 7.29 Subdivision – SUB-R5

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

to each point is provided in full in **Appendix 2**. Overall, nine original submission points and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **FENZ 2** | 163.51 |
| **KO** | 168.6 |
| **Telcos** | 244.93 |
| **CRC** | 271.411 |
| **E Schultz** | 305.147 |
| **WPG 2** | 306.147 |
| **FFNZ** | 246.215 |
| **Kā Rūnaka** | 251.250 |
| **WDC** | 83.29 |

### 7.29.1 Submissions

335. FENZ 2 [163.51], Telcos [244.93] and CRC [271.411] support SUB-R5 and seek that the rule be retained as notified.

336. KO [168.6] supports SUB-R5 in part, including the controlled activity status across all zones but seeks removal of minimum allotment size and dimensions requirements. KO considers relevant bulk and location standards will manage effects and ensure appropriate subdivision outcomes.

337. E Schultz [305.147] and WPG 2 [306.147] support enabling subdivision around existing lawfully established buildings, subject to amended standards sought elsewhere in their submissions. The submitters support the controlled activity status for straightforward rural subdivisions where standards are met but seek discretionary activity status where compliance with CON-1(1) is not achieved.

338. Kā Rūnaka [251.253][3] and [251.250] opposes SUB-R5 and considers that the subdivision rules are too onerous for Kāi Tahu land set aside for settlement purposes. Considering that the subdivision consenting regime inappropriate for Māori land and Native Reserves. The submitter considers that easing requirements is essential to enable Kāi Tahu development consistent with the PORPS. The submitter seeks that SUB-R5 be amended to:

- Remove the application of CON-2 in the General Rural; and
- Zone to Māori land and Native Reserves; and
- Remove the application of SUB-S1 to Māori land and Native Reserves.

339. FFNZ [246.215] support SUB-R5 in part, supporting a controlled-activity pathway for subdivision around existing lawfully established buildings in the GRUZ where no new vacant lots are created. For subdivisions that do not meet CON-1(2)–(7), FFNZ consider that the effects are well understood and can be clearly listed, so a restricted

[3] Summary of submissions identified submission point against SUB-R12 only.

discretionary status is more appropriate than discretionary. This would give landowners and the Council greater certainty and efficiency.

340. WDC [83.29] seeks for a relaxation of activity status for subdivision within the General Rural Zone, around existing dwellings that comply with the relevant standards but are on HPL, provided long term productivity can be demonstrated. Amendments to SUB-R5 include the following:

...

Compliance is not achieved: Restricted Discretionary

Where:

RDIS-1

Compliance is not achieved with CON-2.

Matters of discretion are restricted to:

1. That it can be demonstrated that the overall productive capacity of the subject land will be retained over the long term

Activity status when compliance is not achieved: Discretionary

Where:

DIS-1

Compliance is not achieved with CON-1(2)-(7)

Activity status when compliance is not achieved: Non-Complying

Where:

NC-1

Compliance is not achieved with CON-1(1)

Where:

NC-2

Compliance is not achieved withRDIS-1~~CON-2~~

### 7.29.2 Analysis

341. I acknowledge KO's [168.6] support for controlled activity status but do not agree that the minimum allotment size and dimension requirements should be removed. While the relevant bulk and location standards will manage the effects of subsequent built development, they perform a different resource management function from subdivision standards. Bulk and location standards principally manage the scale, form and location of buildings and associated effects such as dominance, privacy, outlook, access to sunlight and amenity. They do not determine whether the underlying allotment created through subdivision is of an appropriate size, shape and configuration.

342. Minimum allotment size and dimension requirements instead manage the pattern of subdivision itself. They assist in ensuring that allotments created around existing lawfully established buildings have sufficient area and dimensions to accommodate the existing development and associated access, servicing and outdoor areas, while maintaining an

appropriate relationship with adjoining allotments. They also ensure that subdivision does not create unusually small, constrained or irregular allotments that may generate pressure for subsequent development inconsistent with the anticipated subdivision pattern of the zone.

343. I therefore do not consider that compliance with bulk and location standards provides an appropriate substitute for minimum allotment size and dimension requirements. Both perform complementary but distinct functions: the former primarily manages the effects of built form, while the latter manages the size, configuration and pattern of landholdings established through subdivision. I consider retaining these requirements as part of the controlled activity pathway is appropriate.

344. I acknowledge Kā Rūnaka's [251.253 and 251.250] concern that the requirements of SUB-R5 may be unnecessarily restrictive for subdivision of Māori land and Native Reserves, particularly where that land is intended to provide for Kāi Tahu settlement and papakāika. I also acknowledge that the relief seeks to recognise the particular circumstances of this land through exemptions from CON-2 and SUB-S1.

345. However, the General Rural Zone provisions of the PDP have subsequently been withdrawn, with the relevant ODP provisions continuing to apply. In this context, I do not consider it appropriate to amend SUB-R5 to provide a specific exemption from CON-2 for Māori land and Native Reserves within the General Rural Zone. The proposed exemption would relate to a subdivision framework that will no longer operate in the manner anticipated when the submission was lodged.

346. I also do not consider it appropriate to provide a general exemption from SUB-S1 for Māori land and Native Reserves through SUB-R5. Minimum allotment size and dimension requirements perform an important subdivision function by managing the size, configuration and pattern of allotments. Removing those requirements altogether would provide no alternative parameters for determining an appropriate subdivision pattern or ensuring that resulting allotments are suitable for their intended use.

347. I nevertheless acknowledge the underlying concern raised by Kā Rūnaka regarding the ability to develop Māori land and Native Reserves for papakāika and settlement purposes. The PDP includes a specific papakāika framework intended to provide for the social, cultural, environmental and economic needs and wellbeing of mana whenua, including development pathways for Māori land. In my opinion, a more enabling subdivision pathway for these purposes is better addressed through provisions specifically designed for papakāika and Māori land, rather than through broad exemptions from the generally applicable standards in SUB-R5.

348. I therefore do not recommend the amendments to SUB-R5 sought by Kā Rūnaka. This does not diminish the importance of enabling Kāi Tahu settlement and papakāika development, but instead reflects the withdrawal of the General Rural Zone provisions and the need for any more enabling subdivision pathway to be integrated coherently with the PDP provisions specifically addressing Māori land and papakāika.

349. FFNZ [246.215] supports the controlled activity pathway for subdivision around existing lawfully established buildings in the General Rural Zone and seeks restricted

discretionary, rather than discretionary, activity status where the relevant standards are not met. However, the General Rural Zone component of SUB-R5 has subsequently been withdrawn from the PDP. The remaining rule applies to all zones except the General Rural Zone. Accordingly, the activity status framework to which FFNZ's relief relates is no longer being progressed and I do not recommend any amendment to SUB-R5 in response to this submission.

350. WDC [83.29] seeks a restricted discretionary pathway for subdivision around existing buildings in the General Rural Zone where the site is highly productive land, provided the long-term productive capacity of the land can be retained. As with FFNZ [246.215], the General Rural Zone component of SUB-R5, including the associated highly productive land and activity status provisions, has subsequently been withdrawn. The issue identified by WDC therefore no longer arises under SUB-R5 and I do not recommend the amendment sought.

### 7.29.3 Recommendations

351. I recommend no change to SUB-R5.

### 7.29.4 Evaluation

352. No further evaluation is required.

## 7.30 Subdivision – SUB-R6

353. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, three original submission points and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **Shelton Downs** | 193.16 |
| **Hollamby Trust** | 252.62 |
| **CRC** | 271.412 |

### 7.30.1 Submissions

354. CRC [271.412] supports SUB-R6 and seeks that the rule be retained as notified.

355. Shelton Downs [193.16] seeks amendments to SUB-R6, so the matters of control include the location of building platforms thereby enabling building platforms to be located outside of the Liquefaction Assessment Overlay where possible.

356. Hollamby Trust [252.62] supports controlled activity status for SUB-R6 in part but is concerned about the cost of requiring a geotechnical report where there has been no consultation or site-specific groundwork to justify the liquefaction mapping. Hollamby Trust seeks that a geotechnical report only be required where this information has not

already been provided as part of the justification for the Liquefaction Assessment Overlay on the PDP maps.

### 7.30.2 Analysis

357. Support of CRC [271.412] for SUB-R6 as notified is acknowledged.

358. I acknowledge Shelton Downs' [193.16] request that the matters of control expressly include the location of building platforms, with a preference for locating building platforms outside of the Liquefaction Assessment Overlay where possible. I agree that the location of future building platforms may be relevant when considering liquefaction risk at subdivision stage. However, the purpose of the Liquefaction Assessment Overlay is to identify land where further assessment of liquefaction susceptibility is required, rather than to establish that development within the Overlay is necessarily inappropriate. I therefore do not consider that the policy framework should create a preference for locating building platforms outside of the Overlay without first considering the site-specific level of risk and appropriate mitigation.

359. I also acknowledge Hollamby Trust's [252.62] concern regarding the cost of requiring a geotechnical report where sufficient site-specific information may already be available. However, the identification of land within the Liquefaction Assessment Overlay does not necessarily provide the site-specific information required to determine the susceptibility of individual allotments to liquefaction or the implications for their subdivision and future development. The purpose of the geotechnical assessment required by SUB-R6 is to provide more detailed assessment at the time subdivision is proposed.

360. Where existing geotechnical information is sufficiently detailed and relevant to the particular site and proposed subdivision, it may be capable of informing the assessment without unnecessary duplication of investigative work. However, I do not consider that information prepared to justify the spatial extent of the Liquefaction Assessment Overlay should automatically remove the requirement for an appropriately scoped geotechnical assessment of the proposed subdivision. The notified requirement provides greater certainty that liquefaction risk is understood and appropriately addressed before new allotments are created.

### 7.30.3 Recommendations

361. I recommend no change to SUB-R6.

### 7.30.4 Evaluation

362. No further evaluation is required.

## 7.31 Subdivision – SUB-R7

363. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, two original submission points and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **CRC** | 271.413 |
| **Transpower** | 309.105 |

### 7.31.1 Submissions

364. CRC [271.413] supports SUB-R7 and seeks that the rule be retained as notified.

365. Transpower [309.105] opposes SUB-R7 as they consider buffers are unnecessary in the Waitaki District and seeks to delete the provision.

### 7.31.2 Analysis

366. Support of CRC [271.413] for SUB-R7 as notified is acknowledged.

367. I acknowledge Transpower's [309.105] submission that the buffer requirements in SUB-R7 are unnecessary in the Waitaki District and its request that the rule be deleted. I agree with the relief sought. The purpose of the rule is to manage subdivision in proximity to the National Grid (Electricity Transmission Network). However, where the particular infrastructure circumstances giving rise to the prescribed buffer requirements are not present within the District, retaining the rule would impose an unnecessary regulatory requirement without a corresponding resource management benefit.

368. I also consider that deletion of SUB-R7 does not remove the wider protection afforded to the National Grid through the subdivision framework. In particular, SUB-P7 provides specific policy direction for subdivision within the National Grid Corridor (Electricity Transmission Network Grid Corridor), including the amendments recommended in response to Transpower [309.104] to expressly address reverse sensitivity effects and continued and reasonable access to transmission assets. This provides an appropriate framework for managing subdivision where interaction with the National Grid (Electricity Transmission Network) does arise.

### 7.31.3 Recommendations

369. I recommend that rule SUB-R7 be deleted.

### 7.31.4 Evaluation

370. The recommended deletion of SUB-R7 creates an efficient plan, while maintaining the effectiveness of the subdivision provisions relating to the National Grid (Electricity Transmission Network). The prescribed buffer requirements are not necessary in the Waitaki District, and the National Grid will continue to be appropriately managed through SUB-P7 and the remaining relevant provisions, including the recommended amendments addressing reverse sensitivity effects and continued and reasonable access to transmission assets.

371. Deleting SUB-R7 avoids unnecessary regulatory and assessment requirements where the circumstances requiring the prescribed buffers do not arise. This provides an administrative and economic benefit without creating material environmental, social or

cultural costs. The amendment also improves the clarity of the PDP by removing a rule that has no practical application within the Waitaki District. I therefore consider deletion of SUB-R7 to be a more efficient and effective means of achieving the relevant PDP objectives and the most appropriate provision under section 32.

## 7.32 Subdivision – SUB-R8

372. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, three original submission points and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **PowerNet** | 197.61 |
| **CRC** | 271.414 |
| **Network Waitaki** | 288.71 |

### 7.32.1 Submissions

373. CRC [271.414] supports SUB-R8 and seeks that the rule be retained as notified.

374. PowerNet [197.61] supports SUB-R8 in part but seeks amendments to ensure the rule applies to the relevant owner or operator of the electricity distribution asset.

375. Network Waitaki [288.71] supports SUB-R8 but seeks minor amendments as follows:

...

Where:

RDIS-1

Any identified building platform is located outside the Electricity Distribution Yard but within the Electricity Distribution Corridor.

All resulting allotments, except allotments for access or a public work, demonstrate that any identified building platform is located outside of the Electricity Distribution Corridor Yard.

### 7.32.2 Analysis

376. Support of CRC [271.414] for SUB-R8 as notified is acknowledged.

377. I acknowledge PowerNet's [197.61] request that SUB-R8 apply to the relevant owner or operator of the electricity distribution asset. I consider this amendment appropriate. Referring to the relevant owner or operator ensures the rule applies appropriately irrespective of which network utility provider owns or operates the relevant infrastructure and provides clearer and more enduring drafting.

378. I also agree with Network Waitaki [288.71] that RDIS-1 would benefit from clarification. The notified wording focuses on an identified building platform being located outside the

Electricity Distribution Yard but within the Electricity Distribution Corridor. The amendment sought would more clearly establish the intended outcome that, except for allotments for access or a public work, each resulting allotment demonstrates that any identified building platform is located outside of the Electricity Distribution Yard.

379. I consider this is an appropriate matter to address at subdivision stage. The location and configuration of allotments and associated building platforms can determine the proximity of subsequent development to electricity distribution infrastructure. Requiring an identified building platform outside of the Electricity Distribution Yard provides greater certainty that each resulting allotment can accommodate future development without creating unnecessary constraints on the safe and efficient operation, maintenance and access to the electricity distribution network.

380. The exclusion for allotments created for access or a public work is also appropriate, as these allotments are not ordinarily created to accommodate buildings and requiring a complying building platform would serve no practical purpose.

### 7.32.3 Recommendations

381. I recommend the following changes to SUB-R8:

SUB-R8 Subdivision creating an allotment within an Electricity Distribution Corridor

All zones (including the withdrawn General Rural Zone)

Activity status: Restricted Discretionary Where:
RDIS-1
All resulting allotments, except allotments for access or pubic work demonstrate that ~~A~~ any identified building platform is located outside the Electricity Distribution Yard ~~but within the Electricity Distribution Corridor.~~
*Note: This rule applies in addition to any other applicable Subdivision Rules*.
Matters of discretion are restricted to:
1. the matters in INF-P5.

Activity status when compliance is not achieved: Non-Complying
Where:
NC-1
1. Compliance is not achieved with RDIS-1

***Notification:***
*An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.*
*Notice of any application for resource consent under this rule must be served on the Electricity Distribution Network company who owns and operates the line ~~Network Waitaki Limited~~ in accordance with Clause 10(2) of the Resource Management (Forms, Fees, and Procedure) Regulations 2003.*

### 7.32.4 Evaluation

382. The recommended amendments to SUB-R8 improve the effectiveness of the rule by clarifying that it applies to the relevant owner or operator of electricity distribution

infrastructure and that resulting allotments intended to accommodate development provide an identified building platform outside of the Electricity Distribution Yard. This better supports the relevant subdivision and infrastructure objectives by reducing the potential for future development to conflict with electricity distribution infrastructure.

383. The amendments are efficient as they provide greater certainty for applicants, infrastructure providers and decision-makers without materially increasing the regulatory burden associated with subdivision. The principal benefits are the improved protection of electricity distribution infrastructure and reduced potential for future land-use conflict, while the exclusion for access and public work allotments avoids imposing requirements where a building platform would serve no practical purpose. I do not anticipate material additional environmental, economic, social or cultural costs.

384. I consider the amendments are a more efficient and effective means of achieving the relevant PDP objectives and are the most appropriate provisions under s32. This further evaluation is proportionate to the relatively minor scale and significance of the changes, consistent with s32AA.

## 7.33 Subdivision – SUB-R9

385. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, two original submission points and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **CRC** | 271.415 |
| **Transpower** | 309.106 |

### 7.33.1 Submissions

386. CRC [271.415] and Transpower [309.106] support SUB-R9 and seek that the rule be retained as notified.

### 7.33.2 Analysis

387. Support from CRC [271.415] and Transpower [309.106] for SUB-R9 is acknowledged.

### 7.33.3 Recommendations

388. I recommend no change to SUB-R9.

### 7.33.4 Evaluation

389. No further evaluation is required.

## 7.34 Subdivision – SUB-R12

390. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, three original submission points and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **Kā Rūnaka** | 251.253 |
| **CRC** | 271.418 |
| **Meridian** | 294.84 |

### 7.34.1 Submissions

391. CRC [271.418] and Meridian [294.84] support SUB-R12 and seek that the rule be retained as notified.

392. Kā Rūnaka [251.253] opposes SUB-R12 and considers that the subdivision rules are too onerous for Kāi Tahu land set aside for settlement purposes. The submitter seeks amendments to provide a more enabling status for subdivision on Kāi Tahu Maori land and Native Reserves.

### 7.34.2 Analysis

393. Support of CRC [271.418] and Meridian [294.84] for SUB-R12 as notified is acknowledged.

394. I acknowledge Kā Rūnaka's [251.253] concern that the activity status applying under SUB-R12 may impose an unnecessarily onerous consenting pathway for the subdivision of Māori land and Native Reserves by Kāi Tahu. The submission identifies that these lands have particular significance for enabling settlement and papakāika development and seeks a more enabling subdivision pathway. The PDP itself recognises Native Reserves as places of particular historical and ancestral association for Kāi Tahu.

395. I recognise the importance of enabling Kāi Tahu to use and develop Māori land and Native Reserves for settlement purposes. However, SUB-R12 applies where subdivision does not meet the requirements necessary to qualify for the more enabling activity pathways elsewhere in the chapter. A more enabling activity status should not apply solely on the basis of land ownership or status where the subdivision may also engage other resource management matters that require assessment.

396. I also note that the PDP contains a specific Papakāika framework intended to provide for the social, cultural, environmental and economic needs and wellbeing of mana whenua, including pathways for development on Māori land. In my opinion, any additional enabling provisions specifically for subdivision associated with papakāika or Kāi Tahu settlement are more appropriately considered as part of that integrated framework rather than through a general relaxation of SUB-R12.

397. I therefore consider the activity status in SUB-R12 should be retained as notified. This does not diminish the significance of Māori land or Native Reserves, but ensures that where subdivision falls within SUB-R12, the relevant effects and circumstances of the proposal can be appropriately considered through the resource consent process.

### 7.34.3 Recommendations

398. I recommend no changes to SUB-R12.

### 7.34.4 Evaluation

399. No further evaluation is required.

## 7.35 Subdivision – SUB-R15

400. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, three original submission points and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **Kā Rūnaka** | 251.256 |
| **E Schultz** | 305.152 |
| **WPG 2** | 306.152 |

### 7.35.1 Submissions

401. E Schultz [305.152] and WPG 2 [306.152] support SUB-R15 and seek that the rule be retained as notified.

402. Kā Rūnaka [251.256] opposes SUB-R15 and considers that the subdivision rules are too onerous for Kāi Tahu land set aside for settlement purposes. The submitter seeks amendments to provide a more enabling status for subdivision on Kāi Tahu Maori land and Native Reserves.

### 7.35.2 Analysis

403. The support of E Schultz [305.152] and WPG 2 [306.152] for SUB-R15 as notified is acknowledged.

404. I acknowledge Kā Rūnaka's [251.256] concern that the activity status applying under SUB-R12 may impose an unnecessarily onerous consenting pathway for subdivision of Māori land and Native Reserves by Kāi Tahu. The submission identifies that these lands have particular significance for enabling settlement and papakāika development and seeks a more enabling subdivision pathway. The PDP itself recognises Native Reserves as places of particular historical and ancestral association for Kāi Tahu.

405. I recognise the importance of enabling Kāi Tahu to use and develop Māori land and Native Reserves for settlement purposes. However, SUB-R15 applies to subdivision within the

Moeraki Land Instability Overlay which requires a comprehensive assessment of potential effects given the natural hazard risk. A more enabling activity status should not apply solely on the basis of land ownership or status where the subdivision may also engage other resource management matters that require assessment.

406. I also note that the PDP contains a specific papakāika framework intended to provide for the social, cultural, environmental and economic needs and wellbeing of mana whenua, including pathways for development on Māori land. In my opinion, any additional enabling provisions specifically for subdivision associated with papakāika or Kāi Tahu settlement are more appropriately considered as part of that integrated framework rather than through a general relaxation of SUB-R15.

407. I therefore consider the activity status in SUB-R15 should be retained as notified. This does not diminish the significance of Māori land or Native Reserves, but ensures that where subdivision falls within SUB-R15, the relevant effects and circumstances of the proposal can be appropriately considered through the resource consent process.

### 7.35.3 Recommendations

408. I recommend no changes to SUB-R15.

### 7.35.4 Evaluation

409. No further evaluation is required.

## 7.36 Subdivision – SUB-R16

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

| Submitter Name | Submission Point Number(s) |
|---|---|
| **CRC** | 271.420 |
| **E Schultz** | 305.153 |
| **WPG 2** | 306.153 |
| **Further Submitter Name** | **Further Submission Point Number(s)** |
| **NHCTTA** | FS153 |

### 7.36.1 Submissions

411. E Schultz [305.153] and WPG 2 [306.153] support SUB-R16 and seek that the rule be retained as notified.

412. CRC [271.420] seeks amendments to the wording of SUB-R16 to remove *fault avoidance zone* and that the use of *buildings and structures* is *50m* rather than *20m* for consistency with Policy NH-P9.

### 7.36.2 Analysis

413. Support of E Schultz [305.153] and WPG 2 [306.153] for SUB-R16 as notified is acknowledged.

414. CRC [271.420] seeks amendments to SUB-R16 to align the terminology and setback requirement with the amendments it seeks to NH-P9. I acknowledge CRC's concern regarding the term fault avoidance zone and agree that consistent terminology between the Natural Hazards and Subdivision Chapters is desirable. CRC has similarly sought amendments to NH-P9 to refer to a mapped zone of fault deformation, rather than a fault avoidance zone.

415. I therefore consider that the terminology used in SUB-R16 should be amended consequentially to remain consistent with the recommendations made in relation to NH-P9. Using the same terminology across the relevant policy and rule will improve the clarity and administration of the PDP and avoid uncertainty as to whether the provisions are referring to different spatial areas.

416. I also consider there is merit in aligning the setback specified in SUB-R16 with the corresponding direction in NH-P9. Where NH-P9 establishes the policy direction for managing subdivision and future development in relation to fault deformation, the implementing subdivision rule should apply a consistent setback. A difference between the distances specified in the policy and rule would create uncertainty and potentially result in the rule enabling an outcome that does not achieve the policy direction.

417. Subject to consistency with the recommendations made on NH-P9, I therefore recommend amending SUB-R16 to remove reference to fault avoidance zone and to apply the 50m setback for buildings and structures sought by CRC. This will provide a clearer and internally consistent relationship between the Natural Hazards and Subdivision provisions.

### 7.36.3 Recommendations

418. I recommend SUB-R16 is amended as follows:

> Amend SUB-R16 as follows:
>
> Activity status: Discretionary
>
> Where:
>
> DIS-1
>
> A zone of deformation associated with fault rupture is mapped at a scale of at least 1:10,000 ~~to create a fault avoidance zone~~; and
>
> DIS-2
>
> The subdivision layout provides for future allotments, buildings and structures to be set back at least ~~20~~ 50 metres from the zone of deformation of the fault rupture on the downthrown side of the fault and 100 metres from the zone of deformation of the fault rupture on the upthrown side of the fault.

### 7.36.4 Evaluation

419. The recommended amendments to SUB-R16 improve consistency between the Subdivision and Natural Hazards provisions by using the same terminology for the mapped zone of fault deformation and aligning the rule with the 50m setback established through the recommended amendments to NH-P9. The amendments are more effective in achieving the relevant natural hazard objectives by ensuring subdivision does not enable future development inconsistent with the policy direction for fault deformation. They are also more efficient to administer by removing inconsistent terminology and setback distances that could create uncertainty for plan users and consent applicants. The amendments have limited additional costs as they principally align SUB-R16 with the corresponding Natural Hazards framework, while providing benefits through greater certainty and more consistent management of natural hazard risk. I therefore consider the amended SUB-R16 is the most appropriate way to achieve the relevant objectives of the PDP.

## 7.37 Subdivision – SUB-R17

420. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, one original submission point and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **CRC** | 271.421 |

### 7.37.1 Submissions

421. CRC [271.421] supports SUB-R17 and seeks that the rule be retained as notified.

### 7.37.2 Analysis

422. CRC [271.421] support for SUB-R17 is acknowledged.

### 7.37.3 Recommendations

423. I recommend no change to SUB-R17.

### 7.37.4 Evaluation

424. No further evaluation is necessary.

## 7.38 Subdivision – SUB-S1

425. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, 21 original submission points and two further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| T Walton | 43.2 |
| M Carena | 73.5 |
| P Plunket | 147.5 |
| Bryry Trust | 165.95 |
| KO | 168.7 |
| M Lowe 2 | 200.1 and 200.2 |
| B Burnett | 258.32 |
| CRC | 271.422 |
| PKM Farms | 287.118 |
| E Schultz | 305.154 and 305.155 |
| WPG 2 | 306.154 |
| AJ Gibson | 140.1 |
| P & S Mitchell | 302.332 |
| H Jansen | 311.7 |
| P Plunket | 147.1 |
| Terramark | 176.17 |
| Shelton Downs | 193.17 |
| FFNZ | 246.220 |
| Hollamby Family Trust | 252.64 |
| **Further Submitter Name** | **Further Submission Point Number(s)** |
| Ōtamatapaio Station | FS262 |

### 7.38.1 Submissions

426. KO [168.7], E Schultz [305.154] and WPG 2 [306.154] support the notified minimum allotment sizes in SUB-S1, KO supports the General Residential and Medium Density Residential Zone standards subject to its relief on SUB-R5. E Schultz and WPG 2 seek SUB-S1(a)-(e) to be retained as notified.

427. T Walton [43.2], P Plunket [147.5] and M Lowe 2 [200.2] seek amendments to the Rural Lifestyle Zone standards, particularly removal of the average lot size requirement.

428. M Carena [73.5] seeks more location-specific minimum allotment sizes and opposes reducing the General Rural Zone 20ha minimum lot size for rural lifestyle sections.

429. Bryry Trust [165.95] B Burnett [258.32] and PKM Farms [287.118] seek amendments to restrictive subdivision sizes. The submitters seek a more flexible approach to rural lot sizes.

430. M Lowe 2 [200.1] seeks amendment to the Medium Density Residential Zone minimum lot size from 200m$^2$ to 150m$^2$.

431. CRC [271.422] generally supports SUB-S1 but seeks amendments to the Settlement Zone and Rural Lifestyle Zone standards for consistency with the CLWRP rules for sites under 4,000m$^2$ including larger minimum lot sizes where sites are not reticulated.

432. E Schultz [305.155] and AJ Gibson [140.1] objects to the proposed increase in minimum lot size from 4ha to 20ha in the General Rural Zone. The submitter considers the change is excessive and unnecessary for North Otago and would have negative impacts on land use flexibility and rural community vitality. Considers a 10ha minimum to be a more balanced alternative, supporting primary production while avoiding the adverse effects of the proposed 20ha threshold. Reduce the General Rural Zone minimum net site area to 10ha in SUB-S1(e).

433. E Schultz [305.154] also support the minimum allotment sizes for GRZ, MRZ, SETZ, RLZ and GRUZ.

434. P & S Mitchell [302.332] supports SUB-S1.

435. H Jansen [311.7] supports in part - protection and kaitiakitanga (guardianship) of the land is at the heart of the Geopark philosophy. Support and seeks amendments for Outstanding Natural Features (or other UNESCO Geopark Sites) where there is potential to lower the minimum size to 20ha, with offsetting enhancement, and WWGT [Waitaki Whitestone Geopark Trust] written approval has been obtained.

436. P Plunket [147.1] supports the 20ha minimum lot size in the General Rural Zone but considers that a larger minimum lot size should also be applied.

437. Terramark [176.17] supports in part or are neutral in respect to SUB-S1 stating that exemptions are required in General Rural Zone for boundary adjustments / farm succession to occur.

438. Shelton Downs [193.17] considers that RSL, SNF, ONF, ONL and Shelton Downs Precinct (proposed) should have their minimum lot size reduced. Amend SUB-S1 'Minimum allotment sizes and dimensions' for RSL, SNF and the Shelton Downs Precinct as follows:

    f. Rural Scenic Landscape and Significant Natural Features - 20~~40~~ha net site area

    g. Outstanding Natural Features or Landscapes - ~~100~~20ha net site area

    Shelton Downs Precinct - 15ha net site area

438. FFNZ [246.220] The submitters support SUB-S1 in part, accepting the 20 ha minimum for the GRUZ. FFNZ oppose the larger minimum allotment sizes for the RSL and SNF (40 ha) and ONF/ONL (100 ha). Emphasising that farmers may need to create smaller, saleable lots for income or succession planning and note that subdivision itself does not affect ONF, ONL, SNF, or RSL values. Subdivision simply creates titles and does not necessarily lead to new buildings or earthworks. FFNZ also oppose the inclusion of the RSL in the plan, consistent with their broader concerns raised in submissions on the NFL chapter.

439. Hollamby Family Trust [252.64] considers that subdivision of GRUZ to 20ha is potentially worse for the community and protection of productive land. The submitter opposes restricting subdivision sizes as it will hinder efficient and effective farm operations by limiting production scale and reducing economic viability.

### 7.38.2 Analysis

440. Support of KO [168.7], E Schultz [305.154] and WPG 2 [306.154] for the notified minimum allotment sizes in SUB-S1 that remain part of the PDP is acknowledged. KO's relief relating to SUB-R5 is addressed separately above.

441. T Walton [43.2] and P Plunket [147.5] and M Lowe 2 [200.2] seek removal of the average allotment size requirement applying in the Rural Lifestyle Zone. I acknowledge that an average allotment size can constrain the range of allotment sizes achievable within an individual subdivision. However, the combination of minimum and average allotment sizes provides flexibility in the configuration of individual allotments while ensuring that the overall density and pattern of subdivision remain consistent with the anticipated character of the Rural Lifestyle Zone. Removing the average requirement would enable a subdivision to comprise predominantly allotments at or close to the minimum size, resulting in a materially greater overall density than anticipated. I therefore consider the average allotment size requirement should be retained.

442. I acknowledge M Carena's [73.5] request for greater recognition of location-specific circumstances. To the extent that the submission relates to the minimum allotment size applying to the General Rural Zone, that standard has subsequently been withdrawn and is no longer relevant to the provisions being considered through this hearing. In relation to the remaining SUB-S1 standards, I do not consider a more complex series of location-specific minimum allotment sizes is necessary or would improve the administration of SUB-S1.

443. Bryry Trust [165.95], B Burnett [258.32] and PKM Farms [287.118] seek greater flexibility in rural allotment sizes. I note that the minimum allotment size standards applying to the General Rural Zone, Rural Scenic Landscapes and Significant Natural Features, and Outstanding Natural Landscapes have subsequently been withdrawn from SUB-S1. To the extent that the relief sought relates to those standards, it is no longer relevant to the provisions being considered through this hearing.

444. In relation to M Lowe 2 [200.1], I do not consider it appropriate to reduce the Medium Density Residential Zone minimum allotment size from 200m$^2$ to 150m$^2$. The minimum allotment size assists in ensuring that newly created allotments have sufficient dimensions and area to accommodate development consistent with the anticipated built form of the zone. While smaller sites may be capable of accommodating appropriate development in some circumstances, reducing the standard across the zone would enable those allotments as the generally anticipated outcome without any site-specific assessment. I consider the notified 200m$^2$ minimum provides an appropriate baseline while more intensive subdivision can be considered through the applicable consent pathway.

445. I acknowledge CRC's [271.422] concern regarding subdivision of unreticulated sites in the Settlement and Rural Lifestyle Zones and the relationship with the CLWRP requirements for sites below 4,000m$^2$. However, the District Plan subdivision standards and the regional plan provisions perform different functions. SUB-S1 manages the anticipated size and pattern of allotments, while the regional framework manages

matters associated with wastewater disposal and effects upon land and water. The need to obtain any necessary regional approvals continues to apply irrespective of compliance with SUB-S1.

446. I therefore do not consider that the minimum allotment sizes in SUB-S1 should be increased solely to replicate the 4,000m$^2$ threshold applying under the regional planning framework. Whether an individual unreticulated allotment can be appropriately serviced is more directly addressed through the PDP servicing requirements and the applicable regional plan provisions. Retaining separate but complementary requirements avoids using minimum allotment size as a proxy for determining the suitability of on-site wastewater servicing.

447. I acknowledge P & S Mitchell's [302.332] general support for SUB-S1. I also acknowledge E Schultz [305.154] supports the minimum allotment sizes applying to the General Residential, Medium Density Residential, Settlement, Rural Lifestyle and General Rural Zones. To the extent that this support relates to the General Rural Zone, I note that the minimum allotment size applying to that zone has subsequently been withdrawn. The remaining support is consistent with my conclusions above and no further amendment is required.

448. The notified minimum allotment size applying to Outstanding Natural Features and Landscapes has subsequently been withdrawn from SUB-S1. Accordingly, the specific standard that H Jansen [311.7] seeks to amend is no longer being progressed. I also do not consider it appropriate to introduce a separate minimum allotment size or consenting pathway based on identification as a UNESCO Geopark site or the written approval of the Waitaki Whitestone Geopark Trust.

449. The relief sought by P Plunket [147.1] and Terramark [176.17] relates to a standard for the General Rural Zone that is no longer being progressed and I do not recommend an amendment in response to these submissions.

450. The notified minimum allotment sizes applying to Rural Scenic Landscapes, Significant Natural Features and Outstanding Natural Features and Landscapes have subsequently been withdrawn from SUB-S1. I therefore do not recommend amendments to those standards as sought by Shelton Downs [193.17]. The requested 15ha minimum allotment size for the proposed Shelton Downs Precinct is dependent upon the establishment of that precinct and is more appropriately determined through consideration of the submissions seeking the precinct, rather than through the general subdivision standard.

451. The notified minimum allotment sizes applying to Rural Scenic Landscapes, Significant Natural Features and Outstanding Natural Features and Landscapes have subsequently been withdrawn from SUB-S1. Accordingly, the standards supported or opposed by FFNZ [246.220] are no longer being progressed and no further amendment to SUB-S1 is required in response to this submission.

452. Hollamby Family Trust [252.64] opposes the notified 20ha minimum allotment size in the General Rural Zone, as the General Rural Zone minimum allotment size has subsequently been withdrawn from SUB-S1, the provision giving rise to the submitter's concern is no longer being progressed.

### 7.38.3 Recommendations

453. I recommend no change to SUB-S1.

### 7.38.4 Evaluation

454. No further evaluation is required.

## 7.39 Subdivision – SUB-S3

455. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, one original submission point and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **CRC** | 271.423 |

### 7.39.1 Submissions

456. CRC [271.423] generally supports SUB-S3 and seeks that the standard be retained as requested.

### 7.39.2 Analysis

457. Support from CRC [271.423] for SUB-S3 is acknowledged.

### 7.39.3 Recommendations

458. I recommend no further changes to SUB-S3.

### 7.39.4 Evaluation

459. No further evaluation is required.

## 7.40 Subdivision – SUB-S4

460. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, three original submission points and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **Hort NZ** | 166.42 |
| **DOC** | 194.75 |
| **NZ Pork** | 195.30 |

### 7.40.1 Submissions

461. Hort NZ [166.42], DOC [194.75] and NZ Pork [195.30] support SUB-S4 and seek that the standard be retained as notified.

### 7.40.2 Analysis

462. Hort NZ [166.42], DOC [194.75] and NZ Pork [195.30] support for SUB-S4 is acknowledged.

### 7.40.3 Recommendations

463. I recommend no changes to SUB-S4.

### 7.40.4 Evaluation

464. No further section 32 evaluation is required.

## 7.41 Subdivision – SUB-S5

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

| Submitter Name | Submission Point Number(s) |
|---|---|
| **NZTA** | 152.56 |
| **FENZ 2** | 163.52 |
| **KiwiRail** | 233.75 |
| **E Schultz** | 305.156 |
| **WPG 2** | 306.156 |
| **Further Submitter Name** | **Further Submission Point Number(s)** |
| **NZTA** | FS152 |

### 7.41.1 Submissions

466. FENZ 2 [163.52] and KiwiRail [233.75] support SUB-S5 and seek that the standard be retained as notified.

467. NZTA [152.56] supports SUB-S5 in part but seeks an additional requirement that any vehicle crossing a State Highway complies with the proposed State Highway vehicle crossing rule.

468. E Schultz [305.156] and WPG 2 [306.156] support the need for legal access to all allotments and seek amendments so that physical access and vehicle crossing compliance are only required where physical access is provided.

### 7.41.2 Analysis

469. Support of FENZ 2 [163.52] and KiwiRail [233.75] for SUB-S5 as notified is acknowledged.

470. NZTA [152.56] seeks an additional requirement that where access to an allotment is provided directly from a State Highway, the vehicle crossing complies with the applicable State Highway vehicle crossing rule. I acknowledge the importance of ensuring that subdivision does not create access arrangements that compromise the safe and efficient operation of the State Highway network. However, any vehicle crossing associated with subdivision will remain subject to the relevant Transport Chapter provisions, including any specific requirements applying to State Highway vehicle crossings. I do not consider it necessary to duplicate those requirements within SUB-S5.

471. I acknowledge E Schultz [305.156] and WPG 2 [306.156] support the requirement for all allotments to have legal access but seek to distinguish this from the requirement to provide physical access and a compliant vehicle crossing. I consider there is merit in recognising that legal access does not necessarily require physical vehicle access to be formed at the time of subdivision in every circumstance.

472. However, where physical vehicle access is proposed or provided as part of the subdivision, it is appropriate that it is capable of safely and practically serving the resulting allotment and complies with the applicable vehicle crossing requirements. I therefore consider that any amendment should clarify that the requirements relating to physical access and vehicle crossing compliance apply where physical access is provided, while retaining the requirement for legal access to all resulting allotments.

473. In my opinion, this distinction provides greater flexibility without compromising future access outcomes. It avoids requiring physical access to be constructed where it is unnecessary at subdivision stage, while ensuring that any physical access that is provided is appropriately designed and compliant with the relevant standards.

### 7.41.3 Recommendations

474. I recommend no changes to SUB-S5.

### 7.41.4 Evaluation

475. No further evaluation is required.

## 7.42 Subdivision – SUB-S6

476. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, three original submission points and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **FENZ 2** | 163.53 |
| **E Schultz** | 305.157 |

| Submitter Name | Submission Point Number(s) |
|---|---|
| **WPG 2** | 306.157 |

### 7.42.1 Submissions

477. FENZ 2 [163.53] supports SUB-S6 in part but seeks amendments to ensure firefighting water supply requirements are addressed at subdivision stage. FENZ 2 seeks that all allotments are provided with a reticulated water supply connection or a self-sufficient water supply that includes firefighting water supply, and compliance with SNZ PAS 45.9:2008.

478. E Schultz [305.157] and WPG 2 [306.157] oppose SUB-S6 in part and seek amendments so potable water supply requirements do not apply in the General Rural Zone where no future buildings are proposed.

### 7.42.2 Analysis

479. I agree with FENZ 2 [163.53] that subdivision is an appropriate stage to ensure that resulting allotments are capable of being adequately serviced for firefighting purposes, particularly where subsequent development will rely on the servicing arrangements established through subdivision. However, I do not consider it necessary or appropriate for SUB-S6 to prescribe compliance with SNZ PAS 4509:2008. Technical standards may be amended or replaced over the life of the PDP, and incorporating a specific technical standard into SUB-S6 would reduce flexibility as to how an adequate firefighting water supply can be achieved. I consider the standard should instead establish the outcome that an adequate firefighting water supply is available, whether through a reticulated connection or an appropriate self-sufficient supply. This would also be consistent with the direction in SUB-P3 to provide for on-site water supply and firefighting requirements where reticulated services are unavailable.

480. I acknowledge that E Schultz [305.157] and WPG 2 [306.157] seek an exemption from potable water supply requirements for subdivision in the General Rural Zone where no future buildings are proposed. However, subdivision creates separate allotments with the potential for future use and development, irrespective of whether a building is proposed as part of the subdivision application. I do not consider that the absence of an immediate building proposal is sufficient reason to defer consideration as to whether or not a resulting allotment can be appropriately serviced.

481. Further, determining servicing requirements at subdivision stage provides greater certainty that allotments are suitable for their anticipated use and avoids creating allotments that may subsequently be unable to provide an appropriate potable water supply. I therefore do not consider a general exemption for General Rural Zone allotments where no building is proposed to be appropriate.

### 7.42.3 Recommendations

482. I recommend no change to SUB-S6.

### 7.42.4 Evaluation

483. No further evaluation required.

## 7.43 Subdivision – SUB-S7

484. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, five original submission points and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **Terramark** | 176.15 |
| **FFNZ** | 246.221 |
| **CRC** | 271.424 |
| **E Schultz** | 305.158 |
| **WPG 2** | 306.158 |

### 7.43.1 Submissions

485. CRC [271.424] supports SUB-S7 and seeks that the standard be retained as notified.

486. Terramark [176.15], FFNZ [246.221], E Schultz [305.158] and WPG 2 [306.158] seek amendments to SUB-S7 so that wastewater servicing does not need to be designed or installed at the time of subdivision:

1. Where a connection to reticulated wastewater system is unavailable and wastewater is to be disposed of on-site:

a. provision shall be made for all allotments ~~shall~~ to be ~~provided with~~ serviced by a septic tank, or soakage field, or an alternative means to dispose of sewage in a sanitary manner within the net site area of the allotment;

### 7.43.2 Analysis

487. Support from CRC [271.424] for SUB-S7 is acknowledged.

488. Terramark [176.15], FFNZ [246.221], E Schultz [305.158] and WPG 2 [306.158] seek amendments to SUB-S7 so that, where reticulated wastewater servicing is unavailable, provision is made for future on-site wastewater servicing rather than requiring the servicing to be designed and installed at the time of subdivision.

489. I acknowledge that the proposed amendments would provide greater flexibility where the eventual development of an allotment is not known at subdivision stage. However, I consider the notified approach appropriately ensures that each resulting allotment has a suitable and functioning wastewater servicing solution when it is created.

490. In particular, the certification requirements associated with SUB-S7 provide assurance that the proposed on-site wastewater system has been appropriately designed for the characteristics and constraints of the allotment. Replacing the requirement to provide

the system with a more general requirement to make provision for future servicing would reduce that certainty and defer assessment of an important servicing matter until subsequent development.

491. I consider it appropriate to resolve wastewater servicing at subdivision stage, when the size and configuration of the resulting allotments are being established. This reduces the risk of creating allotments where subsequent development is constrained by the inability to provide an appropriate on-site wastewater solution and gives effect to SUB-O3, which seeks to ensure infrastructure is sufficient and is in place or installed at the time of subdivision.

### 7.43.3 Recommendations

492. I recommend no changes to SUB-S7.

### 7.43.4 Evaluation

493. No further evaluation is required.

## 7.44 Subdivision – SUB-S8

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

| Submitter Name | Submission Point Number(s) |
|---|---|
| **KiwiRail** | 233.76 |
| **FFNZ** | 246.222 |
| **CRC** | 271.425 |
| **E Schultz** | 305.159 |
| **WPG 2** | 306.159 |
| **Further Submitter Name** | **Further Submission Point Number(s)** |
| **ORC** | FS259 |

### 7.44.1 Submissions

495. KiwiRail [233.76] and CRC [271.425] support SUB-S8 and seek that the standard be retained as notified.

496. FFNZ [246.222] supports SUB-S8 in part but seeks amendments to better align with regional council requirements for stormwater disposal, including a note that stormwater discharges to land or water must also comply with Canterbury or Otago Regional Council requirement. FFNZ opposes onsite stormwater provision in the Stormwater chapter.

497. E Schultz [305.159] and WPG 2 [306.159] oppose SUB-S8 in part and seek amendments so that stormwater management and reticulated stormwater connection requirements

do not apply in the General Rural Zone, with stormwater systems instead addressed at construction stage where needed.

### 7.44.2 Analysis

498. Support from KiwiRail [233.76] and CRC [271.425] for SUB-S8 as notified is acknowledged.

499. FFNZ [246.222] seeks greater alignment between SUB-S8 and the applicable regional council requirements for stormwater discharges. I acknowledge that stormwater discharges may require separate authorisation under the relevant regional planning framework. However, those requirements apply independently of the PDP and do not need to be replicated or cross-referenced within the subdivision standard. Adding a note referring generally to Canterbury or Otago Regional Council requirements would not alter the statutory obligations applying to a subdivision and may become inaccurate as regional provisions change.

500. I also do not consider FFNZ's opposition to on-site stormwater provisions elsewhere in the PDP provides a basis for removing or weakening SUB-S8. At subdivision stage it is appropriate to establish how resulting allotments will be adequately serviced for stormwater, including where connection to a reticulated system is unavailable. This addresses the suitability and servicing of the subdivision itself, rather than duplicating the regional councils management of discharges to land or water.

501. E Schultz [305.159] and WPG 2 [306.159] seek an exemption for the General Rural Zone, with stormwater management instead addressed at construction stage where necessary. While the nature and scale of stormwater effects will differ between rural and urban subdivision, I do not consider that this justifies a general exemption. The subdivision process establishes the size, configuration, access and servicing arrangements of resulting allotments, and provides an appropriate opportunity to ensure that stormwater can be managed without creating subsequent servicing or drainage constraints.

502. Deferring stormwater management entirely until construction could result in allotments being created without adequate consideration of their ability to accommodate necessary stormwater infrastructure or disposal. I therefore consider the notified approach appropriately addresses stormwater servicing at subdivision stage and recommend that SUB-S8 be retained as notified.

### 7.44.3 Recommendations

503. I recommend no change to SUB-S8.

### 7.44.4 Evaluation

504. No further evaluation is required.

## 7.45 Subdivision – SUB-S9

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

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

| Submitter Name | Submission Point Number(s) |
|---|---|
| **G Clark** | 1.1 |
| **Terramark** | 176.16 |
| **M Lowe 2** | 200.3 |
| **Telcos** | 244.94 |
| **FFNZ** | 246.223 |
| **CRC** | 271.426 |
| **E Schultz** | 305.160 |
| **WPG 2** | 306.160 |
| **Further Submitter Name** | **Further Submission Point Number(s)** |
| **PowerNet** | FS197 |
| **Waitaki Network** | FS288 |

### 7.45.1 Submissions

506. CRC [271.426] supports SUB-S9 and seeks that the standard be retained as notified.

507. G Clark [1.1] seeks amendments to SUB-S9 to replace references to *accessway* with *access*, to clarify the intended meaning and avoid confusion with pedestrian access.

508. M Lowe 2 [200.3] opposes the specific requirement for *fibre optic cable connections* and seeks replacement of this term with the broader term *telecommunications* connections.

509. Telcos [244.94] support telecommunications connection requirements and seek fibre connections in all zones except the General Rural Zone, while allowing rural allotments to be serviced by fibre, mobile, wireless or satellite connections where confirmed by a telecommunications network operator. Telcos seek requirements for telecommunications land, easements and consultation with network operators for subdivision creating more than 15 lots.

510. Terramark [176.16], FFNZ [246.223], E Schultz [305.160] and WPG 2 [306.160] seek amendments to SUB-S9 so that the General Rural Zone is excluded from mandatory electricity and telecommunications connection requirements at subdivision stage.

### 7.45.2 Analysis

511. Support from CRC [271.426] for SUB-S9 as notified is acknowledged.

512. G Clark [1.1] seeks replacement of accessway with access. I agree that this amendment is appropriate having regard to the PDP definitions. Access is defined broadly "*as any area of land providing access between a boundary and the net area of the site or sites it serves, and expressly includes rights of way, private ways, access lots, access legs and private roads"*. In contrast, Access way has the meaning given in the Land Transport Act

1998 and Local Government Act 1974 and is specifically "*a passage way providing a public pedestrian route between roads, service lanes, reserves and other public places*". Accordingly, the notified reference to accessway does not accurately describe the range of legal and physical access arrangements that may serve an allotment. I recommend replacing accessway with access in SUB-S9 to ensure the standard applies to the intended range of subdivision access arrangements.

513. M Lowe 2 [200.3] seeks replacement of the specific requirement for fibre optic cable connections with the broader term telecommunications connections. I agree that prescribing fibre optic cable is unnecessarily specific. Telecommunications technology and servicing methods may change over the life of the PDP, and the relevant resource management outcome is that allotments are capable of being appropriately serviced for telecommunications. A technology-neutral requirement for telecommunications connections would provide greater flexibility while maintaining that outcome.

514. Telcos [244.94] similarly seek greater flexibility for telecommunications servicing in the General Rural Zone, including fibre, mobile, wireless or satellite connections where availability is confirmed by a telecommunications network operator. This is consistent with a technology-neutral approach and recognises that a physical fibre connection may not be practicable or necessary for all rural allotments. I consider the standard should enable an appropriate telecommunications connection rather than prescribe a particular technology.

515. However, I do not consider it necessary to introduce additional requirements for telecommunications land, easements and consultation with network operators for subdivisions creating more than 15 allotments. Necessary land and easement requirements will depend on the particular network solution and subdivision design, and consultation is a process rather than a subdivision outcome. Prescribing these requirements based solely on a 15-allotment threshold would add complexity without demonstrating that they are necessary in every case.

516. Terramark [176.16], FFNZ [246.223], E Schultz [305.160] and WPG 2 [306.160] seek a broader exemption from electricity and telecommunications servicing requirements in the General Rural Zone. As discussed in relation to other servicing standards, I consider it appropriate that the servicing of resulting allotments is addressed when subdivision occurs rather than deferred entirely until subsequent development. However, the withdrawal of the notified General Rural Zone provisions means that I do not consider it appropriate to introduce a new GRUZ-specific exemption through SUB-S9 in isolation, with the operative provisions continuing to apply to subdivision in that zone.

517. I therefore recommend that SUB-S9 be amended to use access rather than accessway and to adopt technology-neutral terminology for telecommunications connections. I otherwise recommend retaining the notified servicing approach.

### 7.45.3 Recommendations

518. I recommend the following changes to SUB-S9:

SUB-S9 Electricity and telecommunications

General Residential Zone

Medium Density Residential Zone

1. All allotments must have provision for:
    a. ~~fibre optic cable~~ telecommunication connections; and
    b. electricity connections.
2. where two or more allotments share an access~~way~~, the ~~fibre optic~~ telecommunication cable or electricity connection must be available from where the access~~way~~ joins the main body of each allotment.

Matters of discretion are restricted to:

1. the provision of alternative solutions.

All other zones (except General Rural Zone)

3. All allotments must have provision for:
    a. Telecommunication connections; and
    b. Electricity connections.
4. where two or more allotments share an access~~way~~, the telecommunication or electricity connection must be available from where the access~~way~~ joins the main body of each allotment.

Matters of discretion are restricted to:

1. the provision of alternative solutions.

### 7.45.4 Evaluation

519. The recommended amendments to SUB-S9 improve the effectiveness of the standard by using the defined term access, which accurately captures the range of access arrangements that may serve an allotment, and by replacing the prescriptive reference to fibre optic cable with technology-neutral telecommunications terminology. This provides clearer and more durable direction while continuing to achieve the servicing outcomes sought by SUB-O3.

520. The amendments are more efficient because they reduce uncertainty arising from the narrower defined meaning of access way and avoid unnecessarily prescribing a particular telecommunications technology. This provides greater flexibility for applicants and network operators without reducing the requirement for allotments to be appropriately serviced. I consider the amendments have minor administrative and economic benefits and no material environmental, social or cultural costs.

521. I consider the recommended amendments are a more efficient and effective means of achieving the relevant subdivision objectives and are the most appropriate provisions in terms of section 32 of the RMA

## 7.46 Subdivision – SUB-S10

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

to each point is provided in full in **Appendix 2**. Overall, four original submission points and no further submission points are addressed here.

| Submitter Name | Submission Point Number(s) |
|---|---|
| **Shelton Downs** | 193.18 |
| **CRC** | 271.427 |
| **E Schultz** | 305.161 |
| **WPG 2** | 306.161 |

### 7.46.1 Submissions

523. CRC [271.427], E Schultz [305.161] and WPG 2 [306.161] support SUB-S10 and seek that the standard be retained as notified.

524. Shelton Downs [193.18] seeks to amend SUB-S10 as follows:

Amend SUB-S10 as follows:

1. Where a subdivision of land creates an allotment (including any balance allotment) that is less than 4ha in area and which adjoins the bank(s) of a waterbody over 3m in width, that allotment must set aside an esplanade reserve or esplanade strip with a minimum width of 20 metres, unless there is existing public access.

2. where a subdivision of land creates an allotment (including any balance allotment) that is less than 4ha in area and which adjoins Mean High Water Springs, that allotment must set aside an esplanade reserve or esplanade strip with a minimum width of 20 metres.

### 7.46.2 Analysis

525. Support from CRC [271.427], E Schultz [305.161] and WPG 2 [306.161] for SUB-S10 as notified is acknowledged.

526. Shelton Downs [193.18] seeks an exemption from the requirement to provide a 20m esplanade reserve or strip alongside waterbodies over 3m in width where existing public access is available. I acknowledge that existing public access is relevant when determining the need for, or form of, an esplanade reserve or strip. However, public access is only one of the purposes served by esplanade reserves and strips.

527. In particular, the wider policy framework recognises that esplanade reserves and strips may also provide for recreational use and the protection of conservation and takata whenua values. SUB-P11 already provides a specific mechanism for considering reductions or waivers, including where safe public access and recreational use is already possible and can be maintained into the future.

528. I therefore do not consider that the existence of public access should, by itself, provide an automatic exemption from SUB-S10. Such an exemption could prevent consideration of the other values and functions that an esplanade reserve or strip may provide in a particular location. The notified approach, together with the ability to consider a

reduction or waiver under the policy framework, provides a more appropriate means of responding to site-specific circumstances.

### 7.46.3 Recommendations

529. I recommend no change to SUB-S10.

### 7.46.4 Evaluation

530. No further evaluation is required.

# 8 Conclusion

531. The SUB Chapter establishes the framework for managing the creation of new allotments and associated patterns of development across the Waitaki District. The provisions address subdivision design and servicing, integration with infrastructure and the transport network, protection of regionally significant infrastructure, natural hazards, esplanade reserves and strips, and the particular subdivision outcomes anticipated within different zones.

532. Having considered all of the submissions and further submissions addressed in this report, and the relevant statutory and higher-order planning documents, I recommend that the SUB Chapter be amended as set out in **Appendix 1** of this report. The recommended amendments are generally targeted and seek to improve the clarity, effectiveness and internal consistency of the notified provisions, including in relation to overlay provisions, esplanade outcomes, infrastructure servicing, the National Grid and electricity distribution network, hydroelectricity inundation hazards, and telecommunications servicing.

533. A number of submissions seek more substantial changes to subdivision requirements, including greater flexibility in relation to allotment size, servicing and infrastructure requirements, and the timing at which these matters are addressed. For the reasons set out in this report, I generally consider it appropriate that the subdivision framework provides sufficient certainty at the time allotments are created that they can be appropriately accessed, serviced and developed, while avoiding unnecessary duplication with other PDP provisions or requirements administered under other statutory frameworks.

534. I have also had regard to the withdrawal of the notified General Rural Zone provisions. Where submissions seek changes specifically relating to subdivision within the General Rural Zone, I have sought to avoid introducing amendments in isolation that would result in an incoherent relationship between the remaining PDP subdivision provisions and the ODP provisions that continue to apply.

535. Overall, and subject to the amendments recommended in this report, I consider the Subdivision provisions to be the most appropriate means to:

- achieve the purpose of the RMA;

- give effect to the relevant national policy statements and the relevant provisions of the regional policy statements; and
- achieve the relevant objectives of the PDP relating to subdivision, land development, infrastructure, natural hazards and the sustainable management of the Waitaki District's resources.

# Appendix 1
# Recommended Changes to Provisions

**Key:**

- Withdrawn as tracked as: ~~deleted~~ or inserted
- Section 42A recommendations are tracked as: ~~deleted text~~ and inserted text

# Subdivision

## Introduction

Subdivision is the process of dividing a site or building into one or more additional sites or units, or changing an existing boundary location. The way a site is subdivided, including its size and shape, is important, as it can influence the future use and development of the land, its character and quality and any impacts on adjoining sites. Subdivision can also affect the natural and physical environment and introduce long-term development patterns that cannot be easily changed.

The Plan's intent is that any brownfield subdivision and greenfield subdivisions are designed in an integrated way that contribute to a sense of place, are connected to existing communities and are well-designed, accessible, sunny and safe. The Plan also controls infill subdivision, to ensure that opportunities are realised for intensification within appropriate urban locations, in a manner that is consistent with the area's anticipated character and amenity values.

This chapter contains rules and standards relating to subdivision of land within overlays. The objectives and policies relating to subdivision in natural hazard~~, historical, cultural, ecological, natural or landscape~~ overlays are found in those various District-wide chapters.

***User Notes:***
*For some activities, a resource consent may be required by rules in more than one chapter in the District Plan. Plan users are encouraged to check all District-Wide Matters chapters, as well as the relevant zone chapter.*
*SUB-R1 to SUB-R5 are the general rules that apply to subdivisions. SUB-R6 to SUB-R18 set out specific rules relating to subdivisions in overlays ~~and the Coastal Environment~~. SUB-R6 to SUB-R18 apply in addition to SUB-R1 to SUB-R5~~. For instance, a subdivision to create a vacant allotment in an Outstanding Natural Feature and Landscape will require consent under SUB-R4 and SUB-R10~~.*
*Please refer to the General Approach chapter for more information on the steps plan users should take to determine what rules apply to an activity and to determine the consent status of an activity.*
*Note: Except for the following, the objectives, policies and rules in this chapter do not apply to infrastructure activities by network utility operators:*
*Subdivision Chapter: SUB-O2, SUB-O3, SUB-O4, SUB-P1, SUB-P2, SUB-P3, SUB-P5, SUB-P6, SUB-P7, SUB-P9, SUB-P12, SUB-P13, SUB-P14, SUB-P15, SUB-P16, SUB-P17 and SUB-R3.*
*Other requirements outside of the District Plan:*
*Wastewater:*
*Any on-site wastewater system must also meet the requirements outlined in either the Regional Plan: Water for Otago, or the Canterbury Land and Water Regional Plan, depending on which region a site is located in. Both of these regional plans contain rules and standards around discharges to land, including the design of systems and setbacks from boundaries and waterways.*

## Objectives

| SUB-O1 | Subdivision |
|---|---|
| Subdivision creates allotments and patterns of land development that are compatible with the purpose, character and qualities of each zone ~~and achieve the objectives of overlays.~~ | |

| SUB-O2 | Subdivision design |
|---|---|

Subdivision occurs in a sequenced and coherent manner and is designed so that it:

1. reflects and responds to:
    a. the physical characteristics and constraints of the site; and
    b. considerations for passive solar gain for dwellings in the subdivision; and
    c. the character and amenity values of the surrounding area; and
2. is accessible and is connected to and integrated with existing communities and the transport network; and
3. consolidates urban development; and
4. promotes good quality urban design; and
5. maintains rural character in rural areas; and
6. avoids the sprawl of existing settlements or creation of new settlements; and
7. has an efficient, safe and accessible layout; and
8. provides for the health and well-being of communities; and
9. provides accessible, usable and well-designed open space areas; and
10. maintains or enhances the productive capacity of highly productive land and
11. maintains or where appropriate protects the values of relevant overlays.

| SUB-O3 | Infrastructure |
|---|---|

Subdivision is serviced by infrastructure that has sufficient capacity for the development of the land and has been planned or provided for in an integrated manner to be in place or installed at the time of the proposed subdivision.

| SUB-O4 | Subdivision and Regionally Significant Infrastructure |
|---|---|

Subdivision does not compromise the operation or safety of Regionally Significant Infrastructure.

| SUB-O5 | Esplanade reserves and esplanade strips |
|---|---|

Esplanade reserves and esplanade strips contribute to the maintenance, enhancement and protection of ecological, recreational and amenity values, public access and hazard management.

## Policies

| SUB-P1 | Creation of allotments |
|---|---|

Enable subdivision that creates allotments which:

1. reflect the intended pattern of development and are consistent with the anticipated role, character and amenity values of the zone; and
2. are of a size and dimensions that are sufficient to accommodate the intended or anticipated use and development form for the applicable zone.

| SUB-P2 | Boundary adjustments and updates to existing cross-leases |
|---|---|

Enable boundary adjustments and updates to existing cross-lease titles which achieve a more efficient and effective use of land.

| SUB-P3 | Provision of infrastructure |
|---|---|

Require infrastructure to be provided in an integrated and comprehensive manner by:

1. ensuring that the subdivision will be appropriately serviced and integrated with existing and planned infrastructure; and
2. ensuring that infrastructure meets WDC standards and has sufficient capacity to accommodate the development or anticipated future development; and
3. requiring infrastructure to be installed at the time of subdivision; and
4. requiring connections to reticulated systems, where reticulation services are available for the allotment, or are within close proximity to the site; and
5. ensuring that appropriate on-site wastewater, stormwater and water supply infrastructure, which avoids or mitigates adverse effects on the environment and human health and with sufficient capacity for firefighting purposes, is provided on-site where reticulated services are not available for the site; and
6. ensuring telecommunications and power supply is provided to all allotments.

| SUB-P4 | Transport network |
|---|---|

Ensure that subdivision does not compromise the safe and efficient functioning of the transport network by:

1. requiring roads, access lots and rights of way to meet minimum design standards to allow for safe and efficient traffic movements; and
2. including transport network connections within and between communities where opportunities exist; and
3. avoiding subdivision design and layout that would constrain the ability to connect to future developments on adjoining sites; and
4. providing for a variety of travel modes that reflect the role, function and character of the zone, including walking, cycling and access to public transport; and
5. achieving safe and efficient access onto and from State Highways, where applicable.

| SUB-P5 | Subdivision for network utilities |
|---|---|

Control the creation of allotments for the purposes of a network utility to ensure that the lot is a sufficient size to accommodate its required use.

| SUB-P6 | Effects of subdivision on infrastructure |
|---|---|

Require subdivisions to be designed to minimise any adverse effects, including reverse sensitivity effects on the safe and efficient operation, maintenance of, and access to Regionally Significant Infrastructure.

| SUB-P7 | Subdivision and the National Grid |
|---|---|

Avoid locating building platforms within the National Grid Yard and only allow for subdivision within the National Grid Subdivision Corridor where it can be demonstrated that any adverse effects on the National Grid will be avoided, remedied, or mitigated, taking into account:

1. the impact of subdivision layout and design on the operation, maintenance, upgrade and development of the National Grid;
2. the ability of future development to comply with the New Zealand Code of Practice for Electrical Safe Distances 2001 (NZECP 34:2001);
3. the extent to which the design, construction and layout of the subdivision (including landscaping) demonstrates that a suitable building platform(s) for a dwelling can be provided outside of the National Grid Yard for each new lot to ensure adverse effects on and from the National Grid and on public health and safety are appropriately avoided, remedied, or mitigated;
4. the risk to the structural integrity of the National Grid;
5. the extent to which the subdivision design and consequential development will minimise the risk of injury and/or property damage from such lines;
6. the extent to which the subdivision design and consequential development will minimise the potential reverse sensitivity on, and amenity and nuisance effects of, the transmission asset.

| SUB-P8 | Subdivision in Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas |
|---|---|

Only allow subdivision in Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas, where it can be demonstrated that:

1. any building platforms will be located outside of any identified Waitaki Power Scheme Hydroelectricity High Hazard Area; and
2. the subdivision will not compromise the ongoing operation of the Waitaki Power Scheme; and
3. any risk to lives and well-being from an uncontrolled release of water from the Waitaki Power Scheme is acceptable.

| SUB-P9 | Esplanade reserves and esplanade strips |
|---|---|

Require the creation of esplanade reserves or esplanade strips when subdividing land adjoining the coast and other qualifying waterbodies over 3m in width for public access and esplanade strips, except where the subdivision is for a boundary adjustment or is for a network utility.

| SUB-P10 | Esplanade reserves and esplanade strips — other waterbodies |
|---|---|

Consider the following matters when determining whether to require the creation of an esplanade reserve or esplanade strip for subdivision of land adjoining any other waterbody over 3m in width:

1. the level of contribution to enable public access, recreational use or the protection of conservation or takata whenua values; and
2. the appropriate mechanism to achieve 1.

| SUB-P11 | Reductions or waivers of esplanade reserves and esplanade strips |
|---|---|

Only allow for exemption from the provision of an esplanade strip, a reduction or waiver in the width, or provision of any required esplanade reserve or esplanade strip, where it can be demonstrated, if relevant, that:

1. safe public access and recreational use is already possible and can be maintained for the future; and
2. an esplanade strip would better provide for public and customary access, recreation, hazard management, stormwater management and ecological values; and
3. the ecological values and landscape features of the land adjoining the coast or other waterbody will not be adversely affected; and
4. any scheduled Historic Heritage Items in SCHED2 — Historic Heritage Items~~, or scheduled wāhi tūpuna in SCHED5 — Sites and Areas of Significance to Māori~~ will not be adversely affected; and
5. the reduced width of the esplanade reserve or esplanade strip is sufficient to manage the risk of adverse effects resulting from natural hazards, taking into account the likely long-term effects of climate change; and
6. a full width esplanade reserve or esplanade strip is not required to maintain the natural character and amenity values of the ~~Coastal Environment~~coastal environment; and
7. a reduced width in certain locations is offset by an increase in width in other locations or areas which would result in a positive public benefit, in terms of public and customary access, recreation, hazard management, stormwater management and ecological values.

| SUB-P12 | Subdivision Design |
|---|---|

Ensure that subdivision is designed and located to:

1. maximise accessibility and connectivity with the surrounding community through walkways, cycleways and an interconnected transport network; and
2. reflect and respond to physical site characteristics, constraints and opportunities; and
3. minimise earthworks and land disturbance by designing building platforms that integrate into the natural landform; and
4. achieve hydraulic neutrality in urban zones; and
5. align streets and design open spaces to focus on significant views or landmarks; and
6. create allotment sizes and shapes that support a range of housing types and sizes and appropriate business activities; and
7. ~~when within any scheduled wāhi tūpuna in SCHED5 — Sites and Areas of Significance to Māori for any greenfield subdivision, incorporate mātauraka Māori principles and provide opportunities to maintain or strengthen the relationship of takata whenua with their ancestral lands, water, sites, wāhi tapu, wāhi tūpuna and other taoka, where these have been identified through engagement with takata whenua and the subdivision has the potential to compromise takata whenua values and interests; and~~
8. minimise future conflicts with roading and infrastructure, including as a result of the planting of new vegetation; and
9. maximise sunlight access, outlook and amenity, including opportunities for future buildings to maximise solar gain, reduce energy and water consumption, and use renewable energy; and
10. provide public open spaces that are within walkable distance (400-800m) from residential allotments; and
11. provide sufficient separation from zone boundaries and transport networks to minimise the potential for any reverse sensitivity effects and/or conflict with existing and permitted activities on adjoining sites.
12. be consistent with any relevant design guidelines which promote good planning, building design and urban design that give effect to the New Zealand Urban Design Protocol (2005); and
13. incorporate principles of Crime Prevention Through Environmental Design to achieve safe environments.

| SUB-P13 | Subdivision in the Residential Zones |
|---|---|

Provide for subdivision in Residential Zones, including infill subdivision, where the design, size and shape of allotments:

1. is consistent with and complement the anticipated residential density and form of development for the relevant zone;
2. support a range of housing types and sizes and offer different housing choices;
3. allow sufficient sunlight to living and outdoor spaces and enable on-site amenity values and privacy; and
4. maximise opportunities for buildings to face the road or overlook public space; and
5. is consistent with any relevant design guidelines, including the Medium Density Residential Design Guidelines.

| SUB-P14 | Subdivision in the Commercial Zones |
|---|---|

Provide for subdivision in Commercial Zones where the design, size and shape of allotments:

1. is consistent with and complement the anticipated scale, type and form of use and development for the relevant zone;
2. incorporate setbacks at Residential and Open Space Zone interfaces, to provide sufficient space for planting or landscaping;
3. minimise a proliferation of vehicle crossings that may restrict pedestrian movements;
4. maximises opportunities for retail activity to occur at ground floor level; and
5. is consistent with the Ōamaru Town Centre Design Guidelines.

| SUB-P15 | Subdivision in the Industrial Zones |
|---|---|
| Provide for subdivision in Industrial Zones where the design, size and shape of allotments:<br>1. is consistent with and complement the anticipated scale, type and form of use and development for the relevant zone; and<br>2. incorporate setbacks at Residential and Open Space Zone interfaces, to provide sufficient space for planting or landscaping. | |

| SUB-P15 | Subdivision in the Rural ~~Zones~~ Lifestyle Zone |
|---|---|
| Provide for subdivision in the Rural ~~Zones~~Lifestyle Zone where the design, size and shape of allotments:<br>1. is consistent with and complement the role, function and anticipated scale, type and form of use and development for the relevant zone;<br>2. maintain prominent ridgelines, natural features and landforms, and areas of indigenous vegetation;<br>3. avoids buildings and access points being located in prominent locations, as viewed from public places;<br>4. incorporates physical site characteristics, constraints and opportunities into the design;<br>5. minimise earthworks and land disturbance by locating and designing building platforms to integrate into the natural landform;<br>6. maintain rural character and amenity; and<br>7. incorporates sufficient separation from zone boundaries and transport networks minimise the potential for any reverse sensitivity effects and/or conflict with existing and permitted activities on adjoining sites;<br>8. ~~protects the productivity of the land for primary production activities in the General Rural Zone by limiting fragmentation of land through avoiding new sites being created that are less than 20 hectares unless:~~<br>• ~~associated with a utility and any balance lot associated with the development of a utility; or~~<br>• ~~the subdivision occurs on a Māori Reserve~~ | |

| SUB-P17 | Subdivision in the Settlement Zones |
|---|---|
| Provide for subdivision in the Settlement Zone where the design, size and shape of allotments:<br>1. is consistent with and complement the role, function and anticipated scale, type and form of use and development for the relevant zone; and<br>2. is consistent with any relevant design guidelines. | |

## Rules

**CONTROLLED ACTIVITIES**

| SUB-R1 | Boundary adjustment | |
|---|---|---|
| **All zones <u>(except General Rural Zone)</u>** | **Activity status: Controlled**<br>**Where**:<br>CON-1<br>The boundary adjustment does not alter:<br>1. the permitted activity status of any existing permitted activities occurring on the allotments; and/or<br>2. the degree of any non-compliance with any lawfully established existing activity on the allotments; **and**<br>CON-2<br>The boundary adjustment will not result in a reduction in size of the new allotments below the minimum lot size for the relevant zone as required under SUB-S1 Minimum allotment sizes and dimensions; **and**<br>CON-3<br>All of the following standards are complied with where relevant:<br>1. SUB-S1 Minimum allotment sizes and dimensions<br>2. SUB-S5 Access<br>3. SUB-S6 Water supply<br>4. SUB-S7 Wastewater disposal<br>5. SUB-S8 Stormwater management<br>6. SUB-S9 Electricity and telecommunications<br>7. SUB-S10 Esplanade reserves and esplanade strips<br>*Note: This rule applies in addition to any other Subdivision Rule.*<br>**Matters of control are restricted to:**<br>1. the size, design and layout of allotments; and the provision and design of legal and physical access to and from the allotments, including roads and pedestrian and cycle ways; and<br>3. any consent notices relating to the site; and<br>4. any easements relating to the site; and<br>5. the location of any building platform; and<br>6. the provision of infrastructure and services for drinking water and firefighting supply, wastewater and stormwater, telecommunications and energy and any protections through legal mechanisms; and<br>7. natural hazard and geotechnical constraints. | **Activity status when compliance is not achieved: Restricted Discretionary**<br>**Where:**<br>RDIS-1<br>Compliance is not achieved with CON-1, CON-2 and/or CON-3<br>**Matters of discretion are restricted to:**<br>1. the matters of discretion listed in any of the standards SUB-S1, SUB-S5, SUB-S6, SUB-S7, SUB-S8, SUB-S9 and/or SUB-S10 that are not complied with; and<br>2. the size, design and layout of allotments; and<br>3. the provision and design of legal and physical access to and from the allotments, including roads and pedestrian and cycle ways; and<br>4. any consent notices relating to the site; and<br>5. any easements relating to the site; and<br>6. the location of any building platform; and<br>7. the provision of infrastructure and services for drinking water and firefighting supply, wastewater and stormwater, telecommunications and energy and any protections through legal mechanisms; and<br>8. natural hazard and geotechnical constraints. |

| SUB-R2 | Updating of a cross-lease title | |
|---|---|---|
| **All zones (except General Rural Zone)** | **Activity status: Controlled**<br>**Where:**<br>CON-1<br>The subdivision is around existing lawfully established buildings; **and**<br>CON-2<br>Either:<br>1. compliance is achieved with the standards that apply to the zone; or<br>2. the update does not increase any existing or previously approved non-compliance with the standards that apply to the zone.<br>*Note: This rule applies in addition to any other Subdivision Rule.*<br>**Matters of control are restricted to:**<br>1. the design and layout of the covenant areas to ensure they have the ability to accommodate the existing or intended use; and<br>2. the allocation of covenant areas to leased areas to ensure access to the buildings and the parking standards are met. | **Activity status when compliance is not achieved: Restricted Discretionary**<br>**Where:**<br>RDIS-1<br>Compliance is not achieved with CON-1 and/or CON-2<br>**Matters of discretion are restricted to:**<br>1. the matters of discretion of any infringed standard; and<br>2. the design and layout of the covenant areas to ensure they have the ability to accommodate the existing or intended use; and<br>3. the allocation of covenant areas to leased areas to ensure access to the dwellings and the parking standards are met. |

| SUB-R3 | Subdivision of land solely to create an allotment for the purpose of public works, infrastructure, reserves or access | |
|---|---|---|
| **All zones (except General Rural Zone)** | **Activity status: Controlled**<br>**Where:**<br>CON-1<br>1. the creation of any allotment does not limit or interfere with any existing allotment's physical and/or legal access to a road; and<br>2. the balance allotment does not result in any non-compliances with standards relating to the zone the allotment is located in.<br>*Note: This rule applies in addition to any other Subdivision Rule.*<br>**Matters of control are restricted to:**<br>1. the size, design and layout of lots for the purpose of public works, infrastructure, reserves or access; and<br>2. legal and physical access to and from the allotment; and<br>3. the provision of infrastructure and its protection through legal mechanisms. | **Activity status when compliance is not achieved: Restricted Discretionary**<br>**Where:**<br>RDIS-1<br>Compliance is not achieved with CON-1<br>**Matters of discretion are restricted to:**<br>1. the size, design and layout of lots for the purpose of public works, infrastructure, reserves or access; and<br>2. legal and physical access to and from the allotment; and<br>3. the provision of infrastructure and its protection through legal mechanisms. |

| SUB-R4 | Subdivision that creates any vacant allotment(s) | |
|---|---|---|
| **All zones, except the General Rural Zone, Open Space Zone, and Sport and Recreation Zone** | **Activity status: Controlled**<br><br>**Where:**<br>CON-1<br>All of the following standards are complied with where relevant:<br>1. SUB-S1 Minimum allotment sizes and dimensions;<br>2. SUB-S2 Subdivision in the Otago Flood Assessment overlay and Waitaki River Floodplain Assessment Overlay;<br>3. SUB-S3 Subdivision in the Canterbury Flood Assessment Overlay;<br>4. SUB S4 Building platform;<br>5. SUB-S5 Access;<br>6. SUB-S6 Water supply;<br>7. SUB-S7 Wastewater disposal;<br>8. SUB-S8 Stormwater management;<br>9. SUB-S9 Electricity and telecommunications;<br>10. SUB-S10 Esplanade reserves and esplanade strips<br><br>*Note: This rule applies in addition to any other applicable Subdivision Rules.*<br><br>**Matters of control are restricted to:**<br>1. the design and layout of allotments; and<br>2. the provision and design of legal and physical access to and from the allotments, including roads and pedestrian and cycle ways; and<br>3. consent notices; and<br>4. easements; and<br>5. the location of the building platform; and<br>6. the bulk, location and colour of future buildings and structures; and<br>7. the provision of infrastructure and services for drinking water and firefighting supply, wastewater and stormwater, telecommunications and energy and its protection through legal mechanisms; and<br>8. the provision of esplanade reserves or esplanade strips; and<br>9. natural hazard and geotechnical constraints. | **Activity status when compliance is not achieved: Restricted Discretionary**<br><br>**Where:**<br>RDIS-1<br>Compliance is not achieved with CON-1(2)<br><br>**Matters of discretion are restricted to:**<br>1. the matters of discretion listed in SUB-S2.<br><br>**Where:**<br>RDIS-2<br>Compliance is not achieved with CON-1(3) and the new allotment(s) are located within the Canterbury Flood Assessment Overlay, but are not located in a High Hazard Area, as determined in a flood assessment certificate prepared in accordance with NH-S1.<br><br>**Matters of discretion are restricted to:**<br>1. the matters of discretion listed in SUB-S3.<br><br>**Activity status when compliance is not achieved: Discretionary**<br><br>**Where:**<br>DIS-1<br>Compliance is not achieved with CON-1(1) and CON-1(4)-(10)<br><br>**Activity status when compliance is not achieved: Non-Complying**<br><br>**Where:**<br>NC-1<br>Compliance is not achieved with RDIS-2 |
| **General Rural Zone (as withdrawn)** | **Activity status: Controlled**<br>~~The allotments~~<br>**Where:**<br>CON-1<br><br>All of the following standards are ~~not classified as highly productive land~~ complied with where relevant:<br>1.<br>2. SUB-S2 Subdivision in the Otago Flood Assessment Overlay and Waitaki River Floodplain Assessment Overlay;<br>3. SUB-S3 Subdivision in the Canterbury Flood Assessment Overlay;<br>4.<br>5.<br>6.<br>7.<br>8.<br>9. | **Activity status when compliance is not achieved: Restricted Discretionary**<br>**Where:**<br>RDIS-1<br>Compliance is not achieved with CON-1(2)<br><br>**Matters of discretion are restricted to:**<br>1. the matters of discretion listed in SUB-S2.<br><br>**Where:**<br>RDIS-2<br>Compliance is not achieved with CON-1(3) and the new allotment(s) are located within the Canterbury Flood Assessment Overlay, but are not located in a High Hazard Area, as determined in a flood assessment prepared in accordance with NH-S1.<br><br>**Matters of discretion are restricted to:**<br>1. the matters of discretion listed in SUB-S3. |

| | | |
|---|---|---|
| | CON-2<br>Note: This rule applies in addition to any other applicable Subdivision Rules.<br>**Matters of control are restricted to:**<br>1. the design and layout of allotments; and<br>2. the provision and design of legal and physical access to and from the allotments, including roads and pedestrian and cycle ways; and<br>3. consent notices; and<br>4. easements; and<br>5. the location of the building platform; and<br>6. the bulk, location and colour of future buildings and structures; and<br>7. the provision of infrastructure and services for drinking water and firefighting supply, wastewater and stormwater, telecommunications and energy and its protection through legal mechanisms; and<br>8. the provision of esplanade reserves or esplanade strips and the relevant objectives and policies in the Public Access chapter; and<br>9. natural hazard and geotechnical constraints. | **Activity status when compliance is not achieved: Discretionary**<br>**Where:**<br>DIS-1<br>Compliance is not achieved with CON-1(4) (9)<br>**Activity status when compliance is not achieved: Non-Complying**<br>**Where:**<br>NC-1<br>Compliance is not achieved with CON-1(1)<br>**Where:**<br>NC-2<br>Compliance is not achieved with CON-2<br>**Where:**<br>NC-3<br>Compliance is not achieved with RDIS-2 |
| **Open Space Zone**<br><br>**Sport and Recreation Zone** | **Activity status: Discretionary**<br><br>*Note: This rule applies in addition to any other Subdivision Rule.* | **Activity status when compliance is not achieved: Not Applicable** |
| *Note: Section 88 Information Requirements for Applications:*<br>*Pursuant to section 88 of the RMA, any application for activities made under this provision must provide, in addition to the standard information requirements, a flood assessment, prepared by a suitably qualified and experienced professional.* | | |

| SUB-R5 | Subdivision of land around existing lawfully established buildings or buildings approved as part of a resource consent application where no vacant allotments are created | |
|---|---|---|
| **All zones, except the General Rural Zone** | **Activity status: Controlled**<br>**Where:**<br>CON-1<br>All of the following standards are complied with where relevant:<br>1. SUB-S1 Minimum allotment sizes and dimensions;<br>2. SUB-S5 Access;<br>3. SUB-S6 Water supply;<br>4. SUB-S7 Wastewater disposal;<br>5. SUB-S8 Stormwater management;<br>6. SUB-S9 Electricity and telecommunications; SUB-S10 Esplanade reserves and esplanade strips; **and**<br><br>*Note: This rule applies in addition to any other applicable Subdivision Rules.*<br>**Matters of control are restricted to:**<br>1. the size, design and layout of allotments; and<br>2. the provision and design of legal and physical access to and from the allotments, including roads and pedestrian and cycle ways; and<br>3. consent notices; and<br>4. easements; and<br>5. the location of the building platform; and<br>6. bulk, location and colour of future buildings and structures; and<br>7. the provision of infrastructure and services for drinking water and firefighting supply, wastewater and stormwater, telecommunications and energy and any protections through legal mechanisms; and<br>8. the provision of esplanade reserves or esplanade strips ~~and the relevant objective and policies in the Public Access Chapter~~; and<br>9. natural hazard and geotechnical constraints. | **Activity status when compliance is not achieved: Discretionary**<br>**Where:**<br>DIS-1<br>Compliance is not achieved with CON-1 |

| | | |
|---|---|---|
| **General Rural Zone** | **Activity status: Controlled**<br>**Where:**<br>CON-1<br>All of the following standards are complied with where relevant:<br>1. SUB-S1 Minimum allotment sizes and dimensions;<br>2. SUB-S5 Access;<br>3. SUB-S6 Water supply;<br>4. SUB-S7 Wastewater disposal;<br>5. SUB-S8 Stormwater management;<br>6. SUB-S9 Electricity and telecommunications;<br>7. SUB-S10 Esplanade reserves and esplanade strips; **and**<br>CON-2<br>The allotments are not classified as highly productive land.<br>*Note: This rule applies in addition to any other applicable Subdivision Rules.*<br>**Matters of control are restricted to:**<br>1. the size, design and layout of allotments; and<br>2. the provision and design of legal and physical access to and from the allotments, including roads and pedestrian and cycle ways; and<br>3. consent notices; and<br>4. easements; and<br>5. the location of the building platform; and<br>6. bulk, location and colour of future buildings and structures;<br>7. the provision of infrastructure and services for drinking water and firefighting supply, wastewater and stormwater, telecommunications and energy and any protections through legal mechanisms; and<br>8. the provision of esplanade reserves or esplanade strips and the relevant objectives and policies in the Public Access chapter; and<br>9. natural hazard and geotechnical constraints. | **Activity status when compliance is not achieved: Discretionary**<br>**Where:**<br>DIS-1<br>Compliance is not achieved with CON-1(2)-(7)<br>**Activity status when compliance is not achieved: Non-Complying**<br>**Where:**<br>NC-1<br>Compliance is not achieved with CON-1(1)<br>**Where:**<br>NC-2<br>Compliance is not achieved with CON-2 |

| SUB-R6 | Subdivision in the Liquefaction Assessment Overlay | |
|---|---|---|
| **All zones (including the withdrawn General Rural Zone)** | **Activity status: Controlled**<br>*Note: This rule applies in addition to any other applicable Subdivision Rules.*<br>**Matters of control are restricted to:**<br>1. site specific geotechnical conditions and recommendations from a suitably qualified geotechnical engineer; and<br>2. location, size and design of the subdivision, roads, access, services; and<br>3. any recommendations and solutions for foundations for future buildings from a suitably qualified geotechnical engineer; and<br>4. remediation and ground treatment.<br>*Note: Section 88 Information Requirements for Applications:*<br>*Pursuant to s88 of the RMA, any application for activities made under these provisions must provide, in addition to the standard information requirements, a geotechnical report that demonstrates the appropriateness of the site for the proposed development.* | **Activity status when compliance is not achieved: Not Applicable** |

| SUB-R7 | Subdivision creating a lot in the National Grid Substation Buffer | |
|---|---|---|
| **All zones (including the withdrawn General Rural Zone)** | **Activity status: Controlled**<br>**Where:**<br>CON-1<br>All allotment(s), except allotments for access or a public work, must demonstrate that they can accommodate a building footprint for any building, any dwelling and/or any sensitive activity outside of the National Grid Substation Buffer and with any necessary setbacks.<br>*Note: This rule applies in addition to any other Subdivision Rule.*<br>**Matters of control are restricted to:**<br>1. the extent to which the proposed development design and layout creates any non-compliance with the applicable standards and/or enables appropriate separation distances between sensitive activities and the substation; and<br>2. the risk of electrical hazards affecting public or individual safety, and the risk of property damage; and<br>3. measures proposed to avoid potential adverse effects, including reverse sensitivity effects, on the operation, maintenance, upgrading and development of the substation; and<br>4. technical advice from an electrical engineer specialising in electricity transmission; and<br>5. the outcome of any consultation with Transpower; and<br>6. whether the building, structure or sensitive activity could be located further from the substation. | **Activity status when compliance is not achieved: Non-Complying**<br>**Where:**<br>NC-1<br>Compliance is not achieved with CON-1 |
| ***Notification:***<br>*An application under this rule, whether controlled or non-complying, is precluded from being publicly notified in accordance with section 95A of the RMA.*<br><br>*Notice of any application for resource consent under this rule must be served on Transpower New Zealand Limited in accordance with Clause 10(2) of the Resource Management (Forms, Fees, and Procedure) Regulations 2003.* | | |

**RESTRICTED DISCRETIONARY ACTIVITIES**

| SUB-R8 | Subdivision creating an allotment within an Electricity Distribution Corridor | |
|---|---|---|
| **All zones (including the withdrawn General Rural Zone)** | **Activity status: Restricted Discretionary**<br>**Where:**<br>RDIS-1<br>Any identified building platform is located outside the Electricity Distribution Yard but within the Electricity Distribution Corridor.<br>*Note: This rule applies in addition to any other applicable Subdivision Rules.*<br>**Matters of discretion are restricted to:**<br>1. the matters in INF-P5. | **Activity status when compliance is not achieved: Non-Complying**<br>**Where:**<br>NC-1<br>Compliance is not achieved with RDIS-1 |
| ***Notification:***<br>*An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.*<br><br>*Notice of any application for resource consent under this rule must be served on Network Waitaki Limited in accordance with Clause 10(2) of the Resource Management (Forms, Fees, and Procedure) Regulations 2003.* | | |

| SUB-R9 | Subdivision creating an allotment in the National Grid Subdivision Corridor | |
|---|---|---|
| **All zones (including the withdrawn General Rural Zone)** | **Activity status: Restricted Discretionary**<br>**Where:**<br>RDIS-1<br>All resulting allotments, except allotments for access or a public work, demonstrate that they can accommodate a building footprint for the principal building and any dwelling or sensitive activity outside of the National Grid Yard.<br>*Note: This rule applies in addition to any other Subdivision Rule.*<br>**Matters of discretion are restricted to:**<br>1. the extent to which the subdivision allows for earthworks, buildings and structures to comply with the safe distance requirements of the New Zealand Code of Practice for Electrical Safe Distances 2001 (NZECP 34:2001); and<br>2. the provision for the on-going efficient operation, maintenance, development and upgrade of the National Grid, including the ability for continued reasonable access to existing transmission lines and support structures for maintenance, inspections and upgrading; and<br>3. the extent to which potential adverse effects (including visual and reverse sensitivity effects) are mitigated through the location of building platforms; and<br>4. the extent to which the design and construction of the subdivision allows for activities to be setback from the National Grid to ensure adverse effects on, and from, the National Grid, and on public safety and property, are appropriately avoided, remedied, or mitigated, for example, through the location of roads and reserves under the transmission lines; and<br>5. the nature and location of any proposed vegetation to be planted in the vicinity of the National Grid; and<br>6. the outcome of any consultation with, and | **Activity status when compliance is not achieved: Non-Complying**<br>**Where:**<br>NC-1<br>Compliance is not achieved with RDIS-1 |

| | | |
|---|---|---|
| | technical advice from, Transpower; and<br>7. the extent to which the subdivision plan clearly identifies the National Grid and proposed building platforms. | |

***Notification:***
*An application under this rule, whether restricted discretionary or non-complying, is precluded from being publicly notified in accordance with section 95A of the RMA.*

*Notice of any application for resource consent under this rule must be served on Transpower New Zealand Limited in accordance with Clause 10(2) of the Resource Management (Forms, Fees, and Procedure) Regulations 2003.*

**DISCRETIONARY ACTIVITIES**

| ~~SUB-R10~~ | ~~Subdivision of a site located fully or partially within an Outstanding Natural Feature or Landscape Overlay~~ | |
|---|---|---|
| ~~All zones~~ | ~~Activity status: Discretionary~~<br>~~*Note: This rule applies in addition to any other applicable Subdivision Rules.*~~ | ~~Activity status when compliance is not achieved: Not Applicable~~ |

| ~~SUB-R11~~ | ~~Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or Areas of Significance to Māori overlay, or a Notable Tree~~ | |
|---|---|---|
| ~~All zones~~ | ~~Activity status: Discretionary~~<br>~~*Note: This rule applies in addition to any other applicable Subdivision Rules.*~~ | ~~Activity status when compliance is not achieved: Not Applicable~~ |

| **SUB-R12** | **Subdivision in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas** | |
|---|---|---|
| **All zones (including the withdrawn General Rural Zone)** | **Activity status: Discretionary**<br>*Note: This rule applies in addition to any other applicable Subdivision Rules.* | **Activity status when compliance is not achieved: Not Applicable** |

| ~~SUB-R13~~ | ~~Subdivision of a site containing all or part of a Significant Natural Area identified in SCHED6 — Significant Natural Areas~~ | |
|---|---|---|
| ~~All zones~~ | ~~Activity status: Discretionary~~<br>~~Where:~~<br>~~DIS-1~~<br>~~An identified building platform is provided;~~ ~~and~~<br>~~DIS-2~~<br>~~All vehicle access and building platforms are located outside of the Significant Natural Area;~~ ~~and~~<br>~~DIS-3~~<br>~~The Significant Natural Area is subject to suitable legal mechanisms that will ensure protection of the area in perpetuity.~~<br>~~*Note: This rule applies in addition to any other applicable Subdivision Rules.*~~ | ~~Activity status when compliance is not achieved: Non-Complying~~<br>~~Where:~~<br>~~NC-1~~<br>~~Compliance is not achieved with DIS-1, DIS-2 and/or DIS-3~~ |

| ~~SUB-R14~~ | ~~Subdivision of a site located fully or partially within the Coastal Environment~~ | |
|---|---|---|
| ~~All zones~~ | ~~Activity status: Discretionary~~<br>~~Where:~~<br>~~DIS-1~~<br>~~Located outside the Coastal Protection Overlay;~~<br>~~and~~<br>~~DIS-2~~<br>~~Located outside the Coastal Natural Hazard~~ | ~~Activity status when compliance is not achieved: Non-Complying~~<br>~~Where:~~<br>~~NC-1~~<br>~~Compliance is not achieved with DIS-1 and/or DIS-2~~ |

| | | |
|---|---|---|
| | ~~Overlay.~~<br>~~*Note: This rule applies in addition to any other applicable Subdivision Rules.*~~ | |

| **SUB-R15** | **Subdivision of a site located fully or partially in the Moeraki Land Instability Overlay — Low Risk or Very Low Risk Areas** | |
|---|---|---|
| **All zones (including the withdrawn General Rural Zone)** | **Activity status: Discretionary**<br>*Note: This rule applies in addition to any other applicable Subdivision Rules.*<br>*Note: Section 88 Information Requirements for Applications:*<br>*Pursuant to s88 of the RMA, any application for activities made under these provisions must provide, in addition to the standard information requirements, a geotechnical report that demonstrates the appropriateness of the site for the proposed development.* | **Activity status when compliance is not achieved: Not Applicable** |

| **SUB-R16** | **Subdivision of a site located fully or partially in the Surface Fault Rupture Hazard Awareness Overlay — Subdivision** | |
|---|---|---|
| **All zones (including the withdrawn General Rural Zone)** | **Activity status: Discretionary**<br>**Where:**<br>DIS-1<br>A zone of deformation associated with fault rupture is mapped at a scale of at least 1:10,000~~ to create a fault avoidance zone~~; **and**<br>DIS-2<br>The subdivision layout provides for future allotments, buildings and structures to be set back at least 20 metres from the zone of deformation of the fault rupture on the downthrown side of the fault and 100 metres from the zone of deformation of the fault rupture on the upthrown side of the fault.<br>*Note: This rule applies in addition to any other applicable Subdivision Rules.* | **Activity status when compliance is not achieved: Non-Complying**<br>**Where:**<br>NC-1<br>Compliance is not achieved with DIS-1 and/or DIS-2 |
| *Note 1: A consent notice will be required as part of any subdivision consent.*<br><br>*Note 2: Pursuant to Section 88 of the Resource Management Act, any application made under this rule must be accompanied by a detailed fault investigation that has been prepared by a suitably qualified professional which sets out the results of a site-specific investigation undertaken including detailed fault mapping and assessment of its average recurrence interval. The investigation report must also be supplied to Canterbury Regional Council.* | | |

| **SUB-R17** | **Subdivision of a site located fully or partially in the Future Urban Growth Overlay** | |
|---|---|---|
| **All zones (including the withdrawn General Rural Zone)** | **Activity status: Discretionary**<br>*Note: This rule applies in addition to any other applicable Subdivision Rules.*<br>*Note: Section 88 Information Requirements for Applications:*<br>*Pursuant to s88 of the RMA, any application for activities made under these provisions must provide, in addition to the standard information requirements, a geotechnical report that demonstrates the appropriateness of the site for the proposed development.* | **Activity status when compliance is not achieved: Not Applicable** |

**NON-COMPLYING ACTIVITIES**

| SUB-R18 | Subdivision of a site located fully or partially within the Moeraki Land Instability Overlay — High-Risk and Very High-Risk Areas | |
|---|---|---|
| **All zones (including the withdrawn General Rural Zone)** | **Activity status: Non-Complying**<br>*Note: This rule applies in addition to any other applicable Subdivision Rules.*<br>*Note: Section 88 Information Requirements for Applications:*<br>*Pursuant to s88 of the RMA, any application for activities made under these provisions must provide, in addition to the standard information requirements, a geotechnical report that demonstrates the appropriateness of the site for the proposed development.* | **Activity status when compliance is not achieved: Not Applicable** |

## Standards

| SUB-S1 | Minimum allotment sizes and dimensions | |
|---|---|---|
| **Zone** | **Minimum lot size** | **Minimum dimensions** |
| **a. General Residential Zone** | 300m$^2$ net site area | 15m x 15m |
| **b. Medium Density Residential Zone** | 200m$^2$ net site area | None |
| **c. Settlement Zone** | 400m$^2$ net site area where the site is reticulated.<br><br>3000m$^2$ net site area where the site is not reticulated. | 15m x 15m |
| **d. Rural Lifestyle Zone** | 3000m$^2$ net site area where the site is reticulated, provided the average lot size is not less than 1 hectares; or<br><br>5000m$^2$ net site area where the site is not reticulated, providing the average lot size is not less than 1 hectare.<br><br>For the purpose of calculating any average, any allotment greater than 4 hectares, including the balance, is deemed to be 4 hectares. | N/A |
| **e. ~~General Rural Zone~~** | ~~20 ha net site area~~ | ~~N/A~~ |
| **f. ~~Rural Scenic Landscape and Significant Natural Features~~** | ~~40 ha net site area~~ | ~~N/A~~ |
| **g. ~~Outstanding Natural Features or Landscapes~~** | ~~100 ha net site area~~ | ~~N/A~~ |
| **h. Industrial** | N/A | N/A |
| **i. Local Centre Zone, Mixed Use Zone, Town Centre Zone, Large Format Retail Zone** | N/A | N/A |
| **j. Open Space Zone** | N/A | N/A |
| **k. Sport and Active Recreation Zone** | N/A | N/A |
| **l. Special Purpose Zone — Macraes Mining** | 20 ha net site area | N/A |

| SUB-S2 | Subdivision in the Otago Flood Assessment Overlay and Waitaki River Floodplain Assessment Overlay | |
|---|---|---|
| **All zones (including the withdrawn General Rural Zone)** | 1. Any new allotment must be entirely outside the Otago Flood Assessment Overlay or the Waitaki River Floodplain Assessment Overlay; or<br>2. If the new allotment(s) are partially within the Otago Flood Assessment Overlay, or Waitaki River Floodplain Assessment Overlay, the new allotment(s) must have a net site area capable of containing a complying residential unit and access entirely outside of the Flood Assessment Overlay or Waitaki River Floodplain Assessment Overlay. | **Matters of discretion are restricted to:**<br>1. the future use and development of the site; and<br>2. the ability to provide building platforms and access above the projected flood level; and<br>3. whether the effects of the hazard can be mitigated through minimum floor levels; and<br>4. potential risk to people, property and the environment during a flood event; and<br>5. the ability to access the site during a flood event; and<br>6. the effects of the subdivision on the ongoing maintenance of existing flood, erosion and drainage infrastructure or works. |

| SUB-S3 | Subdivision in the Canterbury Flood Assessment Overlay | |
|---|---|---|
| **All Zones (including the withdrawn General Rural Zone)** | 1. Any new allotment must be entirely outside the Canterbury Flood Assessment overlay; or<br>2. If the new allotment(s) are partially within the Canterbury Flood Assessment Overlay, the new allotment(s) must have a net site area capable of containing a complying residential unit and access entirely outside of the Canterbury Flood Assessment Overlay. | Matters of discretion are restricted to:<br>1. the future use and development of the site; and<br>2. the ability to provide building platforms and access above the projected flood level; and<br>3. whether the effects of the hazard can be mitigated through minimum floor levels; and<br>4. potential risk to people, property and the environment during a flood event; and<br>5. the ability to access the site during a flood event; and<br>6. the effects of the subdivision on the ongoing maintenance of existing flood, erosion, and drainage infrastructure or works. |

| SUB-S4 | Building platform | |
|---|---|---|
| **General Residential Zone**<br>**Medium Density Residential Zone** | 1. All vacant allotments must be able to contain a 10m x 15m building platform to accommodate a building that is located outside of:<br>a. a Floodplain Assessment Overlay, except for the Otago Flood Assessment Overlay and Waitaki River Floodplain Assessment Overlay<br>b. ~~a Significant Natural Area listed in SCHED6 — Significant Natural Areas~~<br>c. ~~an Outstanding Natural Feature or Landscape;~~<br>d. ~~the root protection area of a Notable Tree in SCHED 4 — Notable Trees;~~<br>e. the heritage setting of a Historic Heritage Item in SCHED2 — Historic Heritage Items<br>f. network utilities, including private and public lines;<br>g. an access lot, access strip, or accessway;<br>h. areas of esplanade reserves or esplanade strips required by SUB-S10;<br>i. a riparian margin;<br>j. setback requirements of the zone;<br>k. the National Grid Yard; and<br>l. the Electricity Distribution Yard. | **Matters of discretion are restricted to: Not Applicable** |

| SUB-S5 | Access | |
|---|---|---|
| **All zones (except General Rural Zone)** | 1. All allotments must have legal and physical access to a road.<br>2. any vehicle crossing shall comply with TRAN-R1 and TRAN-S13, TRAN-S14, TRAN-S15, TRAN-S16 and TRAN-S17.<br>*Note: SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice should be consulted to ensure compliance with the access dimensions required for fire appliances for developments where a fire appliance is not able to reach either the residential house or the source of firefighting water supply from the public road.* | **Matters of discretion are restricted to:**<br>1. the impact on the roading network; and<br>2. the location of the access; and<br>3. the ability for people to access the site; including any potential for that access to be affected by a natural hazard event; and<br>4. road user, cyclist and pedestrian access and safety. |

| SUB-S6 | Water Supply | |
|---|---|---|
| **All zones (except General Rural Zone)** | 1. Where a connection to reticulated water supply system is available, all new allotments must be provided with a water supply (including firefighting water supply) connection at the boundary of the net site area of the allotment; **or**<br>2. where a connection to reticulated water supply system is unavailable, all allotments shall be provided with a self-sufficient potable water supply, with a minimum volume of 10,000 litres (which includes firefighting water supply).<br>*Note: SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice should be consulted when determining the most appropriate design for firefighting water supply. The New Zealand Fire Service is available to assist with this.*<br>*Where water is to be taken from ground or surface water, resource consent from the Canterbury or Otago Regional Council may be required.* | **Matters of discretion are restricted to:**<br>1. the number and size of the allotments created; and<br>2. the provision of an alternative water supply that is safe, sanitary and sufficient to meet anticipated demand; and<br>3. any potential adverse effects on the environment and human health; and<br>4. any cumulative adverse effects. |

| SUB-S7 | Wastewater disposal | |
|---|---|---|
| **All zones (except General Rural Zone)** | 1. Where a connection to reticulated wastewater system is available, all new allotments must be provided with a connection at the allotment boundary; **or**<br>2. where a connection to reticulated wastewater system is unavailable and wastewater is to be disposed of on-site:<br>a. all allotments shall be provided with a septic tank, or soakage field, or an alternative means to dispose of sewage in a sanitary manner within the net site area of the allotment;<br>b. where sewage is to be disposed to ground, that area shall not be subject to instability, or inundation, or used for the disposal of stormwater;<br>c. either:<br>i. a certificate from a suitably qualified wastewater engineer shall be provided, certifying that on-site disposal can be achieved in accordance with the requirements of the relevant regional plan; or<br>ii. a copy of an approved resource consent for the on-site disposal from the relevant regional council shall be provided.<br>3. where a connection to reticulated wastewater system is unavailable, and wastewater is to be disposed of by way of a community wastewater scheme and separate wastewater disposal field, these must be legally held together in a manner that they cannot be disposed of separately from any allotment without the express permission of the Waitaki District Council.<br>*Note: Where disposal of wastewater is to land and/or water, resource consent from the Canterbury or Otago Regional Council may be required.* | **Matters of discretion are restricted to:**<br>1. the size of the allotments created; and<br>2. the provision of an alternative wastewater system that is safe, sanitary and sufficient to meet anticipated demand; and<br>3. any potential adverse effects on the environment and human health; and<br>4. any cumulative adverse effects. |

| SUB-S8 | Stormwater management | |
|---|---|---|
| **All zones (except General Rural Zone)** | 1. Stormwater management must be provided in accordance with the Standards in the Stormwater chapter.<br>2. where a connection to a reticulated stormwater management system is available, all new allotments must be provided with a connection at the allotment boundary.<br>3. where a connection to stormwater systems is not available and the means of stormwater disposal is to ground, that part of the site must not be identified on the Planning Maps as being subject to instability or inundation, or be used for the disposal of wastewater.<br>*Note: the Otago Regional Plan: Water also has rules for the disposal of stormwater.* | **Matters of discretion are restricted to:**<br>1. any relevant matters of discretion for non-compliance with the Standards in the Stormwater chapter; and<br>2. the size and scale of the development and the additional stormwater that the proposal will generate, compared to the existing situation; and<br>3. the capacity of the local stormwater network and the need for any upgrades; and<br>4. the adverse effects of stormwater on an adjoining property or road;<br>5. any potential impacts on a downstream flooding hazard from the proposed stormwater disposal from the site; and<br>6. any potential adverse effects on a downstream flooding hazard, the environment and human health from the proposed stormwater disposal from the new allotments. |

| SUB-S9 | Electricity and telecommunications | |
|---|---|---|
| **General Residential Zone**<br><br>**Medium Density Residential Zone** | 1. All allotments must have provision for:<br>a. fibre optic cable connections; and<br>b. electricity connections.<br>2. where two or more allotments share an accessway, the fibre optic cable or electricity connection must be available from where the accessway joins the main body of each allotment. | **Matters of discretion are restricted to:**<br>1. the provision of alternative solutions. |
| **All other zones (except General Rural Zone)** | 3. All allotments must have provision for:<br>a. Telecommunication connections; and<br>b. Electricity connections.<br>4. where two or more allotments share an accessway, the telecommunication or electricity connection must be available from where the accessway joins the main body of each allotment. | **Matters of discretion are restricted to:**<br>1. the provision of alternative solutions |

| SUB-S10 | Esplanade reserves and esplanade strips | |
|---|---|---|
| **All zones (except General Rural Zone)** | 1. Where a subdivision of land creates an allotment (including any balance allotment) that is less than 4ha in area and which adjoins the bank(s) of a waterbody over 3m in width, that allotment must set aside an esplanade reserve or esplanade strip with a minimum width of 20 metres.<br>2. where a subdivision of land creates an allotment (including any balance allotment) that is less than 4ha in area and which adjoins Mean High Water Springs, that allotment must set aside an esplanade reserve or esplanade strip with a minimum width of 20 metres. | **Matters of discretion are restricted to: Not Applicable** |

# Appendix 2
# Recommended Responses to Submissions

# Appendix 2
# Recommended Responses to Submissions

## Contents

Subdivision ..... 2

# Subdivision

| Sub | Submitter | Section | Provision | Position | Summary of Submission | Relief/Decision Sought Summary | Recommendation |
|---|---|---|---|---|---|---|---|
| **122.3** | Kitty Culp | Subdivision | Enable subdivision that creates allotments which: reflect the intended pattern of development and | Amend | Amend the Subdivision Chapter to emulate Waimate's District Plan to encourage clustered growth around towns with required reticulated infrastructure, supporting sustainable and cost-effective expansion. Waimate's density and servicing Rules help protect water quality and reduce the impact of septic systems. Waimate DC provides clear, enforceable Standards that give landowners and developers confidence. | Amend the Subdivision Chapter to permit existing Waimate District Plan provision gaps. | Reject |
| **51.36** | James White | Subdivision | General | Amend | Considers that WDC should: consider implementing a flat-rate FC for subdivisions and development, rather than the current model based on property value percentages, to provide cost certainty, efficient administration, and promote economic development and include FC provisions in the Plan (or though. Alternatively, provide draft FC Plan Section provisions for public consultation and consider fair, geographically proportionate FCs. | Amend the Plan to include flat-rate FC subdivision provisions in the Plan for transparency. Alternatively, provide an FC Section containing district-wide provisions that cover the situations where Council will take financial contributions for development for public consultation with geographically proportionate FCs. It is noted that WDC's Development and Financial Contributions Policy 2025 which is part of the LTP contains information about financial contributions funding. | Reject |
| **96.4** | Cat Prunty | Subdivision | General | Amend | Considers that the SUB Chapter should be amended to clarify that for aspects in design and layout, allowance is made for full scrutiny of an application as part of the consent process. | Amend SUB Chapter to remove references to public notification preclusion under s95A of the RMA.<br>[Inferred relief requested] | Reject |
| **106.1** | James White | Subdivision | General | Amend | Considers that SUB should have objectives and policies for subdivision in flood hazard areas, liquefaction areas and Moeraki in High Risk Areas (as a Non-Complying Activity). | Seeks that SUB objectives and policies are amended to also include objectives and policies for subdivision in flood hazard areas, liquefaction areas and Moeraki in High Risk Areas in order to support the Rules. | Reject |
| **122.1** | Kitty Culp | Subdivision | General | Amend | Considers that rural subdivision rules should allow greater flexibility for non-farmable or marginal land so lifestyle use or environmental protection can occur without undermining the productive farm base. Considers that enabling amalgamations, boundary adjustments, and subdivision of pre-1989 farm dwellings (≥1 ha with self-contained services) would support retirement and succession planning, strengthen productive units, and let older generations remain in their homes while improving land-use efficiency. Considers that sub-10 ha blocks near residential areas (e.g., Kurow—including Hillies Rd—North Ōamaru, and Moeraki Boulders) are better managed as rural-residential with targeted rezoning/overlays to allow controlled 1–2 ha lifestyle subdivisions, reflecting limited farming viability and responding to existing lifestyle demand. [refer to original submission for full reasons] | Seeks to enable greater flexibility for the subdivision of rural land that is clearly unsuitable for productive farming (e.g. steep gullies, native-covered hillsides, erosion-prone forested areas, or creek-laced terrain), allowing such land to be used for appropriate lifestyle, conservation, or rural-residential purposes without compromising the productive rural base.<br>Seeks to introduce rules that allow: Amalgamation of adjoining farms without requiring the purchase or sale of existing dwellings. Boundary adjustments between lifestyle blocks and farms that do not result in new titles but enhance the productive use of land and maintain rural housing options for older residents.<br>Seeks to permit the subdivision of farmhouses onto separate titles of no less than 1 hectare, provided: The dwelling was constructed before 31 December 1989.- All wastewater and stormwater infrastructure is contained within the proposed boundary.<br>Seeks to reclassify or allow controlled subdivision of blocks under 10 hectares bordering residential areas, acknowledging that such blocks are often not viable for commercial farming and better serve rural-residential needs.<br>Seeks to introduce targeted overlays or rezoning provisions to enable controlled subdivision into 1-hectare lifestyle blocks in: - Kurow, including land along Hillies Road to accommodate lifestyle-farm boundary transitions. North Oamaru, where peri-urban expansion pressure and existing semi-rural characteristics support reclassification. | Reject |
| **166.91** | Horticulture New Zealand | Subdivision | General | Amend | Considers transferable titles and subdivision rights can be used to avoid the loss and fragmentation of HPL. [See original submission for full details] | Add provisions to enable the transfer of titles. | Reject |
| **194.71** | Director-General of Conservation | Subdivision | General | Support | Support in part. Considers the proposed provisions generally provide an appropriate level of control for subdivision. | Retain as notified, except where specific changes are requested below. | Reject |
| **246.203** | Federated Farmers of New Zealand Incorporated | Subdivision | General | Support | The submitters support in part, seeking clearer explanation of the SUB chapter's purpose. They want the introduction to identify the specific resource-management issues the SUB provisions address and consider that stronger policy direction is needed to justify the SASM rules. Noting in the General Rural Zone, key issues include fragmentation of highly productive land, loss of land used for primary production, and reverse-sensitivity effects from nearby residential or urban activities. | The submitters seek amendment of the SUB Introduction such that it better describes the resource management issue the NATC provisions seek to address, as manifested in the Waitaki District, or alternatively, include issues (i.e. SUB-XX-I1) expressed before the objectives. | Reject |

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| **246.204** | Federated Farmers of New Zealand Incorporated | Subdivision | General | Support | They consider the District Plan should provide stronger, more detailed policy guidance to support rules, noting that while high-level policies exist in the District-Wide Matters chapters, they do not give sufficient direction for users or decision-makers, and there is no policy guidance at all for subdivision in the Notable Trees chapter. | The submitters seek inclusion of additional SUB policy direction to clarify and support requirements in the SUB rules and to provide clear direction to consent applicants and decision-makers. | Reject |
| **286.7** | S J B Munro Family Trust | Subdivision | General | Amend | Considers that the property [Lot 19 DP 537006] at approximately 14.6 hectares has unusual shape with a long western finger that bottlenecks the eastern, making it ideal for splitting the site in two.<br><br>Considers that this outcome is not supported by the PDP, which sets a minimum allotment size of 20 hectares in the General Rural Zone, increasing to 40 hectares where the Rural Scenic Landscape Overlay applies. | Seeks a consenting pathway for the subdivision of the Site to create a further resultant allotment. As part of this relief:<br><br>(i) to reduce the minimum site size for the Site or other sites located within a Rural Scenic Overlay and in the General Rural Zone to provide for that outcome; | Reject |
| **286.8** | S J B Munro Family Trust | Subdivision | General | Amend | Considers that the property [Lot 19 DP 537006] at approximately 14.6 hectares has unusual shape with a long western finger that bottlenecks the eastern, making it ideal for splitting the site in two.<br><br>Considers that this outcome is not supported by the PDP, which sets a minimum allotment size of 20 hectares in the General Rural Zone, increasing to 40 hectares where the Rural Scenic Landscape Overlay applies.<br><br>Considers that subdivision of the Property under the PDP would require resource consent as a discretionary activity in accordance with SUB-R10, however, any such consent is likely to be declined, regardless of its merits, due to the strong policy direction in the Subdivision Chapter, as outlined in points 4.1 to 4.9. | Seeks a consenting pathway for the subdivision of the Site to create a further resultant allotment. As part of this relief:<br><br>(ii) Amend the activity status for subdivision for subdivision located within a Rural Scenic Overlay and in the General Rural Zone to Restricted Discretionary, with matters of control to include consideration of site specific constraints on reasonable use, as detailed in this submission. | Reject |
| **107.6** | Cameron Leckie | Subdivision | Subdivision is serviced by infrastructure that has sufficient capacity for the development of the l | Amend | For SUB-O3:<br><br>Opposes the requirement in the PDP that all services (road access, water, wastewater, stormwater, electricity, telecommunications) must be physically installed at the time of subdivision for Business and Industrial land.<br><br>A more flexible and practical approach that aligns with the realities of business development while ensuring infrastructure can be efficiently provided when required should be provided as business needs vary; the specific servicing needs of future businesses cannot always be accurately predicted at subdivision stage. Forcing early installation often results in poorly located infrastructure that must be reconfigured later to suit actual end users; it is inefficient and costly.<br><br>Current rules encourage unnecessary infrastructure placement simply to satisfy regulatory requirements. This adds avoidable costs, as services may later be ripped out or repositioned to fit specific site layouts, making the process inefficient and uneconomical. Regardless, Physical service connections are required prior to BC or occupation of new buildings. | Amend SUB-O3 as follows (or words to that effect):<br><br>SUB-O3 Infrastructure<br><br>Subdivision is serviced by infrastructure that has sufficient capacity for the development of the land and has been planned with a requirement for evidence demonstrating that services can be provided efficiently and affordably in the future ~~or provided for in an integrated manner to be in place or installed at the time of the proposed subdivision~~. | Reject |
| **149.4** | Malcolm John McKenzie | Subdivision | SUB-O1 Subdivision Subdivision creates allotments and patterns of land development that ar | Support | Supports in part SUB-O1 and considers that the objective should state that where there is a right-of-way, that all parties should be notified. | Retain SUB-O1 (Subdivision) and amend to include a requirement to notify all affected parties where there is a right-of-way. | Reject in part |
| **194.72** | Director-General of Conservation | Subdivision | SUB-O1 Subdivision Subdivision creates allotments and patterns of land development that ar | Support | Supports SUB-O1 'Subdivision' as being in line with the overall strategic objectives of the Plan, Spatial Plan and Regional Policy Statements in that recognition of the objectives of overlays will help ensure that areas with high values (such as Indigenous biodiversity and Landscape) are appropriately provided for in subdivision design and layout. | Seeks that SUB-O1 'Subdivision' is retained in its entirety. | Accept in part |
| **246.205** | Federated Farmers of New Zealand Incorporated | Subdivision | SUB-O1 Subdivision Subdivision creates allotments and patterns of land development that ar | Support | The submitters support in part. They agree with SUB-O1's focus on site size and zoning but concerned regarding overlay mapping captures large areas of productive farmland. They argue that subdivision itself does not affect overlays; rather, it is subsequent activities—buildings, earthworks, vegetation clearance—that may create effects, and these are already managed through the relevant overlay chapters. | The submitters seek amendment of SUB-O1 as follows:<br><br>Subdivision creates allotments and patterns of land development that are compatible with the purpose, character and qualities of each zone ~~and achieve the objectives of overlays~~ | Accept |
| **253.135** | Royal Forest and Bird Protection Society of New Zealand Incorporated | Subdivision | SUB-O1 Subdivision Subdivision creates allotments and patterns of land development that ar | Support | Supports in part:<br><br>The submitter seeks insertion of policies into the objective. | Amend SUB-O1 as follows: | Reject |

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| | | | | | | Subdivision creates allotments and patterns of land development that are compatible with the purpose, character and qualities of each zone and achieve the objectives and policies of overlays | |
| **253.136** | Royal Forest and Bird Protection Society of New Zealand Incorporated | Subdivision | SUB-O1 Subdivision Subdivision creates allotments and patterns of land development that ar | Support | Supports in part:<br>The submitter seeks to insert policies into the objective. | Amend SUB-O1 as follows:<br>Subdivision creates allotments and patterns of land development that are compatible with the purpose, character and qualities of each zone and achieve the objectives and policies of overlays. | Accept in part |
| **271.388** | Canterbury Regional Council | Subdivision | SUB-O1 Subdivision Subdivision creates allotments and patterns of land development that ar | Support | Supports SUB-O1 'Subdivision' as it gives effect to CRPS Objective 5.2.1 and Policies 5.3.1 and 5.3.2 concerning growth, location, design, development conditions and function of development. | Retain SUB-O1 'Subdivision' as notified. | Accept in part |
| **305.138** | Erin Nivonne Schultz | Subdivision | SUB-O1 Subdivision Subdivision creates allotments and patterns of land development that ar | Support | Supports the intent for subdivisions to be appropriate to the zone. | Seeks to retain as notified. | Accept in part |
| **306.138** | Waitaki Property Guardians Incorporated | Subdivision | SUB-O1 Subdivision Subdivision creates allotments and patterns of land development that ar | Support | Supports the intent for subdivisions to be appropriate to the zone. | Seeks to retain as notified. | Accept in part |
| **183.44** | Beverley Anne Thomson | Subdivision | SUB-O1 Subdivision Subdivision creates allotments and patterns of land development that ar | Oppose | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br>Subdivision creates allotments and patterns of land development that are compatible with the purpose, character and qualities of each zone and achieve the objectives of overlays (except in relation to any land which is scheduled wāhi tūpuna in SCHED5 – Sites and Areas of Significance to Māori, where the land is privately owned or residentially or rurally zoned). | Reject |
| **270.42** | Vivien Ann Paton & Graeme John Paton | Subdivision | SUB-O1 Subdivision Subdivision creates allotments and patterns of land development that ar | Amend | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br>Subdivision creates allotments and patterns of land development that are compatible with the purpose, character and qualities of each zone and achieve the objectives of overlays (except in relation to any land which is scheduled wāhi tūpuna in SCHED5 – Sites and Areas of Significance to Māori, where the land is privately owned or residentially or rurally zoned). | Reject |
| **273.59** | Colin and Catherine Harvey | Subdivision | SUB-O1 Subdivision Subdivision creates allotments and patterns of land development that ar | Oppose | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br>Subdivision creates allotments and patterns of land development that are compatible with the purpose, character and qualities of each zone and achieve the objectives of overlays (except in relation to any land which is scheduled wāhi tūpuna in SCHED5 – Sites and Areas of Significance to Māori, where the land is privately owned or residentially or rurally zoned). | Reject |
| **274.59** | Garrie Alexander Farmer and Marilyn Anne Farmer | Subdivision | SUB-O1 Subdivision Subdivision creates allotments and patterns of land development that ar | Oppose | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br>Subdivision creates allotments and patterns of land development that are compatible with the purpose, character and qualities of each zone and achieve the objectives of overlays (except in relation to any land which is scheduled wāhi tūpuna in SCHED5 – Sites and Areas of Significance to Māori, where the land is privately owned or residentially or rurally zoned). | Reject |
| **275.45** | Mark & Nicky Hay | Subdivision | SUB-O1 Subdivision Subdivision creates allotments and patterns of land development that ar | Amend | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br>Subdivision creates allotments and patterns of land development that are compatible with the purpose, character and qualities of each zone and achieve the objectives of overlays (except in relation to any land which is scheduled wāhi tūpuna in SCHED5 – Sites and Areas of Significance to Māori, where the land is privately owned or residentially or rurally zoned). | Reject |
| **276.45** | Patrick Ronald Winders & Joan Patricia Winders | Subdivision | SUB-O1 Subdivision Subdivision creates | Amend | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that | Seeks to amend as follows: | Reject |

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| | | | allotments and patterns of land development that ar | | neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Subdivision creates allotments and patterns of land development that are compatible with the purpose, character and qualities of each zone and achieve the objectives of overlays (except in relation to any land which is scheduled wāhi tūpuna in SCHED5 – Sites and Areas of Significance to Māori, where the land is privately owned or residentially or rurally zoned). | |
| **277.45** | Anthony & Jennifer Jane Hales | Subdivision | SUB-O1 Subdivision Subdivision creates allotments and patterns of land development that ar | Amend | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br>Subdivision creates allotments and patterns of land development that are compatible with the purpose, character and qualities of each zone and achieve the objectives of overlays (except in relation to any land which is scheduled wāhi tūpuna in SCHED5 – Sites and Areas of Significance to Māori, where the land is privately owned or residentially or rurally zoned). | Reject |
| **278.45** | Colin Willetts & Catherine Anderson | Subdivision | SUB-O1 Subdivision Subdivision creates allotments and patterns of land development that ar | Amend | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br>Subdivision creates allotments and patterns of land development that are compatible with the purpose, character and qualities of each zone and achieve the objectives of overlays (except in relation to any land which is scheduled wāhi tūpuna in SCHED5 – Sites and Areas of Significance to Māori, where the land is privately owned or residentially or rurally zoned). | Reject |
| **279.59** | Paul Joseph Rutledge | Subdivision | SUB-O1 Subdivision Subdivision creates allotments and patterns of land development that ar | Amend | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br>Subdivision creates allotments and patterns of land development that are compatible with the purpose, character and qualities of each zone and achieve the objectives of overlays (except in relation to any land which is scheduled wāhi tūpuna in SCHED5 – Sites and Areas of Significance to Māori, where the land is privately owned or residentially or rurally zoned). | Reject |
| **307.43** | Allan Gordon King & Erina Margaret King | Subdivision | SUB-O1 Subdivision Subdivision creates allotments and patterns of land development that ar | Amend | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br>Subdivision creates allotments and patterns of land development that are compatible with the purpose, character and qualities of each zone and achieve the objectives of overlays (except in relation to any land which is scheduled wāhi tūpuna in SCHED5 – Sites and Areas of Significance to Māori, where the land is privately owned or residentially or rurally zoned). | Reject |
| **149.5** | Malcolm John McKenzie | Subdivision | SUB-O2 Subdivision design Subdivision occurs in a sequenced and coherent manner and is | Amend | Supports in part SUB-O2 and considers that the objective should state that where there is a right-of-way, that all parties should be notified. | Retain SUB-O2 (Subdivision design) and amend to include a requirement to notify all affected parties where there is a right-of-way. | Reject |
| **163.43** | Fire and Emergency New Zealand | Subdivision | SUB-O2 Subdivision design Subdivision occurs in a sequenced and coherent manner and is | Support | Supports as notified as accessible subdivisions with good quality urban design, an efficient safe and accessible layout and design which provides for the health and well-being of communities enables the submitter to meet their objectives and their functions under the Fire and Emergency New Zealand Act 2017 with SUB-O2 (2)(4)(7)(8) specifically supported.<br>[See original submission for full reasons] | Retain as notified. | Accept |
| **164.4** | NPHS Te Waipounamu | Subdivision | SUB-O2 Subdivision design Subdivision occurs in a sequenced and coherent manner and is | Support | Support for (1.) (b.) as solar gain for dwellings is conductive to warm homes which reduces the risk of hospital admissions amenable to housing. Supports (8.) as it provides for the health and wellbeing of communities and supports (10.) as it seeks to maintain or enhance the productive capacity of HPL and food security is an issue. | Retain as notified. | Accept |
| **166.37** | Horticulture New Zealand | Subdivision | SUB-O2 Subdivision design Subdivision occurs in a sequenced and coherent manner and is | Amend | Considers that to maintain rural character there needs to be specific outcomes which require avoidance where practicable or mitigation where avoidance is not practicable of reverse sensitivity effects of subdivision on existing lawfully established activities.<br>Considers this necessary and applicable at all zone interfaces and between activities. [See original submission for full reasons]. | Add as follows:<br>Subdivision occurs in a sequenced and coherent manner and is designed so that it:<br>...<br>11. Ensures that reverse sensitivity effects of subdivision on permitted and existing lawfully established activities are avoided where practicable, or mitigated where avoidance in not practicable. | Reject |
| **194.73** | Director-General of Conservation | Subdivision | SUB-O2 Subdivision design Subdivision occurs in a | Oppose | Opposes in part SUB-O2 'Subdivision design' as being anthropocentric and should be amended to recognise natural values as well in subdivision design. | Add a new subclause as follows, or words to like effect: | Reject |

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| | | | sequenced and coherent manner and is | | Adding reference to natural values would improve alignment with the subsequent policies which refer to natural values. It would also provide useful recognition of natural values for Policies SUB-P13 to P15 and Rules SUB-R4, SUB-R5 and SUB-R10 to R14, which do not refer to natural values but where natural values may be present. | "Subdivision occurs in a sequenced and coherent manner and is designed so that it:<br>1 Reflects and responds to ...<br>a. the physical characteristics and constraints of the site; and<br>b. considerations for passive solar gain for dwellings in the subdivision; and<br>c. the character and amenity values of the surrounding area; and<br>d. the natural values of the site and surrounding area; and..." | |
| **195.26** | New Zealand Pork Industry Board | Subdivision | SUB-O2 Subdivision design Subdivision occurs in a sequenced and coherent manner and is | Oppose | Oppose in part as SUB-O2 references to the need to maintain rural character but has no specific outcome that requires avoidance where practicable, or mitigation where avoidance is not practicable of reverse sensitivity effects of subdivision on existing lawfully established activities. This is necessary to support SUB-P12 and applicable at all existing and future zone interfaces and between activities | Seeks to amend the objective as follows:<br>11. Ensures that reverse sensitivity effects of subdivision on permitted and existing lawfully established activities are avoided where practicable, or mitigated where avoidance in not practicable. | Reject |
| **242.27** | Ministry of Education Te Tāhuhu o Te Mātauranga | Subdivision | SUB-O2 Subdivision design Subdivision occurs in a sequenced and coherent manner and is | Support | Support this objective in principle as it seeks to ensure that subdivision is sequenced appropriately and supported by the required infrastructure.<br>Specifically supports SUB-O2 (8) as it implicitly considers the provision of education through 'well-being' while seeking more overt consideration of the need for educational facilities.<br>Seeks to add an additional clause requiring subdivision occurs in a sequenced and coherent manner and to be designed in a way that it promotes accessibility to social infrastructure. | Seeks to amend as follows:<br>...<br>8. provides for the health and well-being of communities; and<br>9. provides accessible, usable and well-designed open space areas;~~and~~<br>10. maintains or enhances the productive capacity of highly productive land.;~~and~~<br>11. growth and development are supported by educational facilities. | Reject |
| **246.206** | Federated Farmers of New Zealand Incorporated | Subdivision | SUB-O2 Subdivision design Subdivision occurs in a sequenced and coherent manner and is | Support | The submitters support in part. They agree with SUB-O2's recognition that rural subdivision should maintain rural character, but seek clearer direction. They want "rural character" defined to include all activities with a functional need to be in the rural zone. They also note that subdivision must address fragmentation, loss of productive potential, and reverse-sensitivity effects, not just issues relating to highly productive land. They request amendments to condition 10 to ensure consistency with NPS-HPL Policy 8, which requires protecting highly productive land from inappropriate use and development. | The submitters seek amendment of SUB-O2 as follows:<br>Subdivision occurs in a sequenced and coherent manner and is designed so that it:<br>1. reflects and responds to:<br>a. the physical characteristics and constraints of the site; and<br>b. considerations for passive solar gain for dwellings in the subdivision; and<br>c. the character and amenity values of the surrounding area; and<br>2. is accessible and is connected to and integrated with existing communities and the transport network; and<br>3. consolidates urban development; and<br>4. promotes good quality urban design; and<br>5. maintains rural character in rural areas; and<br>6. avoids the sprawl of existing settlements or creation of new settlements; and<br>X. manages the potential for reverse sensitivity issues to arise; and<br>7. has an efficient, safe and accessible layout; and<br>8. provides for the health and well-being of communities; and<br>9. provides accessible, usable and well-designed open space areas; and<br>10. maintains or ~~enhances~~ protects the productive capacity of highly productive land; and<br>X. avoids or minimises fragmentation of rural land and the loss of any productive potential. | Reject |
| **253.137** | Royal Forest and Bird Protection Society of New Zealand Incorporated | Subdivision | SUB-O2 Subdivision design Subdivision occurs in a sequenced and coherent manner and is | Oppose | Opposes in part:<br>The submitters seek amendments to the objective. | Amend SUB-O2 as follows:<br>Subdivision occurs in a sequenced and coherent manner and is designed so that it:<br>...<br>9. provides accessible, usable and well-designed open space areas; and<br>10.integrates with the natural environment, increase indigenous vegetation cover, and restores or enhances indigenous biodiversity; and | Reject |

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| | | | | | | 11. maintains or enhances the productive capacity of highly productive land. | |
| **271.389** | Canterbury Regional Council | Subdivision | SUB-O2 Subdivision design Subdivision occurs in a sequenced and coherent manner and is | Support | Supports SUB-O2 'Subdivision design' as it gives effect to CRPS Policies 5.3.1 and 5.3.3 (while noting that effects of subdivision on indigenous biodiversity and landscapes etc. are dealt with under those chapters). | Retain SUB-O2 'Subdivision design' as notified. | Accept |
| **305.139** | Erin Nivonne Schultz | Subdivision | SUB-O2 Subdivision design Subdivision occurs in a sequenced and coherent manner and is | Support | Support for good subdivision design. | Seeks to retain as notified. | Accept |
| **306.139** | Waitaki Property Guardians Incorporated | Subdivision | SUB-O2 Subdivision design Subdivision occurs in a sequenced and coherent manner and is | Support | Support for good subdivision design. | Seeks to retain as notified. | Accept |
| **193.11** | Ohau Company Trust (Shelton Downs Station) | Subdivision | SUB-O2 Subdivision design Subdivision occurs in a sequenced and coherent manner and is | Amend | Considers that subdivision, and the associated land use development that subdivision entails, as an objective, applies in an ONL. | Amend as follows:<br>Subdivision occurs in a sequenced and coherent manner and is designed so that it:<br>1. reflects and responds to:<br>a. the physical characteristics and constraints of the site; and<br>b. considerations for passive solar gain for dwellings in the subdivision; and<br>c. the character and amenity values of the surrounding area; and<br>2. is accessible and is connected to and integrated with existing communities and the transport network; and<br>3. consolidates urban development; and<br>4. promotes good quality urban design; and<br>5. maintains rural character in rural areas; and<br>6. Protects or enhances Outstanding Natural Features and Landscapes values; and<br>~~6.~~7. avoids the sprawl of existing settlements or creation of new settlements; and<br>~~7.~~8. has an efficient, safe and accessible layout; and<br>~~8.~~9. provides for the health and well-being of communities; and<br>~~9.~~10. provides accessible, usable and well-designed open space areas; and<br>~~10.~~11. maintains or enhances the productive capacity of highly productive land. | Accept in part |
| **152.52** | New Zealand Transport Agency Waka Kotahi | Subdivision | SUB-O3 Infrastructure Subdivision is serviced by infrastructure that has sufficient capaci | Support | Support the objective as drafted | Retain as notified | Accept |
| **163.45** | Fire and Emergency New Zealand | Subdivision | SUB-O3 Infrastructure Subdivision is serviced by infrastructure that has sufficient capaci | Support | Supports as notified. | Retain as notified. | Accept |
| **176.11** | Terramark Limited | Subdivision | SUB-O3 Infrastructure Subdivision is serviced by infrastructure that has sufficient capaci | Support | Supports SUB-O3 'Infrastructure' in part, however the submitter states it is entirely inappropriate and unnecessary to require the design and installation of onsite infrastructure and services to lots at the time of subdivision given the Building Consent process may not be contemporaneous. | Seeks that SUB-O3 'Infrastructure' is amended as follows:<br>In the urban environment, ~~S~~subdivision is serviced by infrastructure that has sufficient capacity for the development of the land and has been planned or provided for in an integrated manner to be in place or installed at the time of the proposed subdivision. | Reject |
| **243.94** | Whitestone Contracting Limited | Subdivision | SUB-O3 Infrastructure Subdivision is serviced by infrastructure that has sufficient capaci | Support | Considers that the infrastructure is critical to the ongoing prosperity of the district. | Retain as notified. | Accept |

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| **244.86** | Telecommunication Companies | Subdivision | SUB-O3 Infrastructure Subdivision is serviced by infrastructure that has sufficient capaci | Support | Considers that the objective appropriately recognises that subdivisions need to have access to infrastructure services such as telecommunication networks, and that those networks have capacity to meet the requirements of the additional demand being generated. | Retain as notified. | Accept |
| **246.207** | Federated Farmers of New Zealand Incorporated | Subdivision | SUB-O3 Infrastructure Subdivision is serviced by infrastructure that has sufficient capaci | Support | The submitters support in part. They agree upfront infrastructure may be appropriate in urban areas but say it is unnecessary for self-serviced rural land. GRUZ (and often LRZ) sites already manage water, wastewater, and stormwater privately at the building-consent stage, often years after subdivision, and future owners—not subdividers—decide layout and infrastructure needs.They consider it inappropriate to require onsite infrastructure design or installation at subdivision. Rural areas often use wireless telecommunications, and power connections can be costly, so some landowners may choose to be self-sufficient. | The submitters seek amendment of SUB-O3 as follows:<br>Subdivision is serviced by infrastructure that has sufficient capacity for the development of the land and has been planned or provided for in an integrated manner to be in place or installed at the time of the proposed subdivision.<br>Or alternatively, amend SUB-O3 to read:<br>In the urban environment, subdivision is serviced by infrastructure that has sufficient capacity for the development of the land and has been planned or provided for in an integrated manner to be in place or installed at the time of the proposed subdivision.<br>Alternatively, the submitters seek the Council provide alternative relief that excludes rural and other properties intended to be self-serviced from the requirement to install infrastructure at the time of the proposed subdivision. | Reject |
| **271.390** | Canterbury Regional Council | Subdivision | SUB-O3 Infrastructure Subdivision is serviced by infrastructure that has sufficient capaci | Support | Supports SUB-O3 'Infrastructure' as it gives effect to CRPS Policy 5.3.2 with regards to development conditions. | Retain SUB-O3 'Infrastructure' as notified. | Accept |
| **152.53** | New Zealand Transport Agency Waka Kotahi | Subdivision | SUB-O4 Subdivision and Regionally Significant Infrastructure Subdivision does not compromi | Support | Support the objective as drafted | Retain as notified | Reject |
| **233.68** | KiwiRail Holdings Limited | Subdivision | SUB-O4 Subdivision and Regionally Significant Infrastructure Subdivision does not compromi | Support | Supports the objective to protect 'Regionally significant infrastructure'. | Seeks to retain as notified. | Accept |
| **244.87** | Telecommunication Companies | Subdivision | SUB-O4 Subdivision and Regionally Significant Infrastructure Subdivision does not compromi | Support | Considers that protecting the regionally significant infrastructure is supported however it is a reverse sensitivity provision. Noting the definition of regionally significant infrastructure is sought to be deleted, the provision should be amended accordingly. | Seeks to amend as follows:<br>SUB-O4 Subdivision and~~Regionally Significant~~Infrastructure<br>Subdivision does not compromise the operation or safety of~~Regionally Significant~~Infrastructure. | Reject |
| **252.57** | Hollamby Family Trust | Subdivision | SUB-O4 Subdivision and Regionally Significant Infrastructure Subdivision does not compromi | Support | Supports the protection of regionally significant infrastructure. | Retain | Accept |
| **259.76** | Otago Regional Council | Subdivision | SUB-O4 Subdivision and Regionally Significant Infrastructure Subdivision does not compromi | Support | Considers that the policy's requirement to address subdivision effects on regional infrastructure is appropriate and will help ensure flood protection measures are properly accounted for. | Seeks to retain as notified. | Accept |
| **271.391** | Canterbury Regional Council | Subdivision | SUB-O4 Subdivision and Regionally Significant Infrastructure Subdivision does not compromi | Support | Supports SUB-O4 'Subdivision and Regionally Significant Infrastructure' as it gives effect to CRPS Objective 5.2.2 and Policy 5.3.2 concerning location, design, function of development and development conditions. | Retain SUB-O4 'Subdivision and Regionally Significant Infrastructure' as notified. | Accept |
| **294.81** | Meridian Energy Limited | Subdivision | SUB-O4 Subdivision and Regionally Significant Infrastructure Subdivision does not compromi | Support | Supports the objective and notes that renewable electricity generation is part of the definition of Regionally Significant Infrastructure and is consistent with the NPS-REG. | Retain as notified | Accept |
| **309.102** | Transpower New Zealand Limited | Subdivision | SUB-O4 Subdivision and Regionally Significant | Support | Supports the objective for subdivision and regionally significant infrastructure, aligning with NPSET. | Seeks to retain as notified. | Accept |

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| | | | Infrastructure Subdivision does not compromi | | | | |
| **165.91** | Bryry Trust | Subdivision | SUB-O5 Esplanade reserves and esplanade strips Esplanade reserves and esplanade strips | Support | Supports SUB-O5 'Esplanade reserves and esplanade strips' as it signals the type of subdivisions Waitaki District needs to improve its sustainability and liveability in support of the Subdivision Chapter objectives and policies. However, these may not always be appropriate and may have no value to the community. | Seeks an amendment to SUB-P9 'Esplanade reserves and esplanade strips' regarding creek bed widths. [SUB 165.5] | Reject |
| **194.74** | Director-General of Conservation | Subdivision | SUB-O5 Esplanade reserves and esplanade strips Esplanade reserves and esplanade strips | Support | Considers the objective and the related provisions will provide for the benefits of esplanade reserves and strips, including for both natural and human values. | Retain SUB-O5 'Esplanade reserves and esplanade strips' as notified. | Accept in part |
| **251.245** | Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki | Subdivision | SUB-O5 Esplanade reserves and esplanade strips Esplanade reserves and esplanade strips | Amend | Considers natural character should also be included as an outcome in the objective. Also considers access for Kāi Tahu to mahika kai resources is an outcome sought and is consistent with PORPS methods, including ECO-M5(3) and HCV-WT-M2(5). | Seeks to amend as follows:<br>Esplanade reserves and esplanade strips contribute to the maintenance, enhancement and protection of natural character, ecological, recreational and amenity values, public access, access to mahika kai and hazard management. | Accept |
| **252.58** | Hollamby Family Trust | Subdivision | SUB-O5 Esplanade reserves and esplanade strips Esplanade reserves and esplanade strips | Support | Supports SUB-O5 'Esplanade reserves and esplanade strips' as it signals the type of subdivisions Waitaki District needs to improve its sustainability and liveability in support of the Subdivision Chapter objectives and policies. However, these may not always be appropriate and may have no value to the community. | Support where there is an amendment to SUB-P9 | Accept in part |
| **255.20** | Bill and Angela Johnston | Subdivision | SUB-O5 Esplanade reserves and esplanade strips Esplanade reserves and esplanade strips | Support | Supports SUB-O5 'Esplanade reserves and esplanade strips' as it signals the type of subdivisions Waitaki District needs to improve its sustainability and liveability in support of the Subdivision Chapter objectives and policies. However, these may not always be appropriate and may have no value to the community. | Seeks an amendment to SUB-P9 'Esplanade reserves and esplanade strips'. | Accept in part |
| **256.38** | Fish and Game (Otago and Central South Island Fish and Game Councils) | Subdivision | SUB-O5 Esplanade reserves and esplanade strips Esplanade reserves and esplanade strips | Amend | Considers that stronger wording is required to encourage the development of esplanade strips. | Seeks to amend as follows: Promote esplanade reserves and esplanade strips to contribute to the maintenance, enhancement... | Reject |
| **258.29** | Bryce Burnett | Subdivision | SUB-O5 Esplanade reserves and esplanade strips Esplanade reserves and esplanade strips | Support | Supports SUB-O5 as it signals the type of subdivisions Waitaki District needs to improve its sustainability and liveability in support of the Subdivision Chapter objectives and policies. However, these may not always be appropriate and may have no value to the community. | Seeks an amendment to SUB-P9. | Accept in part |
| **287.112** | P K M Farms Limited | Subdivision | SUB-O5 Esplanade reserves and esplanade strips Esplanade reserves and esplanade strips | Support | Support is given in part for esplanade strips and reserves, but considers these may not always be appropriate or valuable to the community. | Seeks to retain as notified where there is an amendment to SUB-P9. | Accept in part |
| **271.392** | Canterbury Regional Council | Subdivision | SUB-P1 Creation of allotments Enable subdivision that creates allotments which: reflect t | Support | Supports SUB-P1 'Creation of allotments' as it gives effect to Policies CRPS 5.3.1 and 5.3.3 concerning growth and the management of development (while noting that the effects of subdivision on indigenous biodiversity and landscapes etc. are dealt with under those chapters). | Retain SUB-P1 'Creation of allotments' as has been notified. | Accept |
| **305.140** | Erin Nivonne Schultz | Subdivision | SUB-P1 Creation of allotments Enable subdivision that creates allotments which: reflect t | Support | Support in part. Considers that subdivision design should align with the anticipated development pattern of the zone. Considers that subdivision may also be appropriate where it reflects the surrounding environment. | Seeks to amend as follows:<br>Enable subdivision that creates allotments which:<br>1. reflect the existing or intended pattern of development and are consistent with the anticipated role, character and amenity values of the zone; and<br>... | Reject |
| **306.140** | Waitaki Property Guardians Incorporated | Subdivision | SUB-P1 Creation of allotments Enable subdivision that creates allotments which: reflect t | Support | Support in part. Considers that subdivision design should align with the anticipated development pattern of the zone. Considers that subdivision may also be appropriate where it reflects the surrounding environment. | Seeks to amend as follows:<br>Enable subdivision that creates allotments which:<br>1. reflect the existing or intended pattern of development and are consistent with the anticipated role, character and amenity values of the zone; and<br>... | Reject |

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| **166.38** | Horticulture New Zealand | Subdivision | SUB-P10 Esplanade reserves and esplanade strips – other waterbodies Consider the follow | Support | Supports in part but considers other matters including health and safety and potential constraints on HPL need to be provided for. | Add as follows:<br>Consider the following matters when determining whether to require the creation of an esplanade reserve or esplanade strip for subdivision of land adjoining any other waterbody over 3m in width:<br>...<br>3. Any health and safety risks or constraints on the ability to use highly productive land. | Reject |
| **246.210** | Federated Farmers of New Zealand Incorporated | Subdivision | SUB-P10 Esplanade reserves and esplanade strips – other waterbodies Consider the follow | Support | Support in part:<br>The submitters request clarification that esplanade reserves and strips are only a requirement for subdivisions less than 4 ha, in accordance with SUB-S10. | The submitters seek amendment of SUB-P10 as follows:<br>Consider the following matters when determining whether to require the creation of an esplanade reserve or esplanade strip for subdivision of land adjoining any other waterbody over 3m in width, where the subdivision creates an allotment of less than 4ha:<br>... | Reject |
| **251.246** | Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki | Subdivision | SUB-P10 Esplanade reserves and esplanade strips – other waterbodies Consider the follow | Amend | Considers contribution to natural character is a relevant consideration and is consistent with PORPS methods, including ECO-M5(3) and HCV-WT- M2(5). | Seeks to amend as follows:<br>the level of contribution to enable public access, recreational use or the protection of conservation, natural character or takata whenua values, including access to mahika kai; | Accept |
| **271.401** | Canterbury Regional Council | Subdivision | SUB-P10 Esplanade reserves and esplanade strips – other waterbodies Consider the follow | Support | Supports SUB-P10 'Esplanade reserves and esplanade strips – other waterbodies' as it gives effect to CRPS Objective 10.2.4 and Policy 10.3.5 that deal with public and customary access along rivers, beds and lakes. | Retain SUB-P10 'Esplanade reserves and esplanade strips – other waterbodies' as notified. | Accept in part |
| **251.247** | Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki | Subdivision | SUB-P11 Reductions or waivers of esplanade reserves and esplanade strips Only allow for | Amend | Considers the policy is unclear and in need of restructuring to better reflect criteria for exemptions and waivers. The submitter considers natural character and amenity values important but warns clause 6 may create disincentives. [refer to original submission for full reasons] | Seeks to amend as follows:<br>Only allow for exemption from the provision of an esplanade strip, a reduction or waiver in the width, or provision of any required esplanade reserve or esplanade strip, where it can be demonstrated, if relevant, that:<br>1. safe public and customary access and recreational use is already possible and can be maintained for the future; and<br>2. in the case of an exemption, reduction or waiver for an esplanade reserve, an esplanade strip would better provide for public and customary access, recreation, hazard management, stormwater management and ecological values; and<br>3. the ecological values, natural character and landscape features of the land adjoining the coast or other waterbody will not be adversely affected; and<br>4. any scheduled Historic Heritage Items in SCHED2 – Historic Heritage Items, or scheduled wāhi tūpuna in SCHED5 – Sites and Areas of Significance to Māori will not be adversely affected; and<br>5. the reduced width of the esplanade reserve or esplanade strip is sufficient to manage the risk of adverse effects resulting from natural hazards, taking into account the likely long-term effects of climate change; and<br>~~6. a full width esplanade reserve or esplanade strip is not required to maintain the natural character and amenity values of the Coastal Environment~~; and ... | Reject |
| **271.402** | Canterbury Regional Council | Subdivision | SUB-P11 Reductions or waivers of esplanade reserves and esplanade strips Only allow for | Support | Supports SUB-P11 'Reductions or waivers of esplanade reserves and esplanade strips' as it gives effect to CRPS Objective 10.2.4 and Policy 10.3.5 concerning public and customary access along rivers, beds and lakes. | Retain SUB-P11 'Reductions or waivers of esplanade reserves and esplanade strips' as notified. | Accept |
| **165.94** | Bryry Trust | Subdivision | SUB-P11 Reductions or waivers of esplanade reserves and esplanade strips Only allow for | Oppose | Considers that SUB-P11 'Reductions or waivers of esplanade reserves and esplanade strips' is opposed as drafted as if the Subdivision does not affect SASM SCHED5 Values then there is no reason for a reduction. | Amend SUB-P11 'Reductions or waivers of esplanade reserves and esplanade strips' as follows:<br>Activity status: ~~Discretionary~~ Permitted<br>PER-1 – where the subdivision does not impact the listed values associated with the identified SASM;<br>Activity status where PER-1 is not achieved: Discretionary | Reject |

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| **83.17** | Waitaki District Council | Subdivision | SUB-P12 Subdivision Design Ensure that subdivision is designed and located to: maximis | Amend | Submitter seeks to amend policy for grammatical consistency | Submitter seeks the following amendment:<br>"Ensure that subdivision is designed and located to:<br>1. maximise accessibility and connectivity with the surrounding community through walkways, cycleways and an interconnected transport network; and<br>2. reflect and respond to physical site characteristics, constraints and opportunities; and<br>3. minimise earthworks and land disturbance by designing building platforms that integrate into the natural landform; and<br>4. achieve hydraulic neutrality in urban zones; and<br>5. align streets and design open spaces to focus on significant views or landmarks; and<br>6. create allotment sizes and shapes that support a range of housing types and sizes and appropriate business activities; and<br>7. when within any scheduled wāhi tūpuna in SCHED5 – Sites and Areas of Significance to Māori for any greenfield subdivision, incorporate mātauraka Māori principles and provide opportunities to maintain or strengthen the relationship of takata whenua with their ancestral lands, water, sites, wāhi tapu, wāhi tūpuna and other taoka, where these have been identified through engagement with takata whenua and the subdivision has the potential to compromise takata whenua values and interests; and<br>8. minimise future conflicts with roading and infrastructure, including as a result of the planting of new vegetation; and<br>9. maximise sunlight access, outlook and amenity, including opportunities for future buildings to maximise solar gain, reduce energy and water consumption, and use renewable energy; and<br>10. provide public open spaces that are within walkable distance (400-800m) from residential allotments; and<br>11. provide sufficient separation from zone boundaries and transport networks to minimise the potential for any reverse sensitivity effects and/or conflict with existing and permitted activities on adjoining sites; and<br>12. be consistent with any relevant design guidelines which promote good planning, building design and urban design that give effect to the New Zealand Urban Design Protocol (2005); and<br>13. incorporate principles of Crime Prevention Through Environmental Design to achieve safe environments. " | Accept |
| **163.48** | Fire and Emergency New Zealand | Subdivision | SUB-P12 Subdivision Design Ensure that subdivision is designed and located to: maximis | Support | Seeks an addition to ensure that subdivision is designed and located to provide adequate emergency service access. | Amend as follows:<br>Ensure that subdivision is designed and located to:...<br>14. provide adequate emergency service access. | Reject |
| **164.9** | NPHS Te Waipounamu | Subdivision | SUB-P12 Subdivision Design Ensure that subdivision is designed and located to: maximis | Support | Supports (10.) as open space within a walkable distance of homes is an enabler for physical activity and a lack of physical activity is a risk factor for health issues. | Retain as notified. | Accept |
| **166.39** | Horticulture New Zealand | Subdivision | SUB-P12 Subdivision Design Ensure that subdivision is designed and located to: maximis | Support | Supports in part to the extent that it recognises the need to minimise the potential for reverse sensitivity effects and/or conflict with existing and permitted activities on adjoining sites. | Add as follows to link to strategic direction:<br>Ensure that subdivision is designed and located to:<br>...<br>X. Protect highly productive land from loss, fragmentation or incompatible use | Reject |
| **193.13** | Ohau Company Trust (Shelton Downs Station) | Subdivision | SUB-P12 Subdivision Design Ensure that subdivision is designed and located to: maximis | Amend | Considers that SUB-P12 should be amended so that if sufficient public access is already provided, then Subdivision does not need to be designed to provide further Public access. Subdivision should also be an anticipated activity within ONLs. | Amend SUB-P12 'Subdivision Design' as follows:<br>Ensure that subdivision is designed and located to: | Reject |

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| | | | | | Amendment should provide the flexibility where practicable to achieve such outcomes as not all developments can achieve and attain all aspects in design and layout. | 1. maximise accessibility and connectivity with the surrounding community through walkways, cycleways and an interconnected transport network,unless sufficient access is already provided;and<br><br>2. reflect and respond to physical site characteristics, constraints and opportunities; and<br><br>3. minimise earthworks and land disturbance by designing building platforms that integrate into the natural landform; and<br><br>4. achieve hydraulic neutrality in urban zones; and<br><br>5. align streets and design open spaces to focus on significant views or landmarks; and<br><br>6. create allotment sizes and shapes that support a range of housing types and sizes and appropriate business activities; and<br><br>7. when within any scheduled wāhi tūpuna in SCHED5 - Sites and Areas of Significance to Māori for any greenfield subdivision, incorporate mātauraka Māori principles and provide opportunities to maintain or strengthen the relationship of takata whenua with their ancestral lands, water, sites, wāhi tapu, wāhi tūpuna and other taoka, where these have been identified through engagement with takata whenua and the subdivision has the potential to compromise takata whenua values and interests; and<br><br>~~7.~~8. When within any scheduled Outstanding Natural Landscapes SCHED8 ensure the subdivision does not significantly adversely affect the values of that Outstanding Natural Landscape<br><br>~~8.~~9.minimise future conflicts with roading and infrastructure, including as a result of the planting of new vegetation; and<br><br>~~9.~~10.maximise sunlight access, outlook and amenity, including opportunities for future buildings to maximise solar gain, reduce energy and water consumption, and use renewable energy; and<br><br>~~10.~~11.provide public open spaces that are within walkable distance (400-800m) from residential allotments; and<br><br>~~11.~~12.provide sufficient separation from zone boundaries and transport networks to minimise the potential for any reverse sensitivity effects and/or conflict with existing and permitted activities on adjoining sites.<br><br>~~12.~~13.be consistent with any relevant design guidelines which promote good planning, building design and urban design that give effect to the New Zealand Urban Design Protocol (2005); and<br><br>~~13.~~14.incorporate principles of Crime Prevention Through Environmental Design [CPTED] to achieve safe environments. | |
| **195.27** | New Zealand Pork Industry Board | Subdivision | SUB-P12 Subdivision Design Ensure that subdivision is designed and located to: maximis | Support | Support the policy | Retain as notified | Accept |
| **233.72** | KiwiRail Holdings Limited | Subdivision | SUB-P12 Subdivision Design Ensure that subdivision is designed and located to: maximis | Support | Supports a clear policy that ensures subdivision is designed to minimise reverse sensitivity and conflicts with existing or permitted activities, especially through sufficient separation from transport networks as outlined in clause (11). | Seeks to retain as notified. | Accept |
| **242.29** | Ministry of Education Te Tāhuhu o Te Mātauranga | Subdivision | SUB-P12 Subdivision Design Ensure that subdivision is designed and located to: maximis | Support | Supports policy SUB-P12 as it enables subdivision subject to a number of qualifiers, however the Ministry requests that specific provision for educational facilities is provided to ensure that population growth and the impact on schools is considered within developments.<br><br>Considers that the suggested amendment gives better effect to SUB-O2 in relation to providing for the health and wellbeing of communities including access to education. | Seeks to amend as follows:<br><br>Subdivision Design<br><br>Ensure that subdivision is designed and located to:<br><br>1. maximise accessibility and connectivity with the surrounding community through walkways, cycleways and an interconnected transport network; and<br><br>...<br><br>10. provide public open spaces that are within walkable distance (400-800m) from residential allotments; and | Reject |

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| | | | | | | 11. provide sufficient separation from zone boundaries and transport networks to minimise the potential for any reverse sensitivity effects and/or conflict with existing and permitted activities on adjoining sites.; and<br><br>12. be consistent with any relevant design guidelines which promote good planning, building design and urban design that give effect to the New Zealand Urban Design Protocol (2005); and<br><br>13. incorporate principles of Crime Prevention Through Environmental Design to achieve safe environments~~.~~; and<br><br>14. promotes accessibility to social infrastructure. | |
| **253.138** | Royal Forest and Bird Protection Society of New Zealand Incorporated | Subdivision | SUB-P12 Subdivision Design Ensure that subdivision is designed and located to: maximis | Oppose | Opposes in part:<br><br>Considers that subdivision design policy should include requirements around indigenous vegetation and restoring and enhancing indigenous biodiversity. | Seeks to insert additional requirements in SUB-P12 to ensure subdivision design:<br><br>a. Is integrated with the natural environment;<br><br>b. results in increasing indigenous vegetation cover particularly within the transport network, public open spaces and allotments;<br><br>c. restores and enhances indigenous biodiversity present on site. | Reject |
| **271.403** | Canterbury Regional Council | Subdivision | SUB-P12 Subdivision Design Ensure that subdivision is designed and located to: maximis | Support | Supports SUB-P12 'Subdivision design' as it gives effect to CRPS Objectives 5.2.1, 5.2.3 and Policy 5.3.1 concerning location, design and function of development; transport; and regional growth. | Retain SUB-P12 'Subdivision design' as notified. | Accept |
| **305.143** | Erin Nivonne Schultz | Subdivision | SUB-P12 Subdivision Design Ensure that subdivision is designed and located to: maximis | Support | Considers that good subdivision design principles are generally appropriate however, considers that rural subdivisions should not be required to meet the same access and open space expectations as urban developments as they are often undertaken to facilitate existing primary production activities. [refer to original submission for full reasons] | Seeks to amend as follows:<br><br>Ensure that subdivision is designed and located to:<br><br>1.~~maximise~~ takes into account where there may be opportunities for accessibility and connectivity with the surrounding community through walkways, cycleways and an interconnected transport network; and<br><br>...<br><br>7. when within any scheduled wāhi tūpuna in SCHED5 – Sites and Areas of Significance to Māori for any greenfield subdivision, incorporate mātauraka Māori principles and provide opportunities to maintain or strengthen the relationship of takata whenua with their ancestral lands, water, sites, wāhi tapu, wāhi tūpuna and other taoka, where these have been identified through engagement with takata whenua and the subdivision has the potential to compromise takata whenua values and interests, where appropriate; and<br><br>8. minimise future conflicts with roading and infrastructure, including as a result of the planting of new vegetation; and<br><br>9. maximise sunlight access, outlook and amenity, including opportunities for future buildings to maximise solar gain, reduce energy and water consumption, and use renewable energy, where appropriate; and<br><br>10. provide public open spaces that are within walkable distance (400-800m) from residential allotments, where appropriate; and<br><br>11. provide sufficient separation from zone boundaries and transport networks to minimise the potential for any reverse sensitivity effects and/or conflict with existing and permitted activities on adjoining sites.<br><br>12. be consistent with any relevant design guidelines which promote good planning, building design and urban design that give effect to the New Zealand Urban Design Protocol (2005), where appropriate; and<br><br>13. incorporate principles of Crime Prevention Through Environmental Design to achieve safe environments, where appropriate. | Reject |
| **306.143** | Waitaki Property Guardians Incorporated | Subdivision | SUB-P12 Subdivision Design Ensure that subdivision is designed and located to: maximis | Support | Considers that good subdivision design principles are generally appropriate however, considers that rural subdivisions should not be required to meet the same access and open space expectations as urban developments as they are often undertaken to facilitate existing primary production activities. [refer to original submission for full reasons] | Seeks to amend as follows:<br><br>Ensure that subdivision is designed and located to:<br><br>1.~~maximise~~ takes into account where there may be opportunities for accessibility and connectivity with the surrounding community through walkways, cycleways and an interconnected transport network; and | Reject |

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| | | | | | | ...<br><br>7. when within any scheduled wāhi tūpuna in SCHED5 – Sites and Areas of Significance to Māori for any greenfield subdivision, incorporate mātauraka Māori principles and provide opportunities to maintain or strengthen the relationship of takata whenua with their ancestral lands, water, sites, wāhi tapu, wāhi tūpuna and other taoka, where these have been identified through engagement with takata whenua and the subdivision has the potential to compromise takata whenua values and interests, where appropriate; and<br><br>8. minimise future conflicts with roading and infrastructure, including as a result of the planting of new vegetation; and<br><br>9. maximise sunlight access, outlook and amenity, including opportunities for future buildings to maximise solar gain, reduce energy and water consumption, and use renewable energy, where appropriate; and<br><br>10. provide public open spaces that are within walkable distance (400-800m) from residential allotments, where appropriate; and<br><br>11. provide sufficient separation from zone boundaries and transport networks to minimise the potential for any reverse sensitivity effects and/or conflict with existing and permitted activities on adjoining sites.<br><br>12. be consistent with any relevant design guidelines which promote good planning, building design and urban design that give effect to the New Zealand Urban Design Protocol (2005), where appropriate; and<br><br>13. incorporate principles of Crime Prevention Through Environmental Design to achieve safe environments, where appropriate. | |
| **183.45** | Beverley Anne Thomson | Subdivision | SUB-P12 Subdivision Design Ensure that subdivision is designed and located to: maximis | Oppose | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br><br>7. when within any scheduled wāhi tūpuna in SCHED5 – Sites and Areas of Significance to Māori (except in relation to any land which is privately owned or residentially or rurally zoned) for any greenfield subdivision,... | Reject |
| **270.43** | Vivien Ann Paton & Graeme John Paton | Subdivision | SUB-P12 Subdivision Design Ensure that subdivision is designed and located to: maximis | Amend | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br><br>7. when within any scheduled wāhi tūpuna in SCHED5 – Sites and Areas of Significance to Māori (except in relation to any land which is privately owned or residentially or rurally zoned)for any greenfield subdivision,... | Reject |
| **273.60** | Colin and Catherine Harvey | Subdivision | SUB-P12 Subdivision Design Ensure that subdivision is designed and located to: maximis | Oppose | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br><br>7. when within any scheduled wāhi tūpuna in SCHED5 – Sites and Areas of Significance to Māori (except in relation to any land which is privately owned or residentially or rurally zoned)for any greenfield subdivision,... | Reject |
| **274.60** | Garrie Alexander Farmer and Marilyn Anne Farmer | Subdivision | SUB-P12 Subdivision Design Ensure that subdivision is designed and located to: maximis | Oppose | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br><br>7. when within any scheduled wāhi tūpuna in SCHED5 – Sites and Areas of Significance to Māori (except in relation to any land which is privately owned or residentially or rurally zoned)for any greenfield subdivision,... | Reject |
| **275.46** | Mark & Nicky Hay | Subdivision | SUB-P12 Subdivision Design Ensure that subdivision is designed and located to: maximis | Amend | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br><br>7. when within any scheduled wāhi tūpuna in SCHED5 – Sites and Areas of Significance to Māori (except in relation to any land which is privately owned or residentially or rurally zoned)for any greenfield subdivision,... | Reject |
| **276.46** | Patrick Ronald Winders & Joan Patricia Winders | Subdivision | SUB-P12 Subdivision Design Ensure that subdivision is | Amend | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, | Seeks to amend as follows: | Reject |

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| | | | designed and located to: maximis | | rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | 7. when within any scheduled wāhi tūpuna in SCHED5 – Sites and Areas of Significance to Māori (except in relation to any land which is privately owned or residentially or rurally zoned)for any greenfield subdivision,... | |
| **277.46** | Anthony & Jennifer Jane Hales | Subdivision | SUB-P12 Subdivision Design Ensure that subdivision is designed and located to: maximis | Amend | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br>7. when within any scheduled wāhi tūpuna in SCHED5 – Sites and Areas of Significance to Māori (except in relation to any land which is privately owned or residentially or rurally zoned)for any greenfield subdivision,... | Reject |
| **278.46** | Colin Willetts & Catherine Anderson | Subdivision | SUB-P12 Subdivision Design Ensure that subdivision is designed and located to: maximis | Amend | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br>7. when within any scheduled wāhi tūpuna in SCHED5 – Sites and Areas of Significance to Māori (except in relation to any land which is privately owned or residentially or rurally zoned)for any greenfield subdivision,... | Reject |
| **279.60** | Paul Joseph Rutledge | Subdivision | SUB-P12 Subdivision Design Ensure that subdivision is designed and located to: maximis | Amend | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br>7. when within any scheduled wāhi tūpuna in SCHED5 – Sites and Areas of Significance to Māori (except in relation to any land which is privately owned or residentially or rurally zoned)for any greenfield subdivision,... | Reject |
| **307.44** | Allan Gordon King & Erina Margaret King | Subdivision | SUB-P12 Subdivision Design Ensure that subdivision is designed and located to: maximis | Amend | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br>7. when within any scheduled wāhi tūpuna in SCHED5 – Sites and Areas of Significance to Māori (except in relation to any land which is privately owned or residentially or rurally zoned)for any greenfield subdivision,... | Reject |
| **233.73** | KiwiRail Holdings Limited | Subdivision | SUB-P13 Subdivision in the Residential Zones Provide for subdivision in Residential Zon | Amend | Considers that an amendment is required to ensure reverse sensitivity is considered when assessing subdivision in Residential Zones, including appropriate setbacks from the rail corridor to manage the interface with sensitive land uses and supporting the intent of SUB-O4. | Seeks to amend as follows:<br>Provide for subdivision in Residential Zones, including infill subdivision, where the design, size and shape of allotments:<br>...<br>6. incorporates sufficient separation from transport networks to minimise the potential for any reverse sensitivity effects and/or conflict with existing and permitted activities on adjacent sites. | Reject |
| **271.404** | Canterbury Regional Council | Subdivision | SUB-P13 Subdivision in the Residential Zones Provide for subdivision in Residential Zon | Support | Supports SUB-P13 'Subdivision in the Residential Zones' as it gives effect to CRPS Objective 5.2.1 and Policy 5.3.1 with regards to location, design and function of development; and regional growth. | Retain SUB-P13 'Subdivision in the Residential Zones' as notified. | Accept |
| **271.405** | Canterbury Regional Council | Subdivision | SUB-P14 Subdivision in the Commercial Zones Provide for subdivision in Commercial Zones | Support | Generally, supports SUB-P14 'Subdivision in the Commercial Zones' and gives effect to CRPS Objective 5.2.1 and Policy 5.3.1. There is also Local Centre Zone in Ōmarama and Ōtematata. As such, Amendment is required for clarification purposes. | Amend SUB-P14 'Subdivision in the Commercial Zones' as follows:<br>Within Ōamaru, is consistent with the Ōamaru Town Centre Design Guidelines. | Accept |
| **152.51** | New Zealand Transport Agency Waka Kotahi | Subdivision | SUB-P16 Subdivision in the Rural Zones Provide for subdivision in the Rural Zones where | Support | Support the policy as drafted | Retain as notified | Accept |
| **166.40** | Horticulture New Zealand | Subdivision | SUB-P16 Subdivision in the Rural Zones Provide for subdivision in the Rural Zones where | Support | Supports in part to the extent that it recognises the need to manage reverse sensitivity effects and/or conflict with existing and permitted activities on adjoining sites and the requirement to protect the productivity of the land for primary production activities.<br>Considers the policy confusing in the outcomes sought. | Amend as follows:<br>...<br>7. incorporates sufficient separation from zone boundaries, ~~and~~ transport networks and primary production activities to minimise the potential for any reverse sensitivity effects and/or conflict with existing and permitted activities on adjoining sites;<br>... | Reject |

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| **172.3** | Bog Roy Station Limited | Subdivision | SUB-P16 Subdivision in the Rural Zones Provide for subdivision in the Rural Zones where | Support | Supports in part. Considers that the requirement to 'avoid' access points in prominent locations visible from public places is impractical, as all access points are inherently visible from roads and other public areas and this could unreasonably restrict development, potentially preventing accessways from being created in otherwise suitable and necessary locations | Amend SUB-P16(3) to read:<br>3.~~avoids~~ manages adverse effects of buildings ~~and access points~~ being located in prominent locations, as viewed from public places; | Reject |
| **176.12** | Terramark Limited | Subdivision | SUB-P16 Subdivision in the Rural Zones Provide for subdivision in the Rural Zones where | Support | Supports in part SUB-P16 'Subdivision in the Rural Zones' albeit an exception should be made for boundary adjustments versus the 20Ha minimum lot size as it allows for family or farm workers and farm succession planning. | Amend SUB-P16 'Subdivision in the Rural Zones' as follows:<br>8.protects the productivity of the land for primary production activities in the General Rural Zone by limiting fragmentation of land through avoiding new sites being created that are less than 20 hectares unless:<br>a. associated with a utility and any balance lot associated with the development of a utility; or<br>b. the subdivision occurs on a Māori Reserve; or<br>c. the subdivision is a boundary adjustment; or<br>d. the subdivision is for <1ha and >0.5ha and the residual parcel comprises at least 40ha, where a consent notice is applied to the residual requiring both sites to be included in minimum site size calculations for any future subdivision. | Reject |
| **193.14** | Ohau Company Trust (Shelton Downs Station) | Subdivision | SUB-P16 Subdivision in the Rural Zones Provide for subdivision in the Rural Zones where | Amend | Considers SUB-P16 'Subdivision in the Rural Zones' in order to be consistent with the NPS-UD entails amenity values need to develop and change over time. | Amend SUB-P16 as follows:<br>Provide for subdivision in the Rural Zones where the design, size and shape of allotments:<br>1. is consistent with and complement the role, function and anticipated scale, type and form of use and development for the relevant zone;<br>2. maintain prominent ridgelines, natural features and landforms, and areas of indigenous vegetation; where possible<br>3. avoids buildings and access points being located in prominent locations, as viewed from public places; or mitigates the visual effects of buildings and access points in prominent locations.<br>... | Reject |
| **195.28** | New Zealand Pork Industry Board | Subdivision | SUB-P16 Subdivision in the Rural Zones Provide for subdivision in the Rural Zones where | Amend | Support in part the policy to manage reverse sensitivity effects but seek the following amendments for clarity as productivity of the land for primary production activities in the GRUZ needs to be protected | Amend as follows:<br>7. incorporates sufficient separation from zone boundaries, ~~and~~ transport networks and primary production activities to minimise the potential for any reverse sensitivity effects and/or conflict with existing and permitted activities on adjoining sites; | Reject |
| **233.74** | KiwiRail Holdings Limited | Subdivision | SUB-P16 Subdivision in the Rural Zones Provide for subdivision in the Rural Zones where | Support | Supports the recognition of reverse sensitivity effects in relation to infrastructure that can be created with subdivision. | Seeks to retain as notified. | Accept |
| **246.211** | Federated Farmers of New Zealand Incorporated | Subdivision | SUB-P16 Subdivision in the Rural Zones Provide for subdivision in the Rural Zones where | Support | The submitters support in part. They support enabling rural subdivision and managing reverse-sensitivity effects. They consider subdivision to not affect ridgelines, landforms, or amenity; these relate to later land-use activities. Indigenous vegetation should not be a subdivision consideration, as the ECO chapter already manages it. Buildings or access points may need to be in prominent locations. They are concerned the policy could be used to impose unreasonable reverse-sensitivity limits on farming. They also raise rule-specific concerns Condition 8: The 20 ha minimum lot size should allow boundary adjustments, and they prefer an approach based on primary production values rather than a fixed size. Conditions 4 and 5: These duplicate SUB-P12 and should be removed. Scope: It is unclear whether “Rural Zones” includes the RLZ, leaving subdivision provisions for that zone uncertain. | The submitters seek amendment of SUB-P16 as follows:<br>Provide for subdivision in the Rural Zones where the design, size and shape of allotments:<br>1. is consistent with and complement the role, function and anticipated scale, type and form of use and development for the relevant zone;<br>2.~~maintain~~considersprominent ridgelines, natural features and landforms, ~~andareas of indigenous vegetation;~~<br>3.~~avoids buildings and access points being located in prominent locations, as viewed from public places;~~<br>4.~~incorporates physical site characteristics, constraints and opportunities into the design;~~<br>5.~~minimise earthworks and land disturbance by locating and designing building platforms to integrate into the natural landform;~~<br>6. maintain rural character and amenity; and | Reject |

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| | | | | | | 7. incorporates sufficient separation from zone boundaries, ~~and~~ transport networks and primary production activities to minimise the potential for any reverse sensitivity effects and/or conflict with existing and permitted activities on adjoining sites;<br><br>8. protects the productivity of the land for primary production activities in the General Rural Zone by limiting fragmentation of land through avoiding new sites being created that ~~are less than 20 hectares~~ would compromise primary production activities unless:<br><br>a. associated with a utility and any balance lot associated with the development of a utility; or<br><br>b. the subdivision occurs on a Māori Reserve; or<br><br>c. the subdivision is a boundary adjustment<br><br>Clarify if 'Rural Zone' includes the RLZ and Settlement Zone (as per the NPS) and consider merging SUB-P17 with SUB-P16 (or deleting SUB-P17 as it appears unnecessary). | |
| **266.5** | The Egg Producers Federation of New Zealand (EPFNZ) and the Poultry Industry Association of New Zealand (PIANZ) | Subdivision | SUB-P16 Subdivision in the Rural Zones Provide for subdivision in the Rural Zones where | Support | Considers that the intent of SUB-P16 to manage subdivision in the Rural Zones in a manner that protects rural character, maintains land productivity, and integrates development with natural features and landforms is supported. Alos supports the recognition of the need to manage reverse sensitivity effects in clause 7.<br><br>Seeks stronger wording in clause 7 to more effectively protect lawfully established primary production activities from incompatible subdivision and land use at the rural-urban interface, noting that primary production operations cannot readily relocate and are often constrained by climate, soils, infrastructure and biosecurity considerations. Fragmentation and encroachment from sensitive activities, such as rural lifestyle and residential development, can undermine the ongoing viability of productive land and generate tension that results in regulatory or operational restrictions. | Seeks to amend clause 7 to strengthen the direction around reverse sensitivity as required<br><br>• explicitly acknowledging the operational and locational constraints of primary production activities;<br><br>• ensuring that new allotments provide sufficient physical and functional separation from existing intensive farming activities; and<br><br>• requiring subdivision design to avoid locating sensitive activities in areas where reverse sensitivity effects are likely to arise.<br><br>Seeks to amend as follows:<br><br>7. incorporates sufficient separation from zone boundaries and transport networks to~~minimise~~avoid or mitigatethe potential for any reverse sensitivity effects and/or conflict with existing and permitted activities on adjoining sites,particularly lawfully established primary production activities which may be constrained in their ability to relocate or modify operations;<br><br>a. protects the productivity of the land for primary production activities in the General Rural Zone by limiting fragmentation of land through avoiding new sites being created that are less than 20 hectares unless:<br><br>b. associated with a utility and any balance lot associated with the development of a utility; or<br><br>c. the subdivision occurs on a Māori Reserve | Reject |
| **271.406** | Canterbury Regional Council | Subdivision | SUB-P16 Subdivision in the Rural Zones Provide for subdivision in the Rural Zones where | Support | Supports SUB-P16 'Subdivision in the Rural Zones' and gives effect to CRPS Objective 5.2.1 and Policy 5.3.1 concerning location, design and function of development; and regional growth. | Retain SUB-P16 'Subdivision in the Rural Zones' as notified. | Accept |
| **302.331** | Peter and Sandra Mitchell | Subdivision | SUB-P16 Subdivision in the Rural Zones Provide for subdivision in the Rural Zones where | Support | Supports proposed standard [refer to original submission] | [refer to original submission] | Accept |
| **76.9** | John Laurie (and others) | Subdivision | SUB-P16 Subdivision in the Rural Zones | Amend | Considers that Subdivision can be an offset for enhanced public access to ONL and ONF. | Amend SUB-P16 'Subdivision in the Rural Zones' to align with the relief sought as follows:<br><br>...<br><br>9. Enhances public access to outstanding natural features and landscapes, especially those deemed to be UNESCO Geopark sites. | Reject |
| **251.248** | Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki | Subdivision | SUB-P16 Subdivision in the Rural Zones Provide for subdivision in the Rural Zones where | Amend | Considers amendments required to ensure subdivision provisions correctly reference Māori land and Native Reserves for consistency across the plan. | Seeks to amend as follows:<br><br>b. the subdivision occurs on Māori land or a ~~Māori~~ Native Reserve | Reject |

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| **286.5** | S J B Munro Family Trust | Subdivision | SUB-P16 Subdivision in the Rural Zones Provide for subdivision in the Rural Zones where | Oppose | Considers that SUB-P16 clause 8 to be attempting to give effect to the National Policy Statement on Highly Productive Land but extends its scope by applying restrictions to any land in the General Rural Zone.<br><br>Considers that the clause will prohibits subdivision except those linked to a utility or Māori reserve, representing a highly restricted range of activities. | Seeks to consider that there should be greater scope for subdivision to occur in the General Rural Zone on land that is not highly productive land. | Reject |
| **305.144** | Erin Nivonne Schultz | Subdivision | SUB-P16 Subdivision in the Rural Zones Provide for subdivision in the Rural Zones where | Support | Support in part. Considers that subdivision in rural zones should support primary production values and protect identified landscape features and support for prioritising primary production values rather than relying on a fixed minimum lot size to achieve the rural zone intent. | Seeks to amend as follows:<br><br>...<br><br>2. maintain prominent ridgelines, natural features and landforms, and areas of indigenous vegetation within landscape overlays;<br><br>3. avoids buildings and access points being located in prominent locations, as viewed from public places within landscape overlays;<br><br>...<br><br>8. protects the productivity of the land for primary production activities in the General Rural Zone by limiting fragmentation of land through avoiding new sites being created that ~~are less than 20 hectares~~ would compromise primary production activities unless:<br><br>... | Reject |
| **306.144** | Waitaki Property Guardians Incorporated | Subdivision | SUB-P16 Subdivision in the Rural Zones Provide for subdivision in the Rural Zones where | Support | Support in part. Considers that subdivision in rural zones should support primary production values and protect identified landscape features and support for prioritising primary production values rather than relying on a fixed minimum lot size to achieve the rural zone intent. | Seeks to amend as follows:<br><br>...<br><br>2. maintain prominent ridgelines, natural features and landforms, and areas of indigenous vegetation within landscape overlays;<br><br>3. avoids buildings and access points being located in prominent locations, as viewed from public places within landscape overlays;<br><br>...<br><br>8. protects the productivity of the land for primary production activities in the General Rural Zone by limiting fragmentation of land through avoiding new sites being created that ~~are less than 20 hectares~~ would compromise primary production activities unless:<br><br>... | Reject |
| **311.6** | Helen Jansen | Subdivision | SUB-P16 Subdivision in the Rural Zones Provide for subdivision in the Rural Zones where | Amend | Considers subdivision can be an offset for enhanced public access to ONL and ONF | Seeks to amend as follows:<br><br>(9) Enhances public access to outstanding natural features and landscapes, especially those deemed to be UNESCO Geopark sites | Reject |
| **246.212** | Federated Farmers of New Zealand Incorporated | Subdivision | SUB-P17 Subdivision in the Settlement Zones Provide for subdivision in the Settlement Zone | Oppose | Oppose<br><br>The NPS indicates the 'Rural Zones' include GRUZ, RLZ and the Settlement Zone (Section 4, Table 4). As SUB-16 addresses the Rural Zone, SUB-17 is unnecessary and should be deleted. Clause 2 could be incorporated in SUB-16 if necessary. | The submitters seek deletion of SUB-P17. | Accept |
| **165.92** | Bryry Trust | Subdivision | SUB-P2 Boundary adjustments and updates to existing cross-leases Enable boundary adjustmen | Support | No specific reason given. | Retain SUB-P2 'Enable boundary adjustments and updates to existing cross-leases' as notified. | Accept |
| **252.59** | Hollamby Family Trust | Subdivision | SUB-P2 Boundary adjustments and updates to existing cross-leases Enable boundary adjustmen | Support | No specific reason given. | Retain | Accept |
| **258.30** | Bryce Burnett | Subdivision | SUB-P2 Boundary adjustments and updates to existing cross-leases Enable boundary adjustmen | Support | No specific reason given. | Retain | Accept |

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| **268.66** | Ryan and Hayley Ambler | Subdivision | SUB-P2 Boundary adjustments and updates to existing cross-leases Enable boundary adjustmen | Support | No specific reason given. | Retain | Accept |
| **271.393** | Canterbury Regional Council | Subdivision | SUB-P2 Boundary adjustments and updates to existing cross-leases Enable boundary adjustmen | Support | Supports SUB-P2 'Boundary adjustments and updates to existing cross-leases' as they can achieve a more efficient and effective use of land.<br>[Inferred as specific reasons not given] | Retain SUB-P2 as notified. | Accept |
| **287.113** | P K M Farms Limited | Subdivision | SUB-P2 Boundary adjustments and updates to existing cross-leases Enable boundary adjustmen | Support | No specific reason given. | Seeks to retain as notified. | Accept |
| **305.141** | Erin Nivonne Schultz | Subdivision | SUB-P2 Boundary adjustments and updates to existing cross-leases Enable boundary adjustmen | Support | Supports a straightforward subdivision process for boundary adjustment, especially as these can be common to support primary production activities. | Seeks to retain as notified. | Accept |
| **306.141** | Waitaki Property Guardians Incorporated | Subdivision | SUB-P2 Boundary adjustments and updates to existing cross-leases Enable boundary adjustmen | Support | Supports a straightforward subdivision process for boundary adjustment, especially as these can be common to support primary production activities. | Seeks to retain as notified. | Accept |
| **51.41** | James White | Subdivision | SUB-P3 Provision of infrastructure | Oppose | Opposes the provision of infrastructure to be installed at the time of subdivision for Business and Industrial zoned land owned by the Submitter in Ōamaru and Otematata. | Seeks the deletion of requiring infrastructure to be installed at the time of subdivision as follows:<br>SUB-P3 Provision of Infrastructure<br>~~3. requiring infrastructure to be installed at the time of subdivision; and~~<br>With the following amendment:<br>3. requiring infrastructural capacity assessment demonstrating that services can be provided efficiently and affordably in the future.<br>[Refer to original submission for full reasons. Inferred relief sought] | Reject |
| **163.46** | Fire and Emergency New Zealand | Subdivision | SUB-P3 Provision of infrastructure Require infrastructure to be provided in an integrated | Support | Supports subdivision to be serviced in an integrated and comprehensive manner and that appropriate water supply infrastructure with sufficient capacity for firefighting shall be provided. | Retain as notified. | Accept in part |
| **164.5** | NPHS Te Waipounamu | Subdivision | SUB-P3 Provision of infrastructure Require infrastructure to be provided in an integrated | Support | Supports (4.) and (5.) as access to safe drinking water and the safe collection, treatment, and disposal of sewage and wastewater is vital for public health, especially in un-serviced communities. Sewage can carry numerous harmful pathogens and toxic chemicals, posing serious health threats if it contaminates the environment. If drinking and recreational water is contaminated it similarly poses a serious risk to human health.<br>[See original submission for full reasons] | Retain as notified. | Accept in part |
| **233.69** | KiwiRail Holdings Limited | Subdivision | SUB-P3 Provision of infrastructure Require infrastructure to be provided in an integrated | Support | Supports a policy requiring new allotments to manage stormwater on-site and within the public network, as uncontrolled discharge onto the rail corridor can damage infrastructure and disrupt safe rail operations. | Seeks to retain as notified. | Accept in part |
| **242.28** | Ministry of Education Te Tāhuhu o Te Mātauranga | Subdivision | SUB-P3 Provision of infrastructure Require infrastructure to be provided in an integrated | Support | Support SUB-P3 in principle as it seeks to ensure that subdivisions are appropriately serviced and integrated with infrastructure, however the Ministry requests that specific provision for educational facilities is provided.<br>Considers that it is important for subdivisions to be designed to accommodate social infrastructure, if deemed necessary by a needs assessment, to ensure population growth and the impact on schools is considered. | Seeks to amend as follows:<br>Provision of infrastructure<br>Require infrastructure to be provided in an integrated and comprehensive manner by:<br>1. ensuring that the subdivision will be appropriately serviced and integrated with existing and planned infrastructure,including social infrastructure;and<br>... | Accept in part |

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| **244.88** | Telecommunication Companies | Subdivision | SUB-P3 Provision of infrastructure Require infrastructure to be provided in an integrated | Support | Considers that the need to integrate the provision of infrastructure to all new allotments at the time of subdivision is supported by the companies, however, not all infrastructure is governed by WDC standards.<br><br>Seeks amendment to recognise as above in subpoint 2. | Seeks to amend as follows:<br><br>Require infrastructure to be provided in an integrated and comprehensive manner by: ...<br><br>2. ensuring that infrastructure meetsany relevantWDC standardsor any infrastructure company standards if the infrastructure in question is not provided by WDC,and has sufficient capacity to accommodate the development or anticipated future development; and | Reject |
| **246.208** | Federated Farmers of New Zealand Incorporated | Subdivision | SUB-P3 Provision of infrastructure Require infrastructure to be provided in an integrated | Support | The submitters support in part. They agree new sites must be appropriately serviced but emphasise that rural properties are typically fully self-serviced for water, wastewater, stormwater, telecommunications, and sometimes power. Private infrastructure is designed later under the Building Act, often long after subdivision, and future owners—not subdividers—determine building locations and onsite systems. They consider it inappropriate and unnecessary to require onsite infrastructure design or installation at subdivision stage. They also note that wastewater and stormwater discharges are regional-council matters, which should be reflected in condition 5. | The submitters seek amendment of SUB-P3 as follows:<br><br>Require infrastructure to be provided in an integrated and comprehensive manner by:<br><br>1. ensuring that the subdivision will be appropriately serviced and integrated with existing and planned infrastructure; and<br><br>2. ensuring that infrastructure meets WDC standards and has sufficient capacity to accommodate the development or anticipated future development; and<br><br>3.In the urban environment, requiring infrastructure to be installed at the time of subdivision; and<br><br>4. requiring connections to reticulated systems, where reticulation services are available for the allotment, or are within close proximity to the site; and<br><br>5. ensuring that appropriate on-site wastewater, stormwater and water supply infrastructure, which avoids or mitigates adverse effects on the environment and human health and with sufficient capacity for firefighting purposes, ~~is~~ are able to be provided on-site where reticulated services are not available ~~for the site~~; and<br><br>6. ensuring telecommunications and power supply is provided to all urban allotments.<br><br>Or provide alternative relief that excludes rural and other properties intended to be self-serviced from the requirement to install infrastructure at the time of the proposed subdivision. | Reject |
| **271.394** | Canterbury Regional Council | Subdivision | SUB-P3 Provision of infrastructure Require infrastructure to be provided in an integrated | Support | Supports SUB-P3 'Provision of infrastructure' as giving effect to CRPS Objective 5.2.1 and Policies 5.3.2, 5.3.5 and 5.3.10 that concern location, design and function of development; development conditions; servicing and telecommunication infrastructure. | Retain SUB-P3 'Provision of infrastructure' as notified. | Accept in part |
| **288.67** | Network Waitaki Limited | Subdivision | SUB-P3 Provision of infrastructure Require infrastructure to be provided in an integrated | Support | Supports this policy as it provides recognition of the provision of infrastructure for subdivisions. Seeks a minor amendment to align with the term 'electricity connections' used in SUB-S9. | Seeks to amend as follows:<br><br>Ensuring telecommunications andelectricity connections~~power supply is~~areprovided to all allotments. | Reject |
| **305.142** | Erin Nivonne Schultz | Subdivision | SUB-P3 Provision of infrastructure Require infrastructure to be provided in an integrated | Support | Considers that infrastructure provision is important but may not always be appropriate at the time of subdivision in rural areas. Considers that infrastructure requirements should be flexible to reflect uncertainty or delayed development. [refer to original submission for full reasons] | Seeks to amend as follows:<br><br>...<br><br>3. requiring infrastructure to be installed at the time of subdivision, where appropriate; and<br><br>4. requiring connections to reticulated systems, where reticulation services are available for the allotment, or are within close proximity to the site, where appropriate; and<br><br>5. ensuring that appropriate on-site wastewater, stormwater and water supply infrastructure, which avoids or mitigates adverse effects on the environment and human health and with sufficient capacity for firefighting purposes,~~is~~ can be provided on-site where reticulated services are not available for the site; and<br><br>6. ensuring ~~telecommunications and~~ power supply is provided to all allotments, where appropriate. | Reject |
| **306.142** | Waitaki Property Guardians Incorporated | Subdivision | SUB-P3 Provision of infrastructure Require infrastructure to be provided in an integrated | Support | Considers that infrastructure provision is important but may not always be appropriate at the time of subdivision in rural areas. Considers that infrastructure requirements should be flexible to reflect uncertainty or delayed development. [refer to original submission for full reasons] | Seeks to amend as follows:<br><br>...<br><br>3. requiring infrastructure to be installed at the time of subdivision, where appropriate; and | Reject |

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| | | | | | | 4. requiring connections to reticulated systems, where reticulation services are available for the allotment, or are within close proximity to the site, where appropriate; and<br><br>5. ensuring that appropriate on-site wastewater, stormwater and water supply infrastructure, which avoids or mitigates adverse effects on the environment and human health and with sufficient capacity for firefighting purposes, ~~is~~ can be provided on-site where reticulated services are not available for the site; and<br><br>6. ensuring ~~telecommunications and~~ power supply is provided to all allotments, where appropriate. | |
| **152.50** | New Zealand Transport Agency Waka Kotahi | Subdivision | SUB-P4 Transport network Ensure that subdivision does not compromise the safe and efficien | Support | Supports the policy as drafted | Retain as notified | Accept |
| **152.54** | New Zealand Transport Agency Waka Kotahi | Subdivision | SUB-P4 Transport network Ensure that subdivision does not compromise the safe and efficien | Support | Support the policy as drafted | Retain as notified | Accept |
| **163.47** | Fire and Emergency New Zealand | Subdivision | SUB-P4 Transport network Ensure that subdivision does not compromise the safe and efficien | Support | Supports roads, access lots, and rights of way to meet minimum design standards. | Retain as notified. | Accept |
| **233.70** | KiwiRail Holdings Limited | Subdivision | SUB-P4 Transport network Ensure that subdivision does not compromise the safe and efficien | Support | Supports a policy requiring compliance with minimum design standards such as vehicle crossing setbacks and sightlines as these are vital for safety at rail level crossings. | Seeks to retain as notified. | Accept |
| **243.95** | Whitestone Contracting Limited | Subdivision | SUB-P4 Transport network Ensure that subdivision does not compromise the safe and efficien | Oppose | Opposes proposed SUB-P4. Considers that the safe and efficient functioning of the transport network is critical to the ongoing prosperity of the district. The policy should recognise the need for sufficient capacity to maintain and operate the transport network effectively. | Seeks to amend policy to include:<br><br>6. Ensuring that the additional load on the transport network can be effectively maintained and operated. | Reject |
| **271.395** | Canterbury Regional Council | Subdivision | SUB-P4 Transport network Ensure that subdivision does not compromise the safe and efficien | Support | Supports SUB-P4 'Transport network' as it gives effect to CRPS Objective 5.2.3 and Policies 5.3.7, 5.3.8 relating to a safe, efficient and effective transport system; strategic land transport network and arterial roads; and land use and transport integration. | Retain SUB-P4 'Transport network' as notified. | Accept |
| **244.89** | Telecommunication Companies | Subdivision | SUB-P5 Subdivision for network utilities Control the creation of allotments for the pur | Support | Considers that the policy recognises the importance of providing for the subdivision of allotments for infrastructure, which is appropriate that the standards for infrastructure allotments are bespoke. | Retain as notified. | Accept |
| **271.396** | Canterbury Regional Council | Subdivision | SUB-P5 Subdivision for network utilities Control the creation of allotments for the pur | Support | Generally, supports SUB-P5 'Subdivision for network utilities' regarding allotments for the purposes of a network utility in order to ensure that the lot is of a sufficient size to accommodate its required use.<br><br>[Inferred as specific reasons not given] | Retain SUB-P5 'Subdivision for network utilities' as notified. | Accept |
| **288.68** | Network Waitaki Limited | Subdivision | SUB-P5 Subdivision for network utilities Control the creation of allotments for the pur | Support | Supports this policy no specific reason given. | Retain as notified. | Accept |
| **152.55** | New Zealand Transport Agency Waka Kotahi | Subdivision | SUB-P6 Effects of subdivision on infrastructure Require subdivisions to be designed to min | Support | Support the policy as drafted | Retain as notified | Accept |
| **233.71** | KiwiRail Holdings Limited | Subdivision | SUB-P6 Effects of subdivision on infrastructure Require | Support | Supports a policy that requires subdivision design to minimise adverse effects on the safe and efficient operations, maintenance of, and access to 'Regionally significant infrastructure'. | Seeks to retain as notified. | Accept |

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| | | | subdivisions to be designed to min | | | | |
| **244.90** | Telecommunication Companies | Subdivision | SUB-P6 Effects of subdivision on infrastructure Require subdivisions to be designed to min | Support | Considers that the policy recognises that subdivisions should be designed to minimise any adverse effects on existing regionally significant infrastructure including wireless and fix line telecommunication networks. Noting the definition of regionally significant infrastructure is sought to be deleted, the provision should be amended accordingly. | Seeks to amend as follows:<br>Require subdivisions to be designed to minimise any adverse effects, including reverse sensitivity effects on the safe and efficient operation, maintenance of, and access to~~Regionally Significant~~Infrastructure. | Reject |
| **252.60** | Hollamby Family Trust | Subdivision | SUB-P6 Effects of subdivision on infrastructure Require subdivisions to be designed to min | Support | No specific reason given. | Retain | Accept |
| **259.77** | Otago Regional Council | Subdivision | SUB-P6 Effects of subdivision on infrastructure Require subdivisions to be designed to min | Support | Considers that requiring assessment of effects on regionally significant infrastructure is necessary and will support appropriate management of subdivision impacts on flood protection. | Seeks to retain as notified. | Accept |
| **271.397** | Canterbury Regional Council | Subdivision | SUB-P6 Effects of subdivision on infrastructure Require subdivisions to be designed to min | Support | Supports SUB-P6 'Effects of subdivision on infrastructure' as it gives effect to CRPS Objective 5.2.2 and Policies 5.3.2 and 5.3.9 concerning the integration of infrastructure; development conditions; and regionally significant infrastructure. | Retain SUB-P6 as notified. | Accept |
| **287.114** | P K M Farms Limited | Subdivision | SUB-P6 Effects of subdivision on infrastructure Require subdivisions to be designed to min | Support | No specific reason given. | Seeks to retain as notified. | Accept |
| **288.69** | Network Waitaki Limited | Subdivision | SUB-P6 Effects of subdivision on infrastructure Require subdivisions to be designed to min | Support | Supports this policy no specific reason given. | Retain as notified. | Accept |
| **294.82** | Meridian Energy Limited | Subdivision | SUB-P6 Effects of subdivision on infrastructure Require subdivisions to be designed to min | Oppose | Considers that minimising the effects of subdivision on the Waitaki Power Scheme does not go far enough to be consistent with the NPS-REG and that such effects should be avoided. | Seeks to amend as follows:<br>Require subdivisions to be designed to minimise any adverse effects, including reverse sensitivity effects on the safe and efficient operation, maintenance of, and access to Regionally Significant Infrastructure, and to avoid adverse effects on the Waitaki Power Scheme | Reject |
| **309.103** | Transpower New Zealand Limited | Subdivision | SUB-P6 Effects of subdivision on infrastructure Require subdivisions to be designed to min | Support | Supports the policy for effects of subdivision on infrastructure, aligning with NPSET and regional policies. | Seeks to retain as notified. | Accept |
| **271.398** | Canterbury Regional Council | Subdivision | SUB-P7 Subdivision and the National Grid Avoid locating building platforms within the N | Support | Supports SUB-P7 'Subdivision and the National Grid' as it gives effect to CRPS Objective 5.2.2 and Policies 5.3.2 and 5.3.9 concerning the integration of infrastructure; development conditions; and regionally significant infrastructure. | Retain SUB-P7 'Subdivision and the National Grid' as notified. | Accept in part |
| **309.104** | Transpower New Zealand Limited | Subdivision | SUB-P7 Subdivision and the National Grid Avoid locating building platforms within the N | Support | Supports the intent of the policy for subdivision and the National Grid but requests amendments to better align with NPSET. | Seeks to amend as follows:<br>Avoid locating building platforms within the National Grid Yard and only allow for subdivision within the National Grid Subdivision Corridor where it can be demonstrated that any reverse sensitivity effects will be avoided, and any other adverse effects on and from the National Grid, including public health and safety, will be avoided, remedied or mitigated, taking into account:<br>1. the impact of subdivision layout and design on the operation, maintenance, upgrade and development of the National Grid, including continued and reasonable access to transmission assets;<br>... | Accept in part |

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| | | | | | | 7. the nature and location of any proposed vegetation to be planted within the National Grid Yard; and<br><br>8. the outcome of any consultation with, and technical advice from, Transpower. | |
| **271.399** | Canterbury Regional Council | Subdivision | SUB-P8 Subdivision in Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas Only a | Support | Supports SUB-P8 'Subdivision in Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas' as it gives effect to CRPS Objective 5.2.2 and Policies 5.3.2 and 5.3.9 concerning the integration of infrastructure; development conditions; and regionally significant infrastructure. | Retain SUB-P8 'Subdivision in Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas' as notified. | Accept in part |
| **294.83** | Meridian Energy Limited | Subdivision | SUB-P8 Subdivision in Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas Only a | Oppose | General support for the policy but considers that to be consistent with the NPS-REG clause (2) should clearly address managing the potential for reverse sensitivity effects that would compromise the ongoing operation, maintenance or upgrade of the Waitaki Power Scheme, and clause (3) should be amended to more clearly prevent subdivision leading to an increased risk to people or property from hydroelectricity inundation | Seeks to amend as follows:<br><br>…<br><br>2. the subdivision will not increase the potential for reverse sensitivity effects that would compromise the ongoing operation, maintenance, or upgrade of the Waitaki Power Scheme; and<br><br>3. the subdivision will not increase the likelihood or scale of harm to people or property from hydroelectricity inundation ~~any risk to lives and well-being from an uncontrolled release of water from the Waitaki Power Scheme is acceptable.~~ | Accept in part |
| **165.93** | Bryry Trust | Subdivision | SUB-P9 Esplanade reserves and esplanade strips Require the creation of esplanade reserv | Support | Considers that SUB-P9 'Esplanade reserves and esplanade strips' should only be required where there is public good, practicability, WDC management for the public and the King's Chain already provides access along waterways and the coastline so that it aggregates access. Esplanade reserves / strips could be waived where public access will not be safe due to the adjoining land use or other factors like dangerous terrain, or where the subdivision is a boundary adjustment. | Amend SUB-P9 'Esplanade reserves and esplanade strips' as follows:<br><br>Encourage where appropriate ~~Require~~ the creation of esplanade reserves or esplanade strips when subdividing land adjoining the coast and other qualifying waterbodies over 3m in width for public access and esplanade strips, except where the subdivision is for a boundary adjustment or is for a network utility. | Reject |
| **193.12** | Ohau Company Trust (Shelton Downs Station) | Subdivision | SUB-P9 Esplanade reserves and esplanade strips Require the creation of esplanade reserv | Amend | Considers that SUB-P9 'Esplanade reserves and esplanade strips' should not have to provide PA where there are already linkages. | Amend SUB-P9 as follows:<br><br>Require the creation of esplanade reserves or esplanade strips when subdividing land adjoining the coast and other qualifying waterbodies over 3m in width for public access and esplanade strips, except where the subdivision is for a boundary adjustment or is for a network utility, or where public access already exists. | Reject |
| **246.209** | Federated Farmers of New Zealand Incorporated | Subdivision | SUB-P9 Esplanade reserves and esplanade strips Require the creation of esplanade reserv | Support | Support in part:<br><br>The submitters request clarification that esplanade reserves and strips are only a requirement for subdivisions less than 4 ha, in accordance with SUB-S10. | The submitters seek amendment of SUB-P9 as follows:<br><br>Require the creation of esplanade reserves or esplanade strips when subdividing land adjoining the coast and other qualifying waterbodies over 3m in width for public access and esplanade strips, where the subdivision creates an allotment of less than 4ha, except where the subdivision is for a boundary adjustment or is for a network utility. | Reject |
| **252.61** | Hollamby Family Trust | Subdivision | SUB-P9 Esplanade reserves and esplanade strips Require the creation of esplanade reserv | Support | Considers that SUB-P9 'Esplanade reserves and esplanade strips' should only be required where there is public good, practicability, WDC management for the public and the King's Chain already provides access along waterways and the coastline so that it aggregates access. Esplanade reserves / strips could be waived where public access will not be safe due to the adjoining land use or other factors like dangerous terrain, or where the subdivision is a boundary adjustment. | Seeks to amend as follows:<br><br>Encourage where appropriate~~Require~~the creation of esplanade reserves or esplanade strips when subdividing land adjoining the coast and other qualifying waterbodies over 3m in width for public access and esplanade strips, except where the subdivision is for a boundary adjustment or is for a network utility. | Reject |
| **255.21** | Bill and Angela Johnston | Subdivision | SUB-P9 Esplanade reserves and esplanade strips Require the creation of esplanade reserv | Support | Considers that SUB-P9 'Esplanade reserves and esplanade strips' should only be required where there is public good, practicability, WDC management for the public and the King's Chain already provides access along waterways and the coastline so that it aggregates access. Esplanade reserves / strips could be waived where public access will not be safe due to the adjoining land use or other factors like dangerous terrrain, or where the subdivision is a boundary adjustment. | Seek to amend SUB-P9 'Esplanade reserves and esplanade strips' as follows:<br><br>Encourage where appropriate~~Require~~ the creation of esplanade reserves or esplanade strips when subdividing land adjoining the coast and other qualifying waterbodies over 3m in width for public access and esplanade strips, except where the subdivision is for a boundary adjustment or is for a network utility. | Reject |
| **258.31** | Bryce Burnett | Subdivision | SUB-P9 Esplanade reserves and esplanade strips Require the creation of esplanade reserv | Support | Considers that SUB-P9 'Esplanade reserves and esplanade strips' should only be required where there is public good, practicability, WDC management for the public and the King's Chain already provides access along waterways and the coastline so that it aggregates access. Esplanade reserves / strips could be waived where public access will not be safe due to the adjoining land use or other factors like dangerous terrain, or where the subdivision is a boundary adjustment. | Seeks to amend as follows:<br><br>Encourage where appropriate~~Require~~the creation of esplanade reserves or esplanade strips when subdividing land adjoining the coast and other qualifying waterbodies over 3m in width for public access and esplanade strips, except where the subdivision is for a boundary adjustment or is for a network utility. | Reject |
| **268.67** | Ryan and Hayley Ambler | Subdivision | SUB-P9 Esplanade reserves and esplanade strips Require | Support | Considers that SUB-P9 'Esplanade reserves and esplanade strips' should only be required where there is public good, practicability, WDC management for the public and the King's Chain already provides access along waterways and the coastline so that it aggregates access. Esplanade reserves / strips could be waived where public | Seeks to amend as follows:<br><br>Encourage where appropriate~~Require~~the creation of esplanade reserves or esplanade strips when subdividing land adjoining the coast and other qualifying waterbodies over | Reject |

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| | | | the creation of esplanade reserv | | access will not be safe due to the adjoining land use or other factors like dangerous terrain, or where the subdivision is a boundary adjustment. | 3m in width for public access and esplanade strips, except where the subdivision is for a boundary adjustment or is for a network utility. | |
| **271.400** | Canterbury Regional Council | Subdivision | SUB-P9 Esplanade reserves and esplanade strips Require the creation of esplanade reserv | Support | Supports SUB-P9 'Esplanade reserves and esplanade strips' as it gives effect to CRPS Objective 10.2.4 and Policy 10.3.5 that concern public and Ngāi Tahu access along rivers, beds and lakes. | Retain SUB-P9 'Esplanade reserves and esplanade strips' as notified. | Reject |
| **287.115** | P K M Farms Limited | Subdivision | SUB-P9 Esplanade reserves and esplanade strips Require the creation of esplanade reserv | Support | Support in part, but only if esplanade strips or reserves provide community benefits, are practical, and their maintenance costs are managed by the council and reflect their public value. The submitter also notes that the Queens Chain already allows access along major waterways and the coast. | Seeks to amend as follows:<br>Encourage where appropriate the creation of ~~Require the creation of~~ esplanade reserves or esplanade strips when subdividing land adjoining the coast and other qualifying waterbodies over 3m in width for public access and esplanade strips, except where the subdivision is for a boundary adjustment or is for a network utility. | Reject |
| **163.49** | Fire and Emergency New Zealand | Subdivision | SUB-R1 Boundary adjustment All zones Activity status: Controlled Where: CON-1 The b | Support | Support as notified to the extent that it is subject to SUB-S5 and SUB-S6 and the matters of discretion include 'the provision of infrastructure and services for drinking water and firefighting supply'. | Retain as notified. | Accept |
| **176.13** | Terramark Limited | Subdivision | SUB-R1 Boundary adjustment All zones Activity status: Controlled Where: CON-1 The b | Support | Supports in part SUB-R1 'Boundary adjustment' as an exception should be made for boundary adjustments versus the 20Ha minimum lot size as it allows for family or farm workers and farm succession planning. | Amend SUB-R1 'Boundary adjustment' as follows:<br>8.protects the productivity of the land for primary production activities in the General Rural Zone by limiting fragmentation of land through avoiding new sites being created that are less than 20 hectares unless:<br>a. associated with a utility and any balance lot associated with the development of a utility; or<br>b. the subdivision occurs on a Māori Reserve; or<br>c. the subdivision is a boundary adjustment; or<br>d. the subdivision is for <1ha and >0.5ha and the residual parcel comprises at least 40ha, where a consent notice is applied to the residual requiring both sites to be included in minimum site size calculations for any future subdivision. | Reject |
| **246.213** | Federated Farmers of New Zealand Incorporated | Subdivision | SUB-R1 Boundary adjustment All zones Activity status: Controlled Where: CON-1 The b | Support | The submitters support in part. They support boundary adjustments being a controlled activity, as this allows efficient reallocation of farmland without creating new lots or increasing effects on infrastructure or services. They oppose applying CON-2 and CON-3(1) in the GRUZ, given the large minimum lot sizes, and they support a restricted discretionary pathway for adjustments that do not meet CON-1, CON-2, or CON-3. | The submitters seek amendment of SUB-R1 as follows:<br>Activity status: Controlled<br>Where:<br>CON-1<br>The boundary adjustment does not alter:<br>1. the permitted activity status of any existing permitted activities occurring on the allotments; and/or<br>2. the degree of any non-compliance with any lawfully established existing activity on the allotments; and<br>CON-2<br>Excluding in the GRUZ, the boundary adjustment will not result in a reduction in size of the new allotments below the minimum lot size for the relevant zone as required under SUB-S1 Minimum allotment sizes and dimensions; and<br>CON-3<br>All of the following standards are complied with where relevant:<br>1. SUB-S1 Minimum allotment sizes and dimensions(excluding in the GRUZ)<br>2. SUB-S5 Access<br>3. SUB-S6 Water supply<br>4. SUB-S7 Wastewater disposal<br>5. SUB-S8 Stormwater management<br>6. SUB-S9 Electricity and telecommunications | Reject |

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| | | | | | | 7. SUB-S10 Esplanade reserves and esplanade strips. | |
| **271.407** | Canterbury Regional Council | Subdivision | SUB-R1 Boundary adjustment All zones Activity status: Controlled Where: CON-1 The b | Support | Generally, supports SUB-R1 'Boundary adjustment' as neutral.<br>[Inferred submission summary] | Retain SUB-R1 'Boundary adjustment' as notified. | Accept |
| **305.145** | Erin Nivonne Schultz | Subdivision | SUB-R1 Boundary adjustment All zones Activity status: Controlled Where: CON-1 The b | Support | Supports a controlled activity status for boundary adjustments which do not result in additional allotments being created. | Seeks to retain as notified. | Accept |
| **306.145** | Waitaki Property Guardians Incorporated | Subdivision | SUB-R1 Boundary adjustment All zones Activity status: Controlled Where: CON-1 The b | Support | Supports a controlled activity status for boundary adjustments which do not result in additional allotments being created. | Seeks to retain as notified. | Accept |
| **251.253** | Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki | Subdivision | SUB-R12 Subdivision in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas | Oppose | Considers that the subdivision rules are too onerous for Kāi Tahu land set aside for settlement purposes. The submitter considers that a more enabling approach is required to align with PORPS provisions and support papakāika development. [refer to original submission for full reasons] | Seeks amendments to provide a more enabling status for subdivision by Kāi Tahu on Māori land and Native Reserves.<br>Seeks to make any other amendments to rules and standards as necessary to enable subdivision of Māori land and Native Reserves by Kāi Tahu. | Reject |
| **271.418** | Canterbury Regional Council | Subdivision | SUB-R12 Subdivision in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas | Support | Neutral, taken as generally support SUB-R12 'Subdivision in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas'.<br>[Inferred relief requested] | Retain SUB-R12 'Subdivision in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas' as publicly notified. | Accept |
| **294.84** | Meridian Energy Limited | Subdivision | SUB-R12 Subdivision in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas | Support | Support for the rule and considers that along with SUB-P8, as amended by submission point 294.83 , appropriate protection can be provided to the nationally significant Waitaki Power Scheme, while at the same time protecting people and property. | Retain as notified | Accept |
| **251.256** | Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki | Subdivision | SUB-R15 Subdivision of a site located fully or partially in the Moeraki Land Instability Overl | Oppose | Considers that the subdivision rules are too onerous for Kāi Tahu land set aside for settlement purposes. The submitter considers that a more enabling approach is required to align with PORPS provisions and support papakāika development. [refer to original submission for full reasons] | Seeks amendments to provide a more enabling status for subdivision by Kāi Tahu on Māori land and Native Reserves.<br>Seeks to make any other amendments to rules and standards as necessary to enable subdivision of Māori land and Native Reserves by Kāi Tahu. | Reject |
| **305.152** | Erin Nivonne Schultz | Subdivision | SUB-R15 Subdivision of a site located fully or partially in the Moeraki Land Instability Overl | Support | Supports a discretionary activity status for subdivisions, other than boundary adjustments. | Seeks to retain as notified. | Accept |
| **306.152** | Waitaki Property Guardians Incorporated | Subdivision | SUB-R15 Subdivision of a site located fully or partially in the Moeraki Land Instability Overl | Support | Supports a discretionary activity status for subdivisions, other than boundary adjustments. | Seeks to retain as notified. | Accept |
| **271.420** | Canterbury Regional Council | Subdivision | SUB-R16 Subdivision of a site located fully or partially in the Surface Fault Rupture Hazard A | Amend | CRC seeks rewording SUB-R16 'Subdivision of a site located fully or partially in the Surface Fault Rupture Hazard Awareness Overlay – Subdivision' slightly to remove 'fault avoidance zone' and increase the setback to be consistent with how we have mapped the Ostler Fault in Mackenzie District (this is the fault we are most concerned about in Waitaki). Also, the use of 'buildings and structures' is inconsistent with 'allotments, buildings and infrastructure' used in associated Policy NH-P9. | Amend SUB-R16 as follows:<br>Activity status: Discretionary<br>Where:<br>DIS-1<br>A zone of deformation associated with fault rupture is mapped at a scale of at least 1:10,000 ~~to create a fault avoidance zone~~; and<br>DIS-2<br>The subdivision layout provides for future allotments, buildings and structures to be set back at least ~~20~~ 50 metres from the zone of deformation of the fault rupture on the downthrown side of the fault and 100 metres from the zone of deformation of the fault rupture on the upthrown side of the fault. | Accept |
| **305.153** | Erin Nivonne Schultz | Subdivision | SUB-R16 Subdivision of a site located fully or partially in the | Support | Supports a discretionary activity status for subdivisions, other than boundary adjustments. | Seeks to retain as notified. | Accept in part |

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| | | | Surface Fault Rupture Hazard A | | | | |
| **306.153** | Waitaki Property Guardians Incorporated | Subdivision | SUB-R16 Subdivision of a site located fully or partially in the Surface Fault Rupture Hazard A | Support | Supports a discretionary activity status for subdivisions, other than boundary adjustments. | Seeks to retain as notified. | Accept in part |
| **271.421** | Canterbury Regional Council | Subdivision | SUB-R17 Subdivision of a site located fully or partially in the Future Urban Growth Overlay | Support | Generally, supports rule SUB-R17 'Subdivision of a site located fully or partially in the Future Urban Growth Overlay' so as to ensure the potential opportunity for land parcels to develop.<br>[Inferred submission summary] | Retain SUB-R17 'Subdivision of a site located fully or partially in the Future Urban Growth Overlay' as notified | Accept |
| **271.408** | Canterbury Regional Council | Subdivision | SUB-R2 Updating of a cross-lease title All zones Activity status: Controlled Where: | Support | Generally, supports as neutral SUB-R2 'Up-dating of a cross-lease title'.<br>[Inferred as specific reasons not given] | Retain SUB-R2 'Up-dating of a cross-lease title' as notified. | Accept |
| **244.91** | Telecommunication Companies | Subdivision | SUB-R3 Subdivision of land solely to create an allotment for the purpose of public works, infr | Support | Considers that the rule appropriately provides for the subdivision of land for infrastructure purposes. However, seeks amendment to remove reference to “legal mechanisms” from the matters of discretion, as this term is unclear and should not be included. | Seeks to amend matter of discretion 3 as follows:<br>3. the provision of infrastructure and its protection ~~through legal mechanisms.~~<br>[inferred relief requested] | Reject |
| **271.409** | Canterbury Regional Council | Subdivision | SUB-R3 Subdivision of land solely to create an allotment for the purpose of public works, infr | Support | Generally, supports and is neutral with regards to SUB-R3 'Subdivision of land solely to create an allotment for the purpose of public works, infrastructure, reserves or access'.<br>[Inferred as specific reasons not given] | Retain SUB-R3 as notified. | Accept |
| **288.70** | Network Waitaki Limited | Subdivision | SUB-R3 Subdivision of land solely to create an allotment for the purpose of public works, infr | Support | Supports this rule no specific reason given. | Retain as notified. | Accept |
| **163.50** | Fire and Emergency New Zealand | Subdivision | SUB-R4 Subdivision that creates any vacant allotment(s) All zones, except the General R | Support | Support as notified to the extent that it is subject to SUB-S5 and SUB-S6 and the matters of discretion include 'the provision of infrastructure and services for drinking water and firefighting supply'. | Retain as notified. | Accept |
| **166.41** | Horticulture New Zealand | Subdivision | SUB-R4 Subdivision that creates any vacant allotment(s) All zones, except the General R | Support | Supports in part and seeks that the matters of control should address reverse sensitivity concerns to give effect to the intent of the plan. | Add another matter of control as follows:<br>X. measures proposed to avoid potential adverse effects, including reverse sensitivity effects, on existing and permitted primary production activities. | Reject |
| **193.15** | Ohau Company Trust (Shelton Downs Station) | Subdivision | SUB-R4 Subdivision that creates any vacant allotment(s) All zones, except the General R | Amend | Considers SUB-R4 'Subdivision that creates any vacant allotment(s)' where SUB-S1 Minimum allotment sizes and dimensions are not complied with should be a Discretionary Activity instead of Non-Complying. | Amend SUB-R4 'Subdivision that creates any vacant allotment(s)' in GRUZ as follows:<br>Activity status when compliance is not achieved: Discretionary<br>Where:<br>DIS-1<br>Compliance is not achieved with CON-1(4)-(9)<br>DIS-2<br>Compliance is not achieved with CON-1(1)<br>Activity status when compliance is not achieved: Non-Complying<br>Where:<br>~~NC-1~~<br>~~Compliance is not achieved with CON-1(1)~~ | Reject |
| **195.29** | New Zealand Pork Industry Board | Subdivision | SUB-R4 Subdivision that creates any vacant | Support | Support in part but seek the matters of control should specifically address reverse sensitivity concerns to give effect to the plan's wider policy approach | Amend the matters of control as follows: | Reject |

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| | | | allotment(s) All zones, except the General R | | | measures proposed to avoid potential adverse effects, including reverse sensitivity effects, on existing and permitted primary production activities. | |
| **244.92** | Telecommunication Companies | Subdivision | SUB-R4 Subdivision that creates any vacant allotment(s) All zones, except the General R | Support | Considers that the rule recognises that need for connection to telecommunication networks as required under standard SUB-S9 | Retain as notified. | Accept |
| **271.410** | Canterbury Regional Council | Subdivision | SUB-R4 Subdivision that creates any vacant allotment(s) All zones, except the General R | Support | Supports SUB-R4 'Subdivision that creates any vacant allotment(s)' as there is consideration of flood assessment, water supply and wastewater. | Retain SUB-R4 'Subdivision that creates any vacant allotment(s)' as notified. | Accept |
| **305.146** | Erin Nivonne Schultz | Subdivision | SUB-R4 Subdivision that creates any vacant allotment(s) All zones, except the General R | Support | Considers that subdivisions creating vacant allotments should generally retain the current rule framework, subject to amended standards as set out in this submission. Considers that straightforward rural subdivisions should be controlled where standards are met if SUB-S1 is amended as in this submission. | Seeks to retain the rule and activity status SUB-R4 –All zones<br>Seeks to retain the rule and activity status, if SUB-S1 is amended as per submission. Alternatively, seeks a default activity status where compliance is not achieved with CON-1(1) as discretionary. | Reject |
| **306.146** | Waitaki Property Guardians Incorporated | Subdivision | SUB-R4 Subdivision that creates any vacant allotment(s) All zones, except the General R | Support | Considers that subdivisions creating vacant allotments should generally retain the current rule framework, subject to amended standards as set out in this submission. Considers that straightforward rural subdivisions should be controlled where standards are met if SUB-S1 is amended as in this submission. | Seeks to retain the rule and activity status SUB-R4 –All zones<br>Seeks to retain the rule and activity status, if SUB-S1 is amended as per submission. Alternatively, seeks a default activity status where compliance is not achieved with CON-1(1) as discretionary. | Reject |
| **83.28** | Waitaki District Council | Subdivision | SUB-R4 Subdivision that creates any vacant allotment(s) All zones, except the General R | Amend | Submitter seeks to relax activity status for GRUZ subdivisions that comply with standards but are within HPL, provided applicants demonstrate that productive capacity is maintained. | Amend the activity status for SUB-R4(CON-2) as follows:<br>General Rural Zone<br>Activity status: Controlled<br>Where:<br>CON-1<br>All of the following standards are complied with where relevant:<br>1. SUB-S1 Minimum allotment sizes and dimensions;<br>2. SUB-S2 Subdivision in the Otago Flood Assessment Overlay and Waitaki River Floodplain Assessment Overlay;<br>3. SUB-S3 Subdivision in the Canterbury Flood Assessment Overlay;<br>4. SUB-S5 Access;<br>5. SUB-S6 Water supply;<br>6. SUB-S7 Wastewater disposal;<br>7. SUB-S8 Stormwater management;<br>8. SUB-S9 Electricity and telecommunications;<br>9. SUB-S10 Esplanade reserves and esplanade strips; and<br>CON-2<br>Activity status when compliance is not achieved: Restricted Discretionary<br>Where:<br>RDIS-1<br>Compliance is not achieved with CON-1(2)<br>Matters of discretion are restricted to:<br>1. the matters of discretion listed in SUB-S2.<br>Where:<br>RDIS-2<br>Compliance is not achieved with CON-1(3) and the new allotment(s) are located within the Canterbury Flood Assessment Overlay, but are not located in a High Hazard Area, as determined in a flood assessment prepared in accordance with NH-S1.<br>Matters of discretion are restricted to:<br>1. the matters of discretion listed in SUB-S3.<br>RDIS-3 | Reject |

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| | | | | | | | The allotments are not classified as highly productive land.<br><br>Note: This rule applies in addition to any other applicable Subdivision Rules.<br><br>Matters of control are restricted to:<br><br>1. the design and layout of allotments; and<br><br>2. the provision and design of legal and physical access to and from the allotments, including roads and pedestrian and cycle ways; and<br><br>3. consent notices; and<br><br>4. easements; and<br><br>5. the location of the building platform; and<br><br>6. the bulk, location and colour of future buildings and structures; and<br><br>7. the provision of infrastructure and services for drinking water and firefighting supply, wastewater and stormwater, telecommunications and energy and its protection through legal mechanisms; and<br><br>8. the provision of esplanade reserves or esplanade strips and the relevant objectives and policies in the Public Access chapter; and<br><br>9. natural hazard and geotechnical constraints. | Compliance is not achieved with CON-2.<br><br>Matters of discretion are restricted to:<br><br>1. that it can be demonstrated that the overall productive capacity of the subject land will be retained over the long term.<br><br>Activity status when compliance is not achieved: Discretionary<br><br>Where:<br><br>DIS-1<br><br>Compliance is not achieved with CON-1(4)-(9)<br><br>Activity status when compliance is not achieved: Non-Complying<br><br>**Where:**<br><br>NC-1<br><br>Compliance is not achieved with CON-1(1)<br><br>Where:<br><br>NC-2<br><br>Compliance is not achieved with RDIS-3~~CON-2~~<br><br>Where:<br><br>NC-3<br><br>Compliance is not achieved with RDIS-2 | |
| **246.214** | Federated Farmers of New Zealand Incorporated | Subdivision | SUB-R4 Subdivision that creates any vacant allotment(s) All zones, except the General R | Support | The submitters support in part. They support a controlled-activity pathway for creating vacant lots in the GRUZ and want reverse-sensitivity measures added to the matters of control. They oppose making subdivisions that fail CON-1(1) or CON-2, or any subdivision of HPL, non-complying, as this removes reasonable land-use options for farmers. Smaller-lot subdivision may be needed where parts of a farm are uneconomic, and the NPS-HPL already provides circumstances where subdivision can be considered. They seek rural subdivision under 20 ha to be a restricted discretionary activity, with clear matters of discretion, as the effects are identifiable and do not justify a discretionary or non-complying status. | The submitters seek amendment of SUB-R4 to:<br><br>1. add a new matter of control or discretion to subdivision in all zones, to ensure measures to avoid, remedy or mitigate reverse sensitivity effects on existing and lawfully established primary production activities, are considered.<br><br>2. delete the non-complying activity status.<br><br>3. provide for subdivision of HPL land in certain circumstances, as provided for in the NPS-HPL.<br><br>4. provide for subdivision of all other GRUZ that is smaller than the proposed minimum site size of 20 ha, as a restricted discretionary activity. | | | Reject |

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| **251.249** | Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki | Subdivision | SUB-R4 Subdivision that creates any vacant allotment(s) All zones, except the General R | Oppose | Considers that the subdivision rules are overly onerous for whenua set aside for Kāi Tahu settlement purposes, with fully discretionary or non-complying activity status and SUB-S1 site size requirements for papakāika development failing to provide an enabling consenting framework or give effect to the operative PORPS provisions, including MW-P4 and MW-M5(2), particularly in the General Rural Zone and overlay areas. Considers also that the CON-2 requirements in SUB-R4 and SUB-R5 relating to highly productive land are inappropriate, as they do not recognise or give effect to the NPS-Highly Productive Land provisions for specified Māori land. | Seeks to amend SUB-R4, SUB-R5 to:<br>1. remove the application of CON-2 in the General Rural Zone to Māori land and Native Reserves<br>2. remove the application of SUB-S1 to Māori land and Native Reserves<br>Seeks to make any other amendments to rules and standards as necessary to enable subdivision of Māori land and Native Reserves by Kāi Tahu. | Reject |
| **163.51** | Fire and Emergency New Zealand | Subdivision | SUB-R5 Subdivision of land around existing lawfully established buildings or buildings approve | Support | Support as notified to the extent that it is subject to SUB-S5 and SUB-S6 and the matters of discretion include 'the provision of infrastructure and services for drinking water and firefighting supply'. | Retain as notified. | Accept |
| **168.6** | Kāinga Ora | Subdivision | SUB-R5 Subdivision of land around existing lawfully established buildings or buildings approve | Support | Supports in part: Supports the rule and activity status (for all zones incl GRUZ), but considers there should be no minimum allotment size or dimensions as the relevant bulk and location standards will manage the effects and ensure an appropriate outcome. | Seeks to amend SUB-R5 (All Zones and GRUZ) as follows:<br>Activity status: Controlled<br>Where:<br>CON-1<br>All of the following standards are complied with where relevant:<br>~~1.SUB-S1 Minimum allotment sizes and dimensions;~~<br>~~2~~1. SUB-S5 Access;<br>...<br>Matters of control are restricted to:<br>1.~~the size~~, design and layout of allotments; and<br>... | Reject |
| **244.93** | Telecommunication Companies | Subdivision | SUB-R5 Subdivision of land around existing lawfully established buildings or buildings approve | Support | Considers that the rule recognises that need for connection to telecommunication networks as required under standard SUB-S9 | Retain as notified. | Accept |
| **271.411** | Canterbury Regional Council | Subdivision | SUB-R5 Subdivision of land around existing lawfully established buildings or buildings approve | Support | Supports SUB-R5 'Subdivision of land around existing lawfully established buildings or buildings approved as part of a resource consent application where no vacant allotments are created' as there is consideration of flood assessment, water supply, wastewater. | Retain SUB-R5 'Subdivision of land around existing lawfully established buildings or buildings approved as part of a resource consent application where no vacant allotments are created' as has been notified. | Accept |
| **305.147** | Erin Nivonne Schultz | Subdivision | SUB-R5 Subdivision of land around existing lawfully established buildings or buildings approve | Support | Considers that subdivision around existing lawful buildings should generally be enabled subject to amended standards set out in this submission. Considers that controlled activity status is appropriate for straightforward rural subdivisions where standards are achieved subject to amendments to CON-1(1) as in this submission. | Seeks to retain the rule and activity status SUB-R5 –All zones<br>Seeks to retain the rule and activity status, if SUB-S1 is amended as per submission. Alternatively, seeks a default activity status where compliance is not achieved with CON-1(1) as discretionary. | Accept |
| **306.147** | Waitaki Property Guardians Incorporated | Subdivision | SUB-R5 Subdivision of land around existing lawfully established buildings or buildings approve | Support | Considers that subdivision around existing lawful buildings should generally be enabled subject to amended standards set out in this submission. Considers that controlled activity status is appropriate for straightforward rural subdivisions where standards are achieved subject to amendments to CON-1(1) as in this submission. | Seeks to retain the rule and activity status SUB-R5 –All zones<br>Seeks to retain the rule and activity status, if SUB-S1 is amended as per submission. Alternatively, seeks a default activity status where compliance is not achieved with CON-1(1) as discretionary. | Accept |
| **246.215** | Federated Farmers of New Zealand Incorporated | Subdivision | SUB-R5 Subdivision of land around existing lawfully established buildings or buildings approve | Support | The submitters support in part. They support a controlled-activity pathway for subdivision around existing lawfully established buildings in the GRUZ where no new vacant lots are created. For subdivisions that do not meet CON-1(2)–(7), they consider the effects are well understood and can be clearly listed, so a restricted discretionary status is more appropriate than discretionary. This would give landowners and the Council greater certainty and efficiency. | The submitters seek amendment of SUB-R5 so when compliance is not achieved with CON-1(2)-(7) the rule has restricted discretionary status, and identify the effects of the activity on the values they are seeking to protect (i.e. matters of discretion). | Reject |
| **251.250** | Te Rūnanga o Waihao, Te Rūnanga o Moeraki and | Subdivision | SUB-R5 Subdivision of land around existing lawfully | Oppose | Considers the subdivision consenting regime inappropriate for Māori land and Native Reserves. The submitter considers that easing requirements is essential to enable Kāi | Seeks to amend SUB-R4, SUB-R5 as follows: | Reject |

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| | Kāti Huirapa Rūnaka ki Puketeraki | | established buildings or buildings approve | | Tahu development consistent with the PORPS. [refer to original submission for full reasons] | 1. remove the application of CON-2 in the General Rural Zone to Māori land and Native Reserves<br><br>2. remove the application of SUB-S1 to Māori land and Native Reserves<br><br>Make any other amendments to rules and standards as necessary to enable subdivision of Māori land and Native Reserves by Kāi Tahu. | |
| **83.29** | Waitaki District Council | Subdivision | SUB-R5 Subdivision of land around existing lawfully established buildings or buildings approve | Amend | Submitter seeks for a relaxation of activity status for subdivisions around existing dwellings that comply with the relevant standards but are on HPL, provided long term productivity can be demonstrated. | Amend SUB-R5 (GRUZ) to read as follows:<br><br>General Rural Zone<br><br>Activity status: Controlled<br><br>Where:<br><br>CON-1<br><br>All of the following standards are complied with where relevant:<br><br>1. SUB-S1 Minimum allotment sizes and dimensions;<br><br>2. SUB-S5 Access;<br><br>3. SUB-S6 Water supply;<br><br>4. SUB-S7 Wastewater disposal;<br><br>5. SUB-S8 Stormwater management;<br><br>6. SUB-S9 Electricity and telecommunications;<br><br>7. SUB-S10 Esplanade reserves and esplanade strips; and<br><br>CON-2<br><br>The allotments are not classified as highly productive land.<br><br>Note: This rule applies in addition to any other applicable Subdivision Rules.<br><br>Matters of control are restricted to:<br><br>1. the size, design and layout of allotments; and<br><br>2. the provision and design of legal and physical access to and from the allotments, including roads and pedestrian and cycle ways; and<br><br>3. consent notices; and<br><br>4. easements; and<br><br>5. the location of the building platform; and<br><br>Activity status when compliance is not achieved: Restricted Discretionary<br><br>Where:<br><br>RDIS-1<br><br>Compliance is not achieved with CON-2.<br><br>Matters of discretion are restricted to:<br><br>1. That it can be demonstrated that the overall productive capacity of the subject land will be retained over the long term<br><br>Activity status when compliance is not achieved: Discretionary<br><br>Where:<br><br>DIS-1<br><br>Compliance is not achieved with CON-1(2)-(7)<br><br>Activity status when compliance is not achieved: Non-Complying<br><br>Where:<br><br>NC-1<br><br>Compliance is not achieved with CON-1(1)<br><br>Where:<br><br>NC-2<br><br>Compliance is not achieved with RDIS-1 ~~CON-2~~ | Reject |

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| | | | | | | | 6. bulk, location and colour of future buildings and structures;<br><br>7. the provision of infrastructure and services for drinking water and<br><br>firefighting supply, wastewater and stormwater, telecommunications and energy and any protections through legal mechanisms; and<br><br>8. the provision of esplanade reserves or esplanade strips and the relevant objectives and policies in the Public Access chapter; and<br><br>9. natural hazard and geotechnical constraints. | | |
| **193.16** | Ohau Company Trust (Shelton Downs Station) | Subdivision | SUB-R6 Subdivision in the Liquefaction Assessment Overlay All zones Activity status: | Amend | Considers SUB-R6 'Subdivision in the Liquefaction Assessment Overlay' should enable control over building platforms to be not within the overlay, where possible. | Amend SUB-R6 as follows:<br><br>Activity status: Controlled<br><br>Note: This rule applies in addition to any other applicable Subdivision Rules.<br><br>Matters of control are restricted to:<br><br>1. site specific geotechnical conditions and recommendations from a suitably qualified geotechnical engineer; and<br><br>2. location, size and design of the subdivision, roads, access, services; and<br><br>~~2.~~3. location of buildings ~~platforms~~<br><br>~~3.~~4.any recommendations and solutions for foundations for future buildings from a suitably qualified geotechnical engineer; and<br><br>~~4.~~5.remediation and ground treatment.<br><br>Note: Section 88 Information Requirements for Applications:<br><br>Pursuant to s88 of the RMA, any application for activities made under these provisions must provide, in addition to the standard information requirements, a geotechnical report that demonstrates the appropriateness of the site for the proposed development. | | Reject |
| **252.62** | Hollamby Family Trust | Subdivision | SUB-R6 Subdivision in the Liquefaction Assessment Overlay All zones Activity status: | Support | Support in part however considers the additional costs associated with geotechnical report come without any consultation or site-specific groundwork of liquefaction report.<br><br>Concerns the mapping of liquefaction zones affects property values, subdivision and building potential and insurance premiums. Considers the inclusion on landholdings should be justified with appropriate evidence from a geotechnical engineer which would provide detail for potential subdivision consent applications. | Seeks to amend as follows:<br><br>Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any application for activities made under these provisions must provide, in addition to the standard information requirements, a geotechnical report that demonstrates the appropriateness of the~~site~~for the proposed development,where this is not provided as part of the justification of the liquefaction overlay on the PDP maps.<br><br>Seeks to retain controlled status. | | Reject |
| **271.412** | Canterbury Regional Council | Subdivision | SUB-R6 Subdivision in the Liquefaction Assessment Overlay All zones Activity status: | Support | Supports SUB-R6 'Subdivision in the Liquefaction Assessment Overlay'.<br><br>[No reasons provided specific to the relief sought] | Retain SUB-R6 'Subdivision in the Liquefaction Assessment Overlay' as notified. | | | Accept |
| **271.413** | Canterbury Regional Council | Subdivision | SUB-R7 Subdivision creating a lot in the National Grid | Support | Neutral, taken as generally supportive of SUB-R7 'Subdivision creating a lot in the National Grid Substation Buffer'. | Retain SUB-R7 'Subdivision creating a lot in the National Grid Substation Buffer'. | | | Reject |

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| | | | Substation Buffer All zones Ac | | [inferred relief requested] | | |
| **309.105** | Transpower New Zealand Limited | Subdivision | SUB-R7 Subdivision creating a lot in the National Grid Substation Buffer All zones Ac | Oppose | Opposes the rule for subdivision creating lots in the National Grid Substation Buffer, as buffers are unnecessary in Waitaki District. | Seeks to delete the provision. | Accept |
| **197.61** | PowerNet Limited | Subdivision | SUB-R8 Subdivision creating an allotment within an Electricity Distribution Corridor Al | Support | Supports this provision in part, noting that some parts of the electricity distribution network in Waitaki District are owned by OJV and are managed by PowerNet, therefore, seeks an amendment to this rule to ensure it applies to the relevant owner of the asset. | Seeks to amend as follows:<br>SUB-R8 Subdivision creating an allotment within an Electricity Distribution Corridor<br>Activity status: Restricted Discretionary<br>Where:<br>RDIS-1<br>All resulting allotments, except allotments for access or a public work, demonstrate thatany identified building platform is located outside the~~Electricity Distribution Yard but within the~~Electricity Distribution Corridor.<br>Notification:<br>...<br>Notice of any application for resource consent under this rule must be served on the electricity distribution company who owns or operates the line (which may be Network Waitaki Limited orOtagoNet Joint Venture)in accordance with Clause 10(2) of the Resource Management (Forms, Fees, and Procedure) Regulations 2003. | Accept in part |
| **271.414** | Canterbury Regional Council | Subdivision | SUB-R8 Subdivision creating an allotment within an Electricity Distribution Corridor Al | Support | Neutral, taken as generally supportive of SUB-R8 'Subdivision creating an allotment within an Electricity Distribution Corridor'.<br>[Inferred submission summary] | Retain SUB-R8 as notified. | Accept in part |
| **288.71** | Network Waitaki Limited | Subdivision | SUB-R8 Subdivision creating an allotment within an Electricity Distribution Corridor Al | Support | Supports this provision and seeks some minor amendments. | Seeks to amend as follows:<br>SUB-R8<br>Subdivision creating an allotment within an Electricity Distribution Corridor<br>All zones Activity status: Restricted Discretionary<br>Where:<br>RDIS-1<br>~~Any identified building platform is located outside the Electricity Distribution Yard but within the Electricity Distribution Corridor.~~<br>All resulting allotments, except allotments for access or a public work, demonstrate thatany identified building platform is located outside of the Electricity DistributionCorridor~~Yard~~.<br>Note: This rule applies in addition to any other applicable Subdivision Rules.<br>Matters of discretion are restricted to:<br>1. the matters in INF-P5.<br>Activity status when compliance is not achieved: Non-Complying<br>Where:<br>NC-1<br>Compliance is not achieved with RDIS-1 | Accept in part |
| **271.415** | Canterbury Regional Council | Subdivision | SUB-R9 Subdivision creating an allotment in the National Grid Subdivision Corridor All | Support | Neutral, taken as generally supportive of SUB-R9 'Subdivision creating an allotment in the National Grid Subdivision Corridor'.<br>[Inferred submission summary] | Retain SUB-R9 as notified. | Accept |

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| **309.106** | Transpower New Zealand Limited | Subdivision | SUB-R9 Subdivision creating an allotment in the National Grid Subdivision Corridor All | Support | Supports the rule for subdivision creating allotments in the National Grid Subdivision Corridor, aligning with NPSET. | Seeks to retain as notified. | Accept |
| **43.2** | Tim Walton | Subdivision | SUB-S1 Minimum allotment sizes and dimensions Rural Lifestyle Zone 3000m2 n | Amend | Considers that average lot sizes in the RLZ are unnecessary. A minimum lot size of 5000m2 is sufficient to maintain amenity of the zone. | Inferred request to remove reference to an average lot size in RLZ and replace with a minimum lot size of 5000m2. | Reject |
| **73.5** | Marcelo Carena | Subdivision | SUB-S1 Minimum allotment sizes and dimensions Zone Minimum lot size Minimum | Amend | Considers that the WDC should not consider the same district-wide sizes across the district. For instance, 300m$^2$ could be a normal size for Ōamaru and other towns but does not make sense in Lake Ōhau Village.<br><br>Also, allotments for new subdivisions should not be considered a discretionary activity for significant natural areas and outstanding natural landscapes, considering an added risk for earthquakes and other emergencies. At this moment, Lake Ōhau Village is creating a community resilience group to prepare for an Alpine Fault Earthquake (and to prevent more wildfires) as the chances of an earthquake of magnitude 8+ is 75% in the next 50 years. Why would you add more isolated towns and residential lots ? The submitter considers that it is contradictory to permit building intensification due to its Natural Hazard vulnerability. | Seeks to amend SUB-S1 to provide an alternative Minimum lot size of 500-600m$^2$ for Lake Ōhau Village and not to reduce the GRUZ 20 ha net site area Minimum lot size for lifestyle rural sections. Also, SUB-R13 for Subdivision of a site containing all or part of a SNA identified in SCHED6 - SNAs and SUB-R10 Subdivision of a site located fully or partially within an ONF or Landscape Overlay should not start from a Discretionary Activity given the Natural Hazard risk. | Reject |
| **147.5** | Peter Plunket | Subdivision | SUB-S1 Minimum allotment sizes and dimensions Zone Minimum lot size Minimum | Oppose | Considers that the following clause in SUB-S1(d) is ambiguous: 'For the purpose of calculating any average, any allotment greater than 4 hectares, including the balance, is deemed to be 4 hectares.' | Seeks to delete the final clause in SUB-S1(d) Rural Lifestyle Zone: '~~For the purpose of calculating any average, any allotment greater than 4 hectares, including the balance, is deemed to be 4 hectares~~.' | Reject |
| **165.95** | Bryry Trust | Subdivision | SUB-S1 Minimum allotment sizes and dimensions Zone Minimum lot size Minimum | Oppose | Partly opposes restricting subdivision sizes as it impacts maximum site yield and thus property values and the difficulty in subdividing makes them so large they are undesirable or too much work for future occupants. Smaller lot sizes are able to protect values through PDP Overlay rules. Justification for an economic unit and minimum allotment size has also not been evidenced. | Seeks that a working group is developed to consider alternative options to set limits. Specifically, to consider:<br><br>- Distance to settlement and urban areas. If you are within 5km of a settlement is there potential for [a] lower set size ?<br><br>- Consideration of the upper Waitaki Basin which has extensive Overlays;<br><br>- Protecting HPL - What constitutes a productive block – is 20ha really productive and efficient ?<br><br>- Can there be a range of lot sizes that would allow averages, with the current status quo of a title the baseline, which would protect values but allow for some development ? | Reject |
| **168.7** | Kāinga Ora | Subdivision | SUB-S1 Minimum allotment sizes and dimensions Zone Minimum lot size Minimum | Support | Support for minimum lot sizes and dimensions for the General and Medium Density Residential Zones subject to the relief sought for SUB-R5 [submission ref. 168.6] | Retain minimum lot sizes and minimum dimensions for the General and Medium Residential Zones subject to the relief sought for SUB-R5 [submission ref. 168.6] | Reject |
| **200.1** | Mike Lowe | Subdivision | SUB-S1 Minimum allotment sizes and dimensions Zone Minimum lot size Minimum | Oppose | Considers SUB-S1 'Minimum allotment sizes and dimensions' Zone b. Medium Density Residential Zone is too large and opposed as it only allows 4 homes on a 1012m$^2$ Waitaki section whereas this should provide for 5. Considers the minimum lot size should be reduced to 150m$^2$. | Seeks SUB-S1 'Minimum allotment sizes and dimensions' Zone b. Medium Density Residential Zone is amended as follows:<br><br>Zone b. Medium Density Residential Zone: ~~200~~ 150 m$^2$ net site area<br><br>... | Reject |
| **200.2** | Mike Lowe | Subdivision | SUB-S1 Minimum allotment sizes and dimensions Zone Minimum lot size Minimum | Oppose | Considers that the average of 1 hectare for the RLZ (SUB-S1(d)) should be removed as it reduces the ability to develop a lot of sites viably. | Seeks to remove the 1 hectare average provision | Reject |
| **258.32** | Bryce Burnett | Subdivision | SUB-S1 Minimum allotment sizes and dimensions Zone Minimum lot size Minimum | Support | Partly opposes restricting subdivision sizes as it impacts maximum site yield and thus property values and the difficulty in subdividing makes them so large they are undesirable or too much work for future occupants. Smaller lot sizes are able to protect values through PDP Overlay rules. Justification for an economic unit and minimum allotment size has also not been evidenced. | Seeks to develop standards that allow for some flexibility in lot size within zones such as an average minimum lot size of 20ha per 200ha must be maintained in the General Rural Zone.<br><br>If this approach is not adopted due to differential standards, then seeks to retain the current subdivision standards within the current Operative District Plan. | Reject |

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| **271.422** | Canterbury Regional Council | Subdivision | SUB-S1 Minimum allotment sizes and dimensions Zone Minimum lot size Minimum | Support | Generally, supports SUB-S1 'Minimum allotment sizes and dimensions' to recognise infrastructure servicing constraints. However, an amendment to the standard is sought to ensure consistency with CLWRP rules covering sites less than 4000m$^2$. | Amend the standard as follows:<br>c. Settlement Zone<br>400m$^2$ net site area where the site is reticulated.<br>~~3~~ 4000m2 where the site is not reticulated<br>d. Rural Lifestyle Zone<br>3000m$^2$ net site area where the site is reticulated, provided the average lot size is not less than 1 hectares; or<br>~~5~~ 4000m$^2$ where the site is not reticulated, providing the average lot size is not less than 1 hectare | Reject |
| **287.118** | P K M Farms Limited | Subdivision | SUB-S1 Minimum allotment sizes and dimensions Zone Minimum lot size Minimum | Amend | Considers the intention of minimum allotment sizes is to protect productive land and overlay values, but notes that restrictions can significantly impact property values and requires careful consideration. The submitter questions whether all rural land should be treated the same, highlights the complexity of defining a productive block, and notes that subdivision could make some farming operations financially unviable by removing productive land. [refer to original submission] | Seeks to establish a working group to consider alternative options to set subdivision lot sizes. [refer to original submission]<br>To consider:<br>- Distance to settlement and urban areas. If you are within 5km of a settlement is there potential for lower set size.<br>- Consideration of the upper waitaki basin which has extensive overlays<br>- Protecting Highly Productive Soils<br>- What constitutes a productive block – is 20ha really effective.<br>- Can there be a range of lot sizes that would allow averages, with the current status quo of a title the baseline, which would protect values but allow for some development. | Reject |
| **305.154** | Erin Nivonne Schultz | Subdivision | SUB-S1 Minimum allotment sizes and dimensions Zone Minimum lot size Minimum | Support | Support for minimum allotment sizes for GRZ, MRZ, SETZ, RLZ and GRUZ. | Seeks to retain SUB-S1(a) to SUB-S1(e) as notified. | Accept |
| **306.154** | Waitaki Property Guardians Incorporated | Subdivision | SUB-S1 Minimum allotment sizes and dimensions Zone Minimum lot size Minimum | Support | Support for minimum allotment sizes for GRZ, MRZ, SETZ, RLZ and GRUZ. | Seeks to retain SUB-S1(a) to SUB-S1(e) as notified. | Accept |
| **140.1** | Alan James Gibson | Subdivision | SUB-S1 Minimum allotment sizes and dimensions General Rural Zone 20 ha net s | Oppose | Objects to the proposed increase in minimum lot size from 4ha to 20ha in the General Rural Zone. Considers the change is excessive and unnecessary for North Otago and would have negative impacts on land use flexibility and rural community vitality. Considers a 10ha minimum to be a more balanced alternative, supporting primary production while avoiding the adverse effects of the proposed 20ha threshold. | Reduce the General Rural Zone minimum net site area to 10ha in SUB-S1(e). | Reject |
| **302.332** | Peter and Sandra Mitchell | Subdivision | SUB-S1 Minimum allotment sizes and dimensions General Rural Zone 20 ha net s | Support | Supports proposed standard [refer to original submission] | [refer to original submission] | Reject |
| **311.7** | Helen Jansen | Subdivision | SUB-S1 Minimum allotment sizes and dimensions Outstanding Natural Features or L | Support | Supports in part - protection and kaitiakitanga (guardianship) of the land is at the heart of the Geopark philosophy. | Support and seeks amendments for Outstanding Natural Features (or other UNESCO Geopark Sites) where there is potential to lower the minimum size to 20ha, with offsetting enhancement, and WWGT [Waitaki Whitestone Geopark Trust] written approval has been obtained. | Reject |
| **147.1** | Peter Plunket | Subdivision | SUB-S1 Minimum allotment sizes and dimensions Zone Minimum lot size Minimum | Amend | Supports the 20ha minimum lot size in the General Rural Zone but considers that a larger minimum lot size should also be applied. | Seeks a larger minimum lot size for the General Rural Zone. | Reject |
| **176.17** | Terramark Limited | Subdivision | SUB-S1 Minimum allotment sizes and dimensions Zone Minimum lot size Minimum | Support | Supports in part / neutral on SUB-S1 'Minimum allotment sizes and dimensions' however exemptions are required in GRUZ for boundary adjustments / farm succession to occur. | Seeks that the SUB-S1 'Minimum allotment sizes and dimensions' minimum GRUZ lot size is retained with the proviso that rules are included that enable subdivision such as boundary adjustments to occur. | Reject |

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| **193.17** | Ohau Company Trust (Shelton Downs Station) | Subdivision | SUB-S1 Minimum allotment sizes and dimensions Zone Minimum lot size Minimum | Amend | Considers that RSL, SNF, ONF, ONL and Shelton Downs Precinct (proposed) should have their Minimum lot size reduced. | Amend SUB-S1 'Minimum allotment sizes and dimensions' for RSL, SNF and the Shelton Downs Precinct as follows:<br>f. Rural Scenic Landscape and Significant Natural Features - 20~~40~~ha net site area<br>g. Outstanding Natural Features or Landscapes - ~~100~~20ha net site area<br>Shelton Downs Precinct - 15ha net site area | Reject |
| **246.220** | Federated Farmers of New Zealand Incorporated | Subdivision | SUB-S1 Minimum allotment sizes and dimensions Zone Minimum lot size Minimum | Support | The submitters support in part. They accept the 20 ha minimum for the GRUZ. They oppose the larger minimum allotment sizes for the RSL and SNF (40 ha) and ONF/ONL (100 ha). They also emphasise that farmers may need to create smaller, saleable lots for income or succession planning. They note that subdivision itself does not affect ONF, ONL, SNF, or RSL values. Subdivision simply creates titles and does not necessarily lead to new buildings or earthworks. They also oppose the inclusion of the RSL in the plan, consistent with their broader concerns raised in submissions on the NFL chapter. | The submitter seeks the inclusion of rules that enable:<br>1. necessary subdivision such as boundary adjustments to occur<br>2. subdivision of GRUZ land that does not meet minimum site sizes as a restricted discretionary activity.<br>The submitter also seek deletion of the minimum lot sizes for ONF, ONL, SNF and RSL, such that they are subject to the minimum lot size for their underlying zoning. | Reject |
| **252.64** | Hollamby Family Trust | Subdivision | SUB-S1 Minimum allotment sizes and dimensions Zone Minimum lot size Minimum | Oppose | Considers subdivision of GRUZ to 20ha potentially to be worse for the community and protection of productive land. Opposes restricting subdivision sizes as it will hinder efficient and effective farm operations by limiting production scale and reducing economic viability. | Seeks to amend as follows:<br>General Rural Zone – consideration of alternative options that may better restore the productive value and accessibility of farmland as well as provide for new housing. | Reject |
| **305.155** | Erin Nivonne Schultz | Subdivision | SUB-S1 Minimum allotment sizes and dimensions Zone Minimum lot size Minimum | Oppose | Considers that the proposed large minimum allotment sizes within RSL, SNF, ONL/F overlays are not sufficiently justified. Considers that smaller minimum allotment sizes would adequately manage fragmentation while supporting productive rural land use. [refer to original submission for full reasons] | Seeks to amend as follows:<br>f. Rural Scenic Landscape and Significant Natural Features ~~40~~ 20ha net site area<br>g. Outstanding Natural Features and Landscapes ~~100~~ 20ha net site area | Reject |
| **306.155** | Waitaki Property Guardians Incorporated | Subdivision | SUB-S1 Minimum allotment sizes and dimensions Zone Minimum lot size Minimum | Oppose | Considers that the proposed large minimum allotment sizes within RSL, SNF, ONL/F overlays are not sufficiently justified. Considers that smaller minimum allotment sizes would adequately manage fragmentation while supporting productive rural land use. [refer to original submission for full reasons] | Seeks to amend as follows:<br>f. Rural Scenic Landscape and Significant Natural Features ~~40~~ 20ha net site area<br>g. Outstanding Natural Features and Landscapes ~~100~~ 20ha net site area | Reject |
| **193.18** | Ohau Company Trust (Shelton Downs Station) | Subdivision | SUB-S10 Esplanade reserves and esplanade strips All zones Where a subdivision of lan | Amend | Amend SUB-S10 'Esplanade reserves and esplanade strips' that should not have to provide PA where there are already linkages. | Amend SUB-S10 as follows:<br>1. Where a subdivision of land creates an allotment (including any balance allotment) that is less than 4ha in area and which adjoins the bank(s) of a waterbody over 3m in width, that allotment must set aside an esplanade reserve or esplanade strip with a minimum width of 20 metres, unless there is existing public access.<br>2. where a subdivision of land creates an allotment (including any balance allotment) that is less than 4ha in area and which adjoins Mean High Water Springs, that allotment must set aside an esplanade reserve or esplanade strip with a minimum width of 20 metres. | Reject |
| **271.427** | Canterbury Regional Council | Subdivision | SUB-S10 Esplanade reserves and esplanade strips All zones Where a subdivision of lan | Support | Generally, supports SUB-S10 'Esplanade reserves and esplanade strips' and the increase in the extent and protection of esplanades.<br>[Inferred as specific reasons not given] | Retain SUB-S10 'Esplanade reserves and esplanade strips' as publicly notified. | Accept |
| **305.161** | Erin Nivonne Schultz | Subdivision | SUB-S10 Esplanade reserves and esplanade strips All zones Where a subdivision of lan | Support | Supports the esplanade provisions that align with requirements of the Act. | Seeks to retain as notified. | Accept |
| **306.161** | Waitaki Property Guardians Incorporated | Subdivision | SUB-S10 Esplanade reserves and esplanade strips All zones Where a subdivision of lan | Support | Supports the esplanade provisions that align with requirements of the Act. | Seeks to retain as notified. | Accept |
| **271.423** | Canterbury Regional Council | Subdivision | SUB-S3 Subdivision in the Canterbury Flood Assessment Overlay All Zones Any new allo | Support | Generally, supports SUB-S3 'Subdivision in the Canterbury Flood Assessment Overlay'. | Retain SUB-S3 'Subdivision in the Canterbury Flood Assessment Overlay' as requested. | Accept |

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| **166.42** | Horticulture New Zealand | Subdivision | SUB-S4 Building platform General Residential Zone Medium Density Residential Zone | Support | Supports building platform criteria which requires compliance with setbacks. | Retain as notified. | Accept |
| **194.75** | Director-General of Conservation | Subdivision | SUB-S4 Building platform General Residential Zone Medium Density Residential Zone | Support | Considers that ensuring building platforms can reasonably be located outside of SNAs and other overlay areas will help achieve objectives SUB-O1 and SUB-O2 and related policies. | Retain SUB-S4 'Building platform' as notified. | Accept |
| **195.30** | New Zealand Pork Industry Board | Subdivision | SUB-S4 Building platform General Residential Zone Medium Density Residential Zone | Support | Support standard | Retain as notified | Accept |
| **152.56** | New Zealand Transport Agency Waka Kotahi | Subdivision | SUB-S5 Access All zones All allotments must have legal and physical access to a road | Amend | Supports in part compliance with the transport chapter provisions and considers this should include the proposed new rule regarding vehicle crossing to State Highways | Seek that point 3 be added as follows:<br>3. Any vehicle crossing to a State Highway shall comply with TRAN-RX | Reject |
| **163.52** | Fire and Emergency New Zealand | Subdivision | SUB-S5 Access All zones All allotments must have legal and physical access to a road | Support | Supports all lots created to have legal and physical access to a road and a compliant vehicle crossing. | Retain as notified. | Accept |
| **233.75** | KiwiRail Holdings Limited | Subdivision | SUB-S5 Access All zones All allotments must have legal and physical access to a road | Support | Support for a standard which requires compliance with TRAN-P17 access standards in all zones including level crossing setbacks and retaining level crossing sightlines. | Seeks to retain as notified. | Accept |
| **305.156** | Erin Nivonne Schultz | Subdivision | SUB-S5 Access All zones All allotments must have legal and physical access to a road | Support | Considers that legal access is necessary for all allotments, but physical access should not always be required at the time of subdivision and that requiring vehicle crossings only where there is one practical option is more appropriate. | Seeks to amend as follows:<br>'1. All allotments must have legal ~~and physical~~ access to a road.<br>2. Where physical access is provided, any vehicle crossing shall comply with TRAN-R1 and TRAN-S13, TRAN-S14, TRAN-S15, TRAN-S16 and TRAN-S17.' | Reject |
| **306.156** | Waitaki Property Guardians Incorporated | Subdivision | SUB-S5 Access All zones All allotments must have legal and physical access to a road | Support | Considers that legal access is necessary for all allotments, but physical access should not always be required at the time of subdivision and that requiring vehicle crossings only where there is one practical option is more appropriate. | Seeks to amend as follows:<br>'1. All allotments must have legal ~~and physical~~ access to a road.<br>2. Where physical access is provided, any vehicle crossing shall comply with TRAN-R1 and TRAN-S13, TRAN-S14, TRAN-S15, TRAN-S16 and TRAN-S17.' | Reject |
| **163.53** | Fire and Emergency New Zealand | Subdivision | SUB-S6 Water Supply All zones Where a connection to reticulated water supply system | Support | Supports in part to the extent that all lots shall be provided with a water supply connection or a self-sufficient potable water supply both including firefighting water supply.<br>Seeks amendment to address firefighting water supply requirements at the time of subdivision. | Amend as follows:<br>...<br>2. where a connection to reticulated water supply system is unavailable, all allotments shall be provided with a self-sufficient potable water supply, with a minimum volume of 10,000 litres ~~(which includes firefighting water supply).~~; and<br>3. demonstrate how all allotments will be provided with a firefighting water supply compliant with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.<br>Note: SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice should be consulted when determining the most appropriate design for firefighting water supply. ~~The New Zealand Fire Service~~Fire and Emergency New Zealand is available to assist with this. | Reject |
| **305.157** | Erin Nivonne Schultz | Subdivision | SUB-S6 Water Supply All zones Where a connection to reticulated water supply system | Oppose | Considers that water supply should be assessed at subdivision but may not be required for all rural allotments and that potable water supply requirements should be excluded from rural zones where no future buildings are proposed. | Seeks to amend as follows:<br>...<br>2. Except in the General Rural Zone, where a connection to reticulated water supply system is unavailable, all allotments shall be provided with a self-sufficient potable water supply, with a minimum volume of 10,000 litres (which includes firefighting water supply). | Reject |

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| **306.157** | Waitaki Property Guardians Incorporated | Subdivision | SUB-S6 Water Supply All zones Where a connection to reticulated water supply system | Oppose | Considers that water supply should be assessed at subdivision but may not be required for all rural allotments and that potable water supply requirements should be excluded from rural zones where no future buildings are proposed. | Seeks to amend as follows:<br>...<br>2. Except in the General Rural Zone, where a connection to reticulated water supply system is unavailable, all allotments shall be provided with a self-sufficient potable water supply, with a minimum volume of 10,000 litres (which includes firefighting water supply). | Reject |
| **176.15** | Terramark Limited | Subdivision | SUB-S7 Wastewater disposal All zones Where a connection to reticulated wastewater sy | Support | Supports SUB-S7 'Wastewater disposal' in part, however the submitter states it is entirely inappropriate and unnecessary to require the design and installation of onsite infrastructure and services to lots at the time of subdivision given the Building Consent process may not be contemporaneous. | Seeks that SUB-S7 'Wastewater disposal' is amended as follows:<br>1. Where a connection to reticulated wastewater system is unavailable and wastewater is to be disposed of on-site:<br>a. provision shall be made for all allotments ~~shall~~ to be ~~provided with~~ serviced by a septic tank, or soakage field, or an alternative means to dispose of sewage in a sanitary manner within the net site area of the allotment;<br>... | Reject |
| **246.221** | Federated Farmers of New Zealand Incorporated | Subdivision | SUB-S7 Wastewater disposal All zones Where a connection to reticulated wastewater sy | Support | The submitters support in part. They note that rural sites are typically fully self-serviced for wastewater, with design and installation occurring later at the building-consent stage. Requiring onsite wastewater design or installation at subdivision is, in their view, unnecessary. Most GRUZ—and likely most RLZ—sites are large enough to accommodate compliant onsite disposal even on poorer soils, and the Council has provided no evidence of widespread constraints. They oppose 2(c)(i), arguing it should only apply where there is a genuine likelihood of wastewater challenges. Without technical assessment from the Council, they oppose the condition entirely. They support linking the standard to regional council requirements, noting that most onsite domestic discharges are permitted subject to conditions. | The submitters seek amendment of SUB-S7 as follows:<br>1. where a connection to reticulated wastewater system is available, all new allotments must be provided with a connection at the allotment boundary; or<br>2. where a connection to reticulated wastewater system is unavailable and wastewater is to be disposed of on-site:<br>a. provision shall be made for all allotments ~~shall~~ to be ~~provided with~~ serviced by aseptic tank, or soakage field, or an alternative means to dispose of sewage in a sanitary manner within the net site area of the allotment;<br>b. where sewage is to be disposed to ground, that area shall not be subject to instability, or inundation, or used for the disposal of stormwater;<br>~~c. either:~~<br>~~i. a certificate from a suitably qualified wastewater engineer shall be provided, certifying that on-site disposal can be achieved in accordance with the requirements of the relevant regional plan; or~~<br>~~ii. a copy of an approved resource consent for the on-site disposal from the relevant regional council shall be provided.~~<br>3. where a connection to reticulated wastewater system is unavailable, and wastewater is to be disposed of by way of a community wastewater scheme and separate wastewater disposal field, these must be legally held together in a manner that they cannot be disposed of separately from any allotment without the express permission of the Waitaki District Council.<br>Note: Where disposal of wastewater is to land and/or water, the discharge must also comply with the requirements of ~~resource consent from~~ the Canterbury or Otago Regional Council ~~may be required~~. | Reject |
| **271.424** | Canterbury Regional Council | Subdivision | SUB-S7 Wastewater disposal All zones Where a connection to reticulated wastewater sy | Support | Generally, supports SUB-S7 'Wastewater disposal' as a necessary standard to recognise and address infrastructure servicing constraints and no change is requested. | Retain SUB-S7 'Wastewater disposal' as notified. | Accept |
| **305.158** | Erin Nivonne Schultz | Subdivision | SUB-S7 Wastewater disposal All zones Where a connection to reticulated wastewater sy | Oppose | Considers that wastewater disposal should be capable of being provided but does not need to be installed at subdivision for all rural or primary production sites. Considers that wastewater systems should instead be designed and provided at the time of development. [refer to original submission for full reasons] | Seeks to amend as follows:<br>1. Except in the General Rural Zone, where a connection to reticulated wastewater system is available, all new allotments must be provided with a connection at the allotment boundary; or<br>2. Except in the General Rural Zone, where a connection to reticulated wastewater system is unavailable and wastewater is to be disposed of on-site:<br>~~a. all allotments shall be provided with a septic tank, or soakage field, or an alternative means to dispose of sewage in a sanitary manner within the net site area of the allotment;~~<br>... | Reject |

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| **306.158** | Waitaki Property Guardians Incorporated | Subdivision | SUB-S7 Wastewater disposal All zones Where a connection to reticulated wastewater sy | Oppose | Considers that wastewater disposal should be capable of being provided but does not need to be installed at subdivision for all rural or primary production sites. Considers that wastewater systems should instead be designed and provided at the time of development. [refer to original submission for full reasons] | Seeks to amend as follows:<br>1. Except in the General Rural Zone, where a connection to reticulated wastewater system is available, all new allotments must be provided with a connection at the allotment boundary; or<br>2. Except in the General Rural Zone, where a connection to reticulated wastewater system is unavailable and wastewater is to be disposed of on-site:<br>~~a. all allotments shall be provided with a septic tank, or soakage field, or an alternative means to dispose of sewage in a sanitary manner within the net site area of the allotment;~~<br>... | Reject |
| **233.76** | KiwiRail Holdings Limited | Subdivision | SUB-S8 Stormwater management All zones Stormwater management must be provided in acc | Support | Supports the requirement to for new allotments to comply with the Stormwater Chapter standards. KiwiRail seek to protect the rail corridor from stormwater discharge which can undermine rail infrastructure. | Seeks to retain as notified. | Accept |
| **246.222** | Federated Farmers of New Zealand Incorporated | Subdivision | SUB-S8 Stormwater management All zones Stormwater management must be provided in acc | Support | Support in part: The submitter supports in part SUB-S8. Considering the linkage to regional council requirements is helpful, suggesting the note is in the same form as for SUB-S7. Oppose onsite stormwater provisions that are proposed within the STORM chapter (see our submission points on the STORM provisions). | The submitters seek amendment of SUB-S8 as follows:<br>1. stormwater management must be provided in accordance with the Standards in the Stormwater chapter.<br>2. where a connection to a reticulated stormwater management system is available, all new allotments must be provided with a connection at the allotment boundary.<br>3. where a connection to stormwater systems is not available and the means of stormwater disposal is to ground, that part of the site must not be identified on the Planning Maps as being subject to instability or inundation, or be used for the disposal of wastewater.<br>Note: ~~the Otago Regional Plan: Water also has rules for the disposal of stormwater~~ Where disposal of stormwater is to land and/or water, the discharge must also comply with the requirements of the Canterbury or Otago Regional Council. | Reject |
| **271.425** | Canterbury Regional Council | Subdivision | SUB-S8 Stormwater management All zones Stormwater management must be provided in acc | Support | Generally, supports SUB-S8 'Stormwater management' as a necessary standard to recognise and address infrastructure servicing constraints. | Retain SUB-S8 as notified. | Accept |
| **305.159** | Erin Nivonne Schultz | Subdivision | SUB-S8 Stormwater management All zones Stormwater management must be provided in acc | Oppose | Considers that stormwater management should be assessed at subdivision but may not be necessary for rural allotments without development. Considers that stormwater systems should be addressed at construction stage and excluded from rural zone subdivision requirements. [refer to original submission for full reasons] | Seeks to amend as follows:<br>1. Except for in the General Rural Zone, Stormwater management must be provided in accordance with the Standards in the Stormwater chapter.<br>2. Except in the Rural General Zone,where a connection to a reticulated stormwater management system is available, all new allotments must be provided with a connection at the allotment boundary.<br>... | Reject |
| **306.159** | Waitaki Property Guardians Incorporated | Subdivision | SUB-S8 Stormwater management All zones Stormwater management must be provided in acc | Oppose | Considers that stormwater management should be assessed at subdivision but may not be necessary for rural allotments without development. Considers that stormwater systems should be addressed at construction stage and excluded from rural zone subdivision requirements. [refer to original submission for full reasons] | Seeks to amend as follows:<br>1. Except for in the General Rural Zone, Stormwater management must be provided in accordance with the Standards in the Stormwater chapter.<br>2. Except in the Rural General Zone,where a connection to a reticulated stormwater management system is available, all new allotments must be provided with a connection at the allotment boundary.<br>... | Reject |
| **1.1** | Gordon Clark | Subdivision | SUB-S9 Electricity and telecommunications | Amend | Considers that clarity is required around the term 'accessway' in SUB-S9 to clearly describe its intended use as not being primarily for pedestrian access purposes. | Seeks to amend SUB-S9: Electricity and Telecommunications as follows:<br>General Residential Zone<br>Medium Density Residential Zone<br>1. All allotments must have provision for: | Reject |

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| | | | | | | a. fibre optic cable connections; and<br>b. electricity connections.<br>2. where two or more allotments share an ~~accessway~~ access, the fibre optic cable or electricity connections must be available from where the ~~accessway~~ access joins the main body of each allotment.<br>All other zones<br>3. All allotments must have provision for:<br>a. Telecommunication connections; and<br>b. Electricity connections.<br>4. where two or more allotments share an ~~accessway~~ access, the telecommunication or electricity connection must be available from where the ~~accessway~~ access joins the main body of each allotment. | |
| **176.16** | Terramark Limited | Subdivision | SUB-S9 Electricity and telecommunications General Residential Zone Medium Density Re | Support | Supports SUB-S9 'Electricity and telecommunications' in part apart from in the GRUZ as given the availability of alternative technologies, telecommunications and electricity connections are not always needed for rural sites yet still provide a workable and appropriate framework for infrastructure. | Seeks deletion of electricity and telecommunication requirements at subdivision in GRUZ. | Reject |
| **200.3** | Mike Lowe | Subdivision | SUB-S9 Electricity and telecommunications General Residential Zone Medium Density Re | Oppose | Opposes SUB-S9 'Electricity and telecommunications' references to 'fibre optic cable' due to the cost and low Waitaki uptake thus far. | Seeks an amendment to SUB-S9 'Electricity and telecommunications' as follows:<br>...<br>1. All allotments must have provision for:<br>a. ~~fibre optic cable~~ telecommunications connections; and<br>b. electricity connections.<br>2. where two or more allotments share an accessway, ~~the fibre optic cable~~telecommunications or electricity connection must be available from where the accessway joins the main body of each allotment.<br>... | Accept |
| **244.94** | Telecommunication Companies | Subdivision | SUB-S9 Electricity and telecommunications General Residential Zone Medium Density Re | Support | Considers that a standard requiring connections to telecommunications in all zones are supported. However, considers that allotments in all zones (except General Rural) should be required to connect to an open access fibre network, and subdivisions in General Rural can connect wirelessly. | Seeks to delete Standard S9 as notified and replace with the following:<br>All allotments, other than allotments for access, roads, utilities or reserves, must be provided with connections at the boundary of the net area of the allotment to an electricity supply and telecommunication service unless evidence is provided that a suitable alternative supply can be provided, and a consent notice is proposed alerting future purchasers. In all zones except General Rural, the connection to a telecommunication service must be through an open access fibre network. In the general rural zone the applicant shall provide written confirmation from a telecommunication network operator confirming that a telecommunications connection (fibre, mobile or wireless including satellite) can be provided to all new allotments and describing how this can be achieved. In all zones, at the time of subdivision, sufficient land for telecommunications, and any associated ancillary services must be set aside. For a subdivision that creates more than 15 lots, consultation with telecommunications network utility operators will be required. All necessary easements for the protection of telecommunications network utility services must be duly granted and reserved. This standard does not apply to allotments for a utility, road, reserve or for access purposes | Reject |
| **246.223** | Federated Farmers of New Zealand Incorporated | Subdivision | SUB-S9 Electricity and telecommunications General Residential Zone Medium Density Re | Support | Support in part. They oppose applying SUB-9 in the GRUZ, noting telecommunications may not be necessary or feasible in rural areas. They also argue that electricity connections are not always needed on rural sites. Modern off-grid options, such as solar systems. | Seeks to amend as follows:<br>SUB-S9<br>All other zones, except the General Rural Zone | Reject |
| **271.426** | Canterbury Regional Council | Subdivision | SUB-S9 Electricity and telecommunications General Residential Zone Medium Density Re | Support | Generally supports, SUB-S9 'Electricity and telecommunications' as a new standard is sought to ensure that in all zones, telecommunications and electricity provision is provided for at the time of subdivision.<br>[Inferred as specific reasons not given] | Retain SUB-S9 'Electricity and telecommunications' as notified. | Accept |

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| **305.160** | Erin Nivonne Schultz | Subdivision | SUB-S9 Electricity and telecommunications General Residential Zone Medium Density Re | Oppose | Considers that electricity and telecommunications connections are not always necessary or practicable in rural areas. Considers that rural zones should be excluded from mandatory service connection requirements at subdivision. [refer to original submission for full reasons] | Seeks to exclude GRUZ from electricity and telecommunication requirements at subdivision as follows:<br>SUB-S9 All other zones, except General Rural Zone | Reject |
| **306.160** | Waitaki Property Guardians Incorporated | Subdivision | SUB-S9 Electricity and telecommunications General Residential Zone Medium Density Re | Oppose | Considers that electricity and telecommunications connections are not always necessary or practicable in rural areas. Considers that rural zones should be excluded from mandatory service connection requirements at subdivision. [refer to original submission for full reasons] | Seeks to exclude GRUZ from electricity and telecommunication requirements at subdivision as follows:<br>SUB-S9 All other zones, except General Rural Zone | Reject |
| **259.75** | Otago Regional Council | Subdivision | User Notes: For some activities, a resource consent may be required by rules in more than one ch | Support | Supports the inclusion of User Notes in the subdivision chapter that make reference to ORC consent requirements for servicing at the time of subdivision. | Seeks to retain as notified. | Accept |

# Appendix 3
# Submissions on Withdrawn Provisions

# Appendix 3
# Submissions on Withdrawn Provisions

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# Subdivision

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|---|---|---|---|---|---|---|
| **76.10** | John Laurie (and others) | Subdivision | General Rural Zone 20 ha net site area N/A | Oppose | Opposes a 20ha minimum allotment size as inappropriate for rural GRUZ land as such a size would be approaching that considered inappropriate under the NPS-HPL and may fail to achieve the policy framework seeking to avoid reverse sensitivity upon existing primary production and the fragmentation of productive land. On the basis of the above assessment that it does not maintain the rural amenity of the zone, they recommend that the GRUZ 20ha minimum lot size is instead increased from 20ha to 40ha. | Amend SUB-S1 'Minimum allotment sizes and dimensions' as follows:<br>...<br>e. General Rural Zone ~~20~~40 ha net site area N/A<br>... |
| **76.13** | John Laurie (and others) | Subdivision | Outstanding Natural Features or Landscapes 100 ha net site area N/A | Amend | [Refer to original submission for reasons]<br>Considers that SUB-S1 g. is supported, except for ONF (or other UNESCO Geopark Sites) where there is the potential to lower the minimum size to 20ha, with offsetting enhancement, and Waitaki Whitestone Geopark Trust (WWGT) written approval has been obtained.<br>[See 76.10 Submission Point] | Seeks to lower ONF minimum lot size to 20ha, with offsetting enhancement, and Waitaki Whitestone Geopark Trust (WWGT) written approval has been obtained. |
| **76.11** | John Laurie (and others) | Subdivision | Rural Scenic Landscape and Significant Natural Features 40 ha net site area N/A | Oppose | Opposes a 40ha minimum allotment size as inappropriate for RSL, SNF overlay land as it does not maintain the rural amenity of the zone through inconsistency with Cross Boundary Matters of adjacent LAs. They recommend that the RSL, SNF 40ha minimum lot size is instead increased from 40ha to 80ha. | Amend SUB-S1 'Minimum allotment sizes and dimensions' as follows:<br>...<br>f. Rural Scenic Landscape and Significant Natural Features ~~40~~ 80 ha net site area N/A |
| **246.216** | Federated Farmers of New Zealand Incorporated | Subdivision | SUB-R10 Subdivision of a site located fully or partially within an Outstanding Natural Feature | Oppose | The submitters oppose the discretionary activity status for SUB-R10. They argue that subdivision itself does not affect ONFs or ONLs; any effects arise later from buildings, earthworks, or other land-use activities, which are already managed through the NFL chapter. Given their wider concerns about ONF/ONL mapping and the proposed 100 ha minimum lot size, they consider a default discretionary status unjustified and overly conservative. If a rule is retained for these overlays, they believe the Council can identify the relevant effects and should therefore adopt a restricted discretionary status with clearly listed matters of discretion. They do not consider the activity complex or uncertain enough to warrant a discretionary rule. | The submitters preferred relief is that the Council delete SUB-R10.<br>Our alternative relief is that the Council amend SUB-R10 to restricted discretionary status and identify the effects of the activity on the values they are seeking to protect (i.e. matters of discretion). |
| **251.251** | Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki | Subdivision | SUB-R10 Subdivision of a site located fully or partially within an Outstanding Natural Feature | Oppose | Considers that the subdivision rules are too onerous for Kāi Tahu land set aside for settlement purposes. The submitter considers that a more enabling approach is required to align with PORPS provisions and support papakāika development. [refer to original submission for full reasons] | Seeks amendments to provide a more enabling status for subdivision by Kāi Tahu on Māori land and Native Reserves.<br>Seeks to make any other amendments to rules and standards as necessary to enable subdivision of Māori land and Native Reserves by Kāi Tahu. |
| **253.139** | Royal Forest and Bird Protection Society of New Zealand Incorporated | Subdivision | SUB-R10 Subdivision of a site located fully or partially within an Outstanding Natural Feature | Support | No specific reason given. | Seeks to retain as notified. |
| **271.416** | Canterbury Regional Council | Subdivision | SUB-R10 Subdivision of a site located fully or partially within an Outstanding Natural Feature | Support | Supports SUB-R10 'Subdivision of a site located fully or partially within an Outstanding Natural Feature or Landscape Overlay' and the Discretionary Activity rule. | Retain SUB-R10 as publicly notified. |
| **305.148** | Erin Nivonne Schultz | Subdivision | SUB-R10 Subdivision of a site located fully or partially within an Outstanding Natural Feature | Support | Supports a discretionary activity status for subdivisions, other than boundary adjustments, within a landscape overlay, where these overlay are appropriately mapped. | Seeks to retain as notified. |
| **306.148** | Waitaki Property Guardians Incorporated | Subdivision | SUB-R10 Subdivision of a site located fully or partially within an Outstanding Natural Feature | Support | Supports a discretionary activity status for subdivisions, other than boundary adjustments, within a landscape overlay, where these overlay are appropriately mapped. | Seeks to retain as notified. |
| **176.14** | Terramark Limited | Subdivision | SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or A | Oppose | Opposes SUB-R11 'Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or Areas of Significance to Māori overlay, or a Notable Tree' as the potential effects of subdivision on HHI, SASM or TREE 100m from a proposed boundary will have no effects upon a resource and the Discretionary Activity status is not appropriate. | Seeks SUB-R11 'Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or Areas of Significance to Māori overlay, or a Notable Tree' is deleted or else the Activity status amended to Restricted Discretionary status with matters of discretion. |
| **183.46** | Beverley Anne Thomson | Subdivision | SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or A | Oppose | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br>SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or Areas of Significance to Māori overlay, or a Notable Tree, except in relation to land which is privately owned or residentially or rurally zoned. |

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| | | | | | | Seeks to add the following:<br><br>Note: this rules does not apply to land which is privately owned or residentially or rurally zoned. |
| **246.217** | Federated Farmers of New Zealand Incorporated | Subdivision | SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or A | Oppose | The submitters oppose the discretionary activity status for SUB-R11. They argue that subdivision itself does not affect Notable Trees, Historic Heritage items, or SASM features; any effects arise from later land-use activities, which are already managed in the HH, NFL, and SASM chapters. For Historic Heritage, they consider matters should be limited to HH-P13. Given their wider concerns with SASM mapping, they view a default discretionary status as unjustified and overly conservative. If a rule is retained, they prefer a restricted discretionary status with clearly listed matters of discretion to provide greater certainty for landowners and the Council. | Seeks to delete SUB-R11.<br><br>Alternatively, seeks to amend SUB-R11 to restricted discretionary status, and identify the effects of the activity on the values they are seeking to protect (i.e. matters of discretion). |
| **251.252** | Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki | Subdivision | SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or A | Oppose | Considers that the subdivision rules are too onerous for Kāi Tahu land set aside for settlement purposes. The submitter considers that a more enabling approach is required to align with PORPS provisions and support papakāika development. [refer to original submission for full reasons] | Seeks amendments to provide a more enabling status for subdivision by Kāi Tahu on Māori land and Native Reserves.<br><br>Seeks to make any other amendments to rules and standards as necessary to enable subdivision of Māori land and Native Reserves by Kāi Tahu. |
| **252.63** | Hollamby Family Trust | Subdivision | SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or A | Oppose | Opposes in part as the subdivision does not affect the listed values associated with the SASM then there is no need to trigger a consent requirement.<br><br>Considers consent requirement should only be triggered where the subdivision will likely cause effect on the listed values associated with the SASM. | Seeks to amend as follows:<br><br>Activity status:~~Discretionary~~Permitted<br><br>PER-1 – where the subdivision does not impact the listed values associated with the identified SASM;<br><br>Activity status where PER-1 is not achieved:<br><br>Discretionary |
| **255.22** | Bill and Angela Johnston | Subdivision | SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or A | Oppose | Considers that SUB-P11 'Reductions or waivers of esplanade reserves and esplanade strips' is opposed as drafted as if the Subdivision does not affect SASM SCHED5 Values then there is no reason for a reduction. | Amend SUB-P11 'Reductions or waivers of esplanade reserves and esplanade strips' as follows:<br><br>Activity status: ~~Discretionary~~Permitted<br><br>PER-1 – where the subdivision does not impact the listed values associated with the identified SASM;<br><br>Activity status where PER-1 is not achieved: Discretionary |
| **268.68** | Ryan and Hayley Ambler | Subdivision | SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or A | Oppose | Considers that SUB-P11 'Reductions or waivers of esplanade reserves and esplanade strips' is opposed as drafted as if the Subdivision does not affect SASM SCHED5 Values then there is no reason for a reduction. | Seeks to amend as follows:<br><br>Activity status:~~Discretionary~~Permitted<br><br>PER-1 – where the subdivision does not impact the listed values associated with the identified SASM;<br><br>Activity status where PER-1 is not achieved: Discretionary |
| **270.44** | Vivien Ann Paton & Graeme John Paton | Subdivision | SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or A | Amend | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br><br>SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or Areas of Significance to Māori overlay, or a Notable Tree, except in relation to land which is privately owned or residentially or rurally zoned.<br><br>Seeks to add the following:<br><br>Note: this rules does not apply to land which is privately owned or residentially or rurally zoned. |
| **271.417** | Canterbury Regional Council | Subdivision | SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or A | Support | Supports SUB-R11 'Subdivision of a site containing all or part of a Historic Heritage Item, a Site or Areas of Significance to Māori overlay, or a Notable Tree'. | Retain SUB-R11 as notified. |
| **273.61** | Colin and Catherine Harvey | Subdivision | SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or A | Oppose | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br><br>SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or Areas of Significance to Māori overlay, or a Notable Tree, except in relation to land which is privately owned or residentially or rurally zoned.<br><br>Seeks to add the following: |

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| | | | | | | Note: this rules does not apply to land which is privately owned or residentially or rurally zoned. |
| **274.61** | Garrie Alexander Farmer and Marilyn Anne Farmer | Subdivision | SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or A | Oppose | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br>SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or Areas of Significance to Māori overlay, or a Notable Tree, except in relation to land which is privately owned or residentially or rurally zoned.<br>Seeks to add the following:<br>Note: this rules does not apply to land which is privately owned or residentially or rurally zoned. |
| **275.47** | Mark & Nicky Hay | Subdivision | SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or A | Amend | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br>SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or Areas of Significance to Māori overlay, or a Notable Tree, except in relation to land which is privately owned or residentially or rurally zoned.<br>Seeks to add the following:<br>Note: this rules does not apply to land which is privately owned or residentially or rurally zoned. |
| **276.47** | Patrick Ronald Winders & Joan Patricia Winders | Subdivision | SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or A | Amend | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br>SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or Areas of Significance to Māori overlay, or a Notable Tree, except in relation to land which is privately owned or residentially or rurally zoned.<br>Seeks to add the following:<br>Note: this rules does not apply to land which is privately owned or residentially or rurally zoned. |
| **277.47** | Anthony & Jennifer Jane Hales | Subdivision | SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or A | Amend | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br>SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or Areas of Significance to Māori overlay, or a Notable Tree, except in relation to land which is privately owned or residentially or rurally zoned.<br>Seeks to add the following:<br>Note: this rules does not apply to land which is privately owned or residentially or rurally zoned. |
| **278.47** | Colin Willetts & Catherine Anderson | Subdivision | SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or A | Amend | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br>SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or Areas of Significance to Māori overlay, or a Notable Tree, except in relation to land which is privately owned or residentially or rurally zoned.<br>Seeks to add the following:<br>Note: this rules does not apply to land which is privately owned or residentially or rurally zoned. |
| **279.61** | Paul Joseph Rutledge | Subdivision | SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or A | Amend | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br>SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or Areas of Significance to Māori overlay, or a Notable Tree, except in relation to land which is privately owned or residentially or rurally zoned.<br>Seeks to add the following:<br>Note: this rules does not apply to land which is privately owned or residentially or rurally zoned. |
| **287.116** | P K M Farms Limited | Subdivision | SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or A | Oppose | Oppose in part, considers that subdivision should only trigger consent if it impacts the listed values associated with Sites and Areas of Significance to Māori (SASM). | Seeks to amend as follows:<br>Activity status: Permitted<br>PER-1 |

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| | | | | | | where the subdivision does not impact the listed values associated with the identified SASM;<br><br>Activity status where PER-1 is not achieved: Discretionary |
| **305.149** | Erin Nivonne Schultz | Subdivision | SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or A | Support | Supports a discretionary activity status for subdivisions, other than boundary adjustments, within a heritage or SASM overlay, where these overlays are appropriately mapped. | Seeks to retain as notified. |
| **306.149** | Waitaki Property Guardians Incorporated | Subdivision | SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or A | Support | Supports a discretionary activity status for subdivisions, other than boundary adjustments, within a heritage or SASM overlay, where these overlays are appropriately mapped. | Seeks to retain as notified. |
| **307.45** | Allan Gordon King & Erina Margaret King | Subdivision | SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or A | Amend | Considers it unreasonable and unjustified to apply the provision to privately owned land already zoned, subdivided, and used for residential or rural purposes and that neither the Ngāi Tahu Claims Settlement Act 1998, nor any other law, gives Kāi Tahu, rūnaka or other mana whenua any right of governance, access or other control over privately held land, or land which is not in the ownership of Kāi Tahu, rūnaka or other mana whenua. | Seeks to amend as follows:<br><br>SUB-R11 Subdivision of a site containing all or part of a Historic Heritage Item, a Sites or Areas of Significance to Māori overlay, or a Notable Tree, except in relation to land which is privately owned or residentially or rurally zoned.<br><br>Seeks to add the following:<br><br>Note: this rules does not apply to land which is privately owned or residentially or rurally zoned. |
| **246.218** | Federated Farmers of New Zealand Incorporated | Subdivision | SUB-R13 Subdivision of a site containing all or part of a Significant Natural Area identified | Oppose | The submitters oppose the discretionary activity status for SUB-R13. They argue that subdivision does not affect SNAs; any impacts arise from vegetation clearance, which is already managed through the ECO chapter. Given their wider concerns with SNA mapping, they consider a default discretionary status unjustified and overly conservative. If a rule is retained, they prefer a restricted discretionary status with clearly listed matters of discretion, as the effects are identifiable and do not warrant a discretionary rule. | The submitters preferred relief is that the Council delete SUB-R13.<br><br>The submitters alternative relief sought is that the Council amend SUB-R13 to restricted discretionary status and identify the effects of the activity on the values they are seeking to protect (i.e. matters of discretion). |
| **251.254** | Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki | Subdivision | SUB-R13 Subdivision of a site containing all or part of a Significant Natural Area identified | Oppose | Considers that the subdivision rules are too onerous for Kāi Tahu land set aside for settlement purposes. The submitter considers that a more enabling approach is required to align with PORPS provisions and support papakāika development. [refer to original submission for full reasons] | Seeks amendments to provide a more enabling status for subdivision by Kāi Tahu on Māori land and Native Reserves.<br><br>Seeks to make any other amendments to rules and standards as necessary to enable subdivision of Māori land and Native Reserves by Kāi Tahu. |
| **253.140** | Royal Forest and Bird Protection Society of New Zealand Incorporated | Subdivision | SUB-R13 Subdivision of a site containing all or part of a Significant Natural Area identified | Support | Retain as notified. | Retain as notified. |
| **271.419** | Canterbury Regional Council | Subdivision | SUB-R13 Subdivision of a site containing all or part of a Significant Natural Area identified | Support | Generally, supports SUB-R13 'Subdivision of a site containing all or part of a Significant Natural Area identified in SCHED6 – Significant Natural Areas'. However, this rule (R13) is not consistent with the CRPS which identifies “Land use and development, and the introduction and spread of animal and plant pests, have contributed to the ongoing loss and degradation of Canterbury’s ecosystems and indigenous biodiversity.” The potential for ongoing degradation would be high in this situation, particularly the spread of animal and plant pests. | Amend SUB-R13 'Subdivision of a site containing all or part of a Significant Natural Area identified in SCHED6 – Significant Natural Areas' as follows:<br><br>DIS-2<br><br>All vehicle access and building platforms are set back at least 200m from ~~located outside of~~ the Significant Natural Area; and |
| **287.117** | P K M Farms Limited | Subdivision | SUB-R13 Subdivision of a site containing all or part of a Significant Natural Area identified | Oppose | Opposes in part, considers that extensive mapping of overlays may have unintended consequences for subdivision and considers subdivision may not impact SNA and existing infrastructure can often support the subdivision eg existing tracks. | Seeks to amend as follows:<br><br>Activity status: Discretionary<br><br>Where:<br><br>...<br><br>DIS-2<br><br>Where existing infrastructure cannot be utilised all vehicle access and building platforms are located outside of the Significant Natural Area unless there is no acceptable alternative; and<br><br>... |
| **305.150** | Erin Nivonne Schultz | Subdivision | SUB-R13 Subdivision of a site containing all or part of a Significant Natural Area identified | Support | Supports a discretionary activity status for subdivisions, other than boundary adjustments, within the SNA overlay, where these overlays are appropriately mapped. | Seeks to retain as notified. |
| **306.150** | Waitaki Property Guardians Incorporated | Subdivision | SUB-R13 Subdivision of a site containing all or part of a Significant Natural Area identified | Support | Supports a discretionary activity status for subdivisions, other than boundary adjustments, within the SNA overlay, where these overlays are appropriately mapped. | Seeks to retain as notified. |

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| **246.219** | Federated Farmers of New Zealand Incorporated | Subdivision | SUB-R14 Subdivision of a site located fully or partially within the Coastal Environment | Oppose | The submitters oppose the discretionary activity status for SUB-R14. They argue that subdivision does not affect Coastal Environment (CE) values; any impacts arise later from buildings, earthworks, or other land-use activities, which are already managed through the CE chapter. They consider a default discretionary status unjustified and overly conservative. If a rule is retained, they prefer a restricted discretionary status with clearly defined matters of discretion, as the effects are identifiable and do not warrant a discretionary rule. | The submitters seek deletion of SUB-R14. Alternatively, if the Council does not want to delete SUB-R14, the submitters seek amendment of SUB-R14 to restricted discretionary status, and identification the effects of the activity on the values that the Council is seeking to protect (i.e. matters of discretion). |
| **251.255** | Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki | Subdivision | SUB-R14 Subdivision of a site located fully or partially within the Coastal Environment | Oppose | Considers that the subdivision rules are too onerous for Kāi Tahu land set aside for settlement purposes. The submitter considers that a more enabling approach is required to align with PORPS provisions and support papakāika development. [refer to original submission for full reasons] | Seeks amendments to provide a more enabling status for subdivision by Kāi Tahu on Māori land and Native Reserves.<br>Seeks to make any other amendments to rules and standards as necessary to enable subdivision of Māori land and Native Reserves by Kāi Tahu. |
| **253.141** | Royal Forest and Bird Protection Society of New Zealand Incorporated | Subdivision | SUB-R14 Subdivision of a site located fully or partially within the Coastal Environment | Support | Retain as notified. | Retain as notified. |
| **305.151** | Erin Nivonne Schultz | Subdivision | SUB-R14 Subdivision of a site located fully or partially within the Coastal Environment | Support | Supports a discretionary activity status for subdivisions, other than boundary adjustments, within the coastal environment overlay, where these overlays are appropriately mapped. | Seeks to retain as notified. |
| **306.151** | Waitaki Property Guardians Incorporated | Subdivision | SUB-R14 Subdivision of a site located fully or partially within the Coastal Environment | Support | Supports a discretionary activity status for subdivisions, other than boundary adjustments, within the coastal environment overlay, where these overlays are appropriately mapped. | Seeks to retain as notified. |