

Proposed Gore District Plan – s42A Report Table

Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S85.311	Environment Southland	Hazards and Risks map layers	Hazards maps - general	Support in part	Prevent any new zone changes from the current District Plan which have the potential to intensify land use change and development within a flood inundation area. Additionally, re-align GRZ to align with potential mining overlay. This comment applies to all zones and maps.	Intensifying development in flood prone (or hazard) areas will put communities at risk.	Reject in part
FS5.199	Hamish Weir			Oppose	Disallow		Accept in part
S124.006	Fire and Emergency NZ	Interpretation	natural hazard	Support	Retain as notified	Fire and Emergency supports the definition of natural hazard being consistent with section 2 of the RMA.	Accept
S35.039	Chorus New Zealand Limited	NH - Natural Hazards	NH-Additional provisions sought	Support in part	Add Note 3: Telecommunications infrastructure is exempt from having to comply with the provisions in this chapter	Activities regulated under the NESTF are exempt from having to comply with District Plan rules about natural hazards (Regulation 57) and confirmed by the NESTF user guide (section 6.11). It would be appropriate for the PDP to follow the same approach. The reason for the approach is due to industry practice. This practice is that the telecommunication companies rely on local authorities to identify hazards in their city or district, and the companies have resilience requirements as essential infrastructure networks and lifeline utilities under the Civil Defence Emergency Management Act 2002 (CDEMA) Resilience to natural hazards is provided by avoiding the hazard in the first instance, but where the hazard cannot be avoided for the infrastructure to provide its function, designing the infrastructure to be as resilient as possible to the hazard.	Accept in part
S124.022	Fire and Emergency NZ	NH - Natural Hazards	NH-Additional provisions sought	Amend	NH-P9 In areas assessed or identified as being potentially subject to elevated fire risk, ensure that an appropriate design and layout, including a buffer area or	Fire and Emergency request that Council consider adopting objectives and policies specific to wildfire.	Reject

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					setback, is provided for new subdivision and development, and the following matters are considered: (a) Access for emergency service vehicles, (b) Provision of and access to emergency firefighting water supply (c) Separation and management of vegetation (with regard to slope, aspect, management regimes and use of less flammable vegetation), and (d) The design and materials of any buildings.		
S124.023	Fire and Emergency NZ	NH - Natural Hazards	NH-Additional provisions sought	Amend	NH-P10 Manage wildfire risk by making provision for water supplies and access to buildings for firefighting and appropriate buffers are maintained between new building platforms and forest and bush areas.	Fire and Emergency request that Council consider adopting objectives and policies specific to wildfire.	Reject
S132.049	KiwiRail Holdings Ltd	NH - Natural Hazards	NH-Additional provisions sought	Amend	Create an additional rule that provides clarity and certainty for protection and maintenance of the rail network as a Permitted Activity in relation to defences against water.	NH-R3, NH-R4, and NH-R5 place limitations on KiwiRail protecting critical infrastructure. Alternative to the proposed amendments to those rules an additional Rule could be created to provide clarity for the rail network.	Reject
S154.039	Spark New Zealand Trading Limited	NH - Natural Hazards	NH-Additional provisions sought	Support in part	Add Note 3: Telecommunications infrastructure is exempt from having to comply with the provisions in this chapter	Activities regulated under the NESTF are exempt from having to comply with District Plan rules about natural hazards (Regulation 57), and confirmed by the NESTF user guide (section 6.11). It would be appropriate for the PDP to follow the same approach. The reason for the approach is due to industry practice. This practice is that the telecommunication companies rely on local authorities to identify hazards in their city or district, and the companies have resilience requirements as essential infrastructure networks and lifeline utilities under the Civil Defence Emergency Management Act 2002 (CDEMA) Resilience to natural hazards is provided by avoiding the hazard in the first instance, but where the hazard cannot be avoided for the infrastructure to provide its function, designing the	Accept in part

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						infrastructure to be as resilient as possible to the hazard.	
S32.039	One New Zealand Group Limited	NH - Natural Hazards	NH-Additional provisions sought	Support in part	Add Note 3: Telecommunications infrastructure is exempt from having to comply with the provisions in this chapter	Activities regulated under the NESTF are exempt from having to comply with District Plan rules about natural hazards (Regulation 57) and confirmed by the NESTF user guide (section 6.11). It would be appropriate for the PDP to follow the same approach. The reason for the approach is due to industry practice. This practice is that the telecommunication companies rely on local authorities to identify hazards in their city or district, and the companies have resilience requirements as essential infrastructure networks and lifeline utilities under the Civil Defence Emergency Management Act 2002 (CDEMA) Resilience to natural hazards is provided by avoiding the hazard in the first instance, but where the hazard cannot be avoided for the infrastructure to provide its function, designing the infrastructure to be as resilient as possible to the hazard.	Accept in part
S33.039	FortySouth	NH - Natural Hazards	NH-Additional provisions sought	Support in part	Add Note 3: Telecommunications infrastructure is exempt from having to comply with the provisions in this chapter	Activities regulated under the NESTF are exempt from having to comply with District Plan rules about natural hazards (Regulation 57) and confirmed by the NESTF user guide (section 6.11). It would be appropriate for the PDP to follow the same approach. The reason for the approach is due to industry practice. This practice is that the telecommunication companies rely on local authorities to identify hazards in their city or district, and the companies have resilience requirements as essential infrastructure networks and lifeline utilities under the Civil Defence Emergency Management Act 2002 (CDEMA) Resilience to natural hazards is provided by avoiding the hazard in the first instance, but where the hazard cannot be avoided for the infrastructure to provide its function, designing the infrastructure to be as resilient as possible to the hazard.	Accept in part
S37.039	Connexa Limited	NH - Natural Hazards	NH-Additional provisions sought	Support in part	Add Note 3: Telecommunications infrastructure is exempt from having to	Activities regulated under the NESTF are exempt from having to comply with District Plan rules about natural hazards (Regulation 57) and confirmed by	Accept in part

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					comply with the provisions in this chapter	the NESTF user guide (section 6.11). It would be appropriate for the PDP to follow the same approach. The reason for the approach is due to industry practice. This practice is that the telecommunication companies rely on local authorities to identify hazards in their city or district, and the companies have resilience requirements as essential infrastructure networks and lifeline utilities under the Civil Defence Emergency Management Act 2002 (CDEMA) Resilience to natural hazards is provided by avoiding the hazard in the first instance, but where the hazard cannot be avoided for the infrastructure to provide its function, designing the infrastructure to be as resilient as possible to the hazard.	
S115.070	Kevin Robertson	NH - Natural Hazards	NH-Additional provisions sought	Support	Include New Rule	There should be provision for unoccupied farm buildings in natural hazard areas as these have a lower risk than occupied buildings.	Accept in part
S143.081	Rural Ratepayers Group	NH - Natural Hazards	NH-Additional provisions sought	Support	Include New Rule	There should be provision for unoccupied farm buildings in natural hazard areas as these have a lower risk than occupied buildings.	Accept in part
S148.082	Alistair & Bernadette Hunt	NH - Natural Hazards	NH-Additional provisions sought	Support	Include New Rule	There should be provision for unoccupied farm buildings in natural hazard areas as these have a lower risk than occupied buildings.	Accept in part
S60.072	Ronald Crispin	NH - Natural Hazards	NH-Additional provisions sought	Support	Include New Rule	There should be provision for unoccupied farm buildings in natural hazard areas as these have a lower risk than occupied buildings.	Accept in part
S68.190	John Baynes	NH - Natural Hazards	NH-Additional provisions sought	Support	Include New Rule	There should be provision for unoccupied farm buildings in natural hazard areas as these have a lower risk than occupied buildings.	Accept in part
S126.069	Southland Federated Farmers of New Zealand	NH - Natural Hazards	NH-Additional provisions sought	Support	Include New Rule	There should be provision for unoccupied farm buildings in natural hazard areas as these have a lower risk than occupied buildings.	Accept in part
FS5.29	Hamish Weir			Support	Allow		Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S85.097	Environment Southland	NH - Natural Hazards	NH-Additional provisions sought	Support	Create a new policy to establish some management criteria for new subdivision and development where there is existing flood protection (eg Gore Main Street).	Additional provisions required to resolve gaps identified by the 2020 GNS report. The report identifies various areas where there are gaps that need new provisions. The draft NPS-NHD provides an indication of where national natural hazard management is going. The proposed Gore District Plan should consider using the terminology and other indicators in the NPS to guide how the chapter is written. This will pre-empt misalignment as national direction continues	Accept in part
FS5.30	Hamish Weir			Oppose	Disallow	Existing provisions are satisfactory	Reject
FS27.014	Alliance Group Limited			Oppose	Disallow	The submission seeks changes which are not specified in sufficient detail to allow potentially affected parties to comment meaningfully at this stage.	Reject in Part
FS29.040	Silver Fern Farms Limited			Oppose	Disallow	The submission seeks changes which are not specified in sufficient detail to allow potentially affected parties to comment meaningfully at this stage.	Reject in Part
S146.016	Southland District Council	NH - Natural Hazards	NH - General	Support in part	Alignment with National and Regional directives on Natural Hazard and Hazard sensitive Development. Align natural hazard objectives and policies with Southland District Council. Within the natural hazards section, include hazard sensitive development. Modify policies to identify specific levels of risk within the district.	Questions whether the national and regional directives been considered, e.g. Proposed National Policy Statement for Natural Hazard Decision-making 2023. The Section 32 report mentions Environment Southland conducting evaluations of natural hazards regionally, emphasising the need for consistent display of hazard risk information across councils to avoid cross-boundary issues with how Councils interpret the risk and subsequent policy responses. The submitter is concerned about the absence of hazard-sensitive development inclusion in the current Natural Hazard section of the District Plan.	Accept in part
S124.021	Fire and Emergency NZ	NH - Natural Hazards	NH - General	Support in part	Amendment sought - the inclusion of NH-P9 and NH-P10 as outlined.	Fire and Emergency have an interest in the natural hazards chapter insofar to ensure that the District Plan adopts a risk-based approach to flood management, considers the impacts of wildfire, and manages land use in areas subject to natural hazard. Managing land use in relation to flood hazards and the consequences of climate change will reduce the incidence of, and associated risk to	Reject

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						life and property, and prevent or limit injury, damage to property, land and the environment.	
S99.004	Clark Fortune McDonald & Associates	Hazards and Risks map layers	NH-MAP-Areas of Actual or Potential Inundation	Not Stated	Consult with Environment Southland in relation to this flood hazard to accurately identify the extent of it.	The flood hazard that appears in the PDP in relation to the PDP Rural Lifestyle zone around Mandeville appears to be inaccurately identified.	Accepted in part
S112.053	Waka Kotahi NZ Transport Agency	NH - Natural Hazards	NH-O1	Support	Retain as notified	Waka Kotahi supports these objectives	Accept
S121.045	Alliance Group Limited	NH - Natural Hazards	NH-O1	Support	Retain as notified	Alliance supports a flexible effects management approach towards natural hazard risks, which can be tailored to the risk profile of specific sites/proposals.	Accept
S40.036	Silver Fern Farms	NH - Natural Hazards	NH-O1	Support	Retain as notified	supports a flexible effects management approach towards natural hazard risks, which can be tailored to the risk profile of specific sites/proposals.	Accept
S132.041	KiwiRail Holdings Ltd	NH - Natural Hazards	NH-O1	Support	Retain as proposed.	KiwiRail supports objective NH - 01 which seeks to identify and manage risks associated with natural hazards to human health, property, infrastructure and the wider environment. KiwiRail supports the ongoing management of natural hazard risk.	Accept
S143.005	Rural Ratepayers Group	NH - Natural Hazards	NH-O1	Amend	Council shall ensure public are aware of all risk and dangers. Council shall indemnify landowners for any risk or harm that may occur to a member of the public as Council is encouraging & expediting public access.	Recognize that hazards are inherent in the Rural Zone. For example, bulls, livestock, electric fencing etc to the public who access streams and rivers. How do landowners give H&S briefings to visitors who are publicly accessing farmland courtesy of Councils empowerment? Some view rural areas as 'nature' although it is an industry in its own right.	Reject
S109.043	Department of Conservation	NH - Natural Hazards	NH-O2	Support	Retain as notified	The D-G supports the objective and policy which seeks to encourage the use, maintenance and enhancement of natural features and buffers to manage the risks of natural hazards on the environment. This is in line with the NPS-IB (Clause 3.6) which seeks that Local Authorities recognize the	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
						role of indigenous biodiversity in mitigating the effects of climate change.	
S112.054	Waka Kotahi NZ Transport Agency	NH - Natural Hazards	NH-O2	Support	Retain as notified	Waka Kotahi supports these objectives	Accept
S121.046	Alliance Group Limited	NH - Natural Hazards	NH-O2	Support	Retain as notified	Alliance agrees that natural hazard risks should be identified, and mitigation is an option to manage risks.	Accept
S143.006	Rural Ratepayers Group	NH - Natural Hazards	NH-O2	Amend	Council shall ensure public are aware of all risk and dangers. Council shall indemnify landowners for any risk or harm that may occur to a member of the public as Council is encouraging & expediting public access.	Recognize that hazards are inherent in the Rural Zone. For example, bulls, livestock, electric fencing etc to the public who access streams and rivers. How do landowners give H&S briefings to visitors who are publicly accessing farmland courtesy of Councils empowerment? Some view rural areas as 'nature' although it is an industry in its own right.	Reject
S112.056	Waka Kotahi NZ Transport Agency	NH - Natural Hazards	NH-O3	Support in part	Amend NH-O3 as follows: Ensure new subdivision and development activities are only located in areas where the natural hazard risk is: 2. not exacerbated on other sites and on land transport infrastructure.	We recommend that the objective include that the natural hazard risk on land transport infrastructure is not exacerbated.	Accept in part
S121.047	Alliance Group Limited	NH - Natural Hazards	NH-O3	Support	Retain as notified	Alliance agrees that new development should be able to be located in areas of natural hazard risk if it is adequately managed.	Accept in part
S125.017	Ministry of Education	NH - Natural Hazards	NH-O3	Support	Retain as proposed.	The submitter supports NH-O3 and acknowledges education facilities should only be established where natural hazard risks are mitigated and will not transference the risk to adjacent sites.	Accept in part
S132.042	KiwiRail Holdings Ltd	NH - Natural Hazards	NH-O3	Amend	Amend NH-O3 as follows: Ensure new subdivision and development activities are only located in areas where the natural hazard risk is 1. appropriately adequately-managed; and 2. not exacerbated on other sites and the rail network.	KiwiRail generally supports the objective but seeks to strengthen the objective to protect the safe and efficient operation of the rail network from new subdivisions and development activities. It is also recommended that the term "adequately" be changed for "appropriately". The term adequate refers to something that meets a minimum requirement; where appropriately refers to	Accept in part

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						something that is well suited to a specific situation.	
S85.085	Environment Southland	NH - Natural Hazards	NH-O3	Oppose	Provide for the avoidance of development where there is significant risk from natural hazards as required by the Southland Regional Policy Statement	There is no consideration for how new development will be managed where there is significant natural hazard risk. This objective is required to give effect to the Southland RPS and it does need reworded to achieve this. This links to other submission points about zoning new land for intensification of development.	Accept in part
FS5.20	Hamish Weir			Oppose	Disallow	Current provisions are adequate.	Reject
S112.057	Waka Kotahi NZ Transport Agency	NH - Natural Hazards	NH-O4	Support in part	Amend NH - O4 to either explain or define the term 'regional significant infrastructure' or amend the wording to ' critical infrastructure '	Waka Kotahi generally supports this objective but note that the wording 'regional significant infrastructure' is not defined in the Plan. Waka Kotahi request that consideration be given to either defining or explaining 'regional significant infrastructure' in the context of this objective or using the term 'critical infrastructure' which is defined in the Plan to provide greater clarity and certainty within this objective that it applies to the transport network.	Accept
S132.043	KiwiRail Holdings Ltd	NH - Natural Hazards	NH-O4	Amend	Amend as follows: Critical Regionally significant infrastructure is located outside hazard risk areas where practicable. Or define Regionally significant infrastructure in the proposed plan.	KiwiRail supports the objective, however, "regionally significant infrastructure" is not defined in the proposed plan. KiwiRail requests that "regionally significant infrastructure" is clearly defined in the proposed plan or the objective refers to critical infrastructure which has already been defined.	Accept
S85.086	Environment Southland	NH - Natural Hazards	NH-O4	Oppose in part	Clarification is needed about whether this objective is more permissive or restrictive than the Southland RPS.	The Southland RPS requires "critical infrastructure" to be located outside of natural hazard areas. Greater consideration should be given to prevent lifeline infrastructure from being established in natural hazard areas.	Reject
FS5.21	Hamish Weir			Oppose	Disallow	The Gore township would have to be entirely shifted off the flats to avoid any flood hazard. The practicalities of this are obstructive to upgrades for the sewer treatment ponds, electrical and telecommunications infrastructure, rail and roading.	Accept
FS21.067	Yrless Limited			Oppose in part	Disallow in part	It is not possible for critical lifelines to be constructed outside of all natural hazard areas. There are technical constraints to where equipment may need	Accept

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						to be located. Provide consistency with the RPS as much as practicable, accepting that there are technical constraints to location of infrastructure.	
S101.041	Transpower New Zealand Limited	NH - Natural Hazards	NH-O4	Support in part	Amend Objective NH-O4 as follows: "NH-O4 Regionally significant Critical infrastructure is located outside hazard risk areas except where there is an operational need or functional need for its location where practicable. "	Transpower notes that the term 'regionally significant infrastructure' has generally been replaced with 'critical infrastructure' in the Proposed District Plan. Transpower therefore considers that this Objective should refer to 'critical infrastructure'. It is not always possible for infrastructure to be located outside of hazard risk areas because: (a) Transpower is required to connect to electricity generation that may be located in a hazard risk area; and (b) linear infrastructure, such as the National Grid, necessarily traverses areas susceptible to hazards (such as rivers) in order to convey electricity over long distances between two points. These requirements are generally understood to be operational needs and functional needs. Transpower considers that reference to these needs more clearly sets out the circumstances where avoidance is not practicable.	Accept
FS24.026	Contact Energy Ltd			Support	Allow	Contact support the relief sought as it is noted the term 'regionally significant infrastructure' is not defined in the Proposed Gore District Plan and the term 'critical infrastructure' has been widely used. It is also important to recognise that due to the nature of critical infrastructure activities, there is often an operational and functional need for this infrastructure to be located in locations that may be susceptible to hazards.	Accept
S112.055	Waka Kotahi NZ Transport Agency	NH - Natural Hazards	NH-O5	Support	Retain as notified	Waka Kotahi supports these objectives	Accept in part
S121.044	Alliance Group Limited	NH - Natural Hazards	NH-Overview	Support	Retain as notified	The "Overview" section adequately states the context of the Natural Hazards chapter, particularly with respect to providing flexibility in the management response for existing developed areas subject to natural hazards.	Accept in part

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S40.035	Silver Fern Farms	NH - Natural Hazards	NH-Overview	Support	Retain as notified	The "Overview" section adequately states the context of the Natural Hazards chapter, particularly with respect to providing flexibility in the management response for existing developed areas subject to natural hazards.	Accept
S115.066	Kevin Robertson	NH - Natural Hazards	NH-Overview	Support in part	Amend Overview for clarity to enable non-liveable farm ancillary buildings as permitted activities within the natural hazard areas.	General support is given to the overview which identifies a risk-based approach to natural hazards. SFF supports enabling non-liveable farm ancillary buildings as permitted activities within the natural hazard areas as long as this has been clearly communicated to the landowners along with the associated risks of doing so. This means the landowner is fully informed when they make the decision to locate ancillary buildings that have a functional need in or around coastal and flood hazard areas.	Reject
S143.077	Rural Ratepayers Group	NH - Natural Hazards	NH-Overview	Support in part	Amend Overview for clarity to enable non-liveable farm ancillary buildings as permitted activities within the natural hazard areas.	General support is given to the overview which identifies a risk-based approach to natural hazards. SFF supports enabling non-liveable farm ancillary buildings as permitted activities within the natural hazard areas as long as this has been clearly communicated to the landowners along with the associated risks of doing so. This means the landowner is fully informed when they make the decision to locate ancillary buildings that have a functional need in or around coastal and flood hazard areas.	Reject
S148.078	Alistair & Bernadette Hunt	NH - Natural Hazards	NH-Overview	Support in part	Amend Overview for clarity to enable non-liveable farm ancillary buildings as permitted activities within the natural hazard areas.	General support is given to the overview which identifies a risk-based approach to natural hazards. SFF supports enabling non-liveable farm ancillary buildings as permitted activities within the natural hazard areas as long as this has been clearly communicated to the landowners along with the associated risks of doing so. This means the landowner is fully informed when they make the decision to locate ancillary buildings that have a functional need in or around coastal and flood hazard areas.	Reject

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S60.068	Ronald Crispin	NH - Natural Hazards	NH-Overview	Support in part	Amend Overview for clarity to enable non-liveable farm ancillary buildings as permitted activities within the natural hazard areas.	General support is given to the overview which identifies a risk-based approach to natural hazards. SFF supports enabling non-liveable farm ancillary buildings as permitted activities within the natural hazard areas as long as this has been clearly communicated to the landowners along with the associated risks of doing so. This means the landowner is fully informed when they make the decision to locate ancillary buildings that have a functional need in or around coastal and flood hazard areas.	Reject
S68.186	John Baynes	NH - Natural Hazards	NH-Overview	Support in part	Amend Overview for clarity to enable non-liveable farm ancillary buildings as permitted activities within the natural hazard areas.	General support is given to the overview which identifies a risk-based approach to natural hazards. SFF supports enabling non-liveable farm ancillary buildings as permitted activities within the natural hazard areas as long as this has been clearly communicated to the landowners along with the associated risks of doing so. This means the landowner is fully informed when they make the decision to locate ancillary buildings that have a functional need in or around coastal and flood hazard areas.	Reject
S126.065	Southland Federated Farmers of New Zealand	NH - Natural Hazards	NH-Overview	Support in part	Amend Overview for clarity to enable non-liveable farm ancillary buildings as permitted activities within the natural hazard areas.	General support is given to the overview which identifies a risk-based approach to natural hazards. SFF supports enabling non-liveable farm ancillary buildings as permitted activities within the natural hazard areas as long as this has been clearly communicated to the landowners along with the associated risks of doing so. This means the landowner is fully informed when they make the decision to locate ancillary buildings that have a functional need in or around coastal and flood hazard areas.	Reject
FS5.18	Hamish Weir			Support	Allow		Reject
S85.084	Environment Southland	NH - Natural Hazards	NH-Overview	Oppose in part	Oppose zone changes or provisions within existing zones which have the potential to intensify land use, development or risk within natural hazard areas (particularly flood inundation).	Caution needs to be exercised to ensure that communities are not unnecessarily exposed to natural hazard events. The GNS report identifies the extent to which the 2006 Gore District Plan meets best practice around managing natural hazards. The gaps identified in the	Accept in part

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					Draft the chapter to take on board the 2020 GNS report titled "Southland Regional Natural Hazard Provision Review" and to rectify the deficiencies outlined in the Operative Gore District Plan to ensure the new plan sufficiently managed natural hazard risks. The chapter overview should recognise that there are some existing historical flood protection works within GDC but acknowledge that these works were established to a design standard which have limits. Climate change impacts are likely to test and exceed flood protection works into the future and a precautionary approach is best when considering future development.	report should be resolved in the proposed Gore District Plan. Stop banks do not provide 100% protection from flood inundation. The February 2020 flood met the maximum design capacity for the Mataura River through Gore and Mataura. In the future it is anticipated that floods will get larger and accordingly the level of protection currently provided by the stop banks will diminish over time. The presence of stop banks should not necessarily provide an automatic green light for further land use change and development.	
FS5.19	Hamish Weir			Oppose	Disallow	Flood hazard considerations under the Operative District Plan are adequate as proven by the February 2020 event. Gore Township cannot avoid development protected by the existing flood banks as it would require the entire town centre to be relocated. Any increase will result in excessive consultation costs for Resource and Building Consents.	Accept in part
FS28.031	Kainga Ora			Oppose in part	Disallow in part	Kāinga Ora recognises the need for effective flood management, however, have the following concerns: - Climate change related mapping is not static, so flood mapping should sit outside of statutory plans to ensure that they can be updated as needed and reflect recent and up-to-date modelling - Some restrictions may be appropriate; however provisions should provide for management and mitigation which may include engineered solutions - Provisions should enable flood management to be managed at an area level (rather than property-by property), as this can sometimes allow for more effective and efficient management across a wider area Kāinga Ora considers that the relief sought is too restrictive.	Accept in part

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S112.058	Waka Kotahi NZ Transport Agency	NH - Natural Hazards	NH-P1	Support	Retain as notified	Waka Kotahi supports the risk-based approach as stated in this policy in the management of subdivision, use and development from natural hazards. Waka Kotahi supports the ongoing identification and management of natural hazard risks to determine the type, level and severity, sensitivity of activities and ability to recover after a natural hazard event.	Accept
S146.018	Southland District Council	NH - Natural Hazards	NH-P1	Support in part	Modification of policies to identify specific levels of risk within the district.	Modification of policies to identify specific levels of risk within the district would keep the same intent of the current policy while future-proofing the District Plan. We suggest taking into consideration the proposed National Policy Statement for Natural Hazard Decision-making 2023, which proposed to incorporate several provisions into their District Plan. Our suggestion intent to avoid the need for a future Plan Change to the proposed Gore District Plan.	Reject
S126.066	Southland Federated Farmers of New Zealand	NH - Natural Hazards	NH-P1	Support	Retain NH-P1 as drafted.	Support is given to a risk-based approach to natural hazards. Landowners must be consulted prior to and in the process of any mapping.	Accept
S115.067	Kevin Robertson	NH - Natural Hazards	NH-P1	Support	Retain NH-P1 as drafted.	Support is given to a risk-based approach to natural hazards. Landowners must be consulted prior to and in the process of any mapping.	Accept
S143.078	Rural Ratepayers Group	NH - Natural Hazards	NH-P1	Support	Retain NH-P1 as drafted.	Support is given to a risk-based approach to natural hazards. Landowners must be consulted prior to and in the process of any mapping.	Accept
S148.079	Alistair & Bernadette Hunt	NH - Natural Hazards	NH-P1	Support	Retain NH-P1 as drafted.	Support is given to a risk-based approach to natural hazards. Landowners must be consulted prior to and in the process of any mapping.	Accept
S60.069	Ronald Crispin	NH - Natural Hazards	NH-P1	Support	Retain NH-P1 as drafted.	Support is given to a risk-based approach to natural hazards. Landowners must be consulted prior to and in the process of any mapping.	Accept
S68.187	John Baynes	NH - Natural Hazards	NH-P1	Support	Retain NH-P1 as drafted.	Support is given to a risk-based approach to natural hazards. Landowners must be consulted prior to and in the process of any mapping.	Accept

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S85.087	Environment Southland	NH - Natural Hazards	NH-P1	Support in part	Leave as is	Modelling information and data used to make decisions on future zone changes and subsequent land use intensification should be provided to Environment Southland. Environment Southland will be undertaking some independent modelling analysis to ensure that flood mapping is accurate and future zoning is managed to prevent flood risk. This submission point applies to other natural hazard provisions, and also to all maps that show flood inundation.	Accept
FS5.22	Hamish Weir			Support in part	Allow in part	More accurate modelling of flood hazard would be a positive outcome as it provides certainty. Any modelling should be ground truth tested by records from Feb 2020, Nov 1999 and earlier flood events and not entirely mathematical / theoretical.	Accept
S112.059	Waka Kotahi NZ Transport Agency	NH - Natural Hazards	NH-P2	Support in part	Amend NH-P2 as follows: Manage the use, development and subdivision of land in all mapped Actual or Potential Inundation Areas, with the exception of the Stopbank Protection Areas by: 8. ensuring that the activity does not result in adverse effects on the safe and efficient operation and function of critical infrastructure.	Waka Kotahi generally supports this policy but is aware that the use, development and subdivision of land can exacerbate surface water flooding particularly on identified flood prone land if the activity is inappropriately located, planned or designed. Waka Kotahi notes that the Actual or Potential Inundation Areas as shown in the planning maps are often located near or directly adjacent to the State highway network. Waka Kotahi therefore seeks an amendment to this policy to ensure that the activity does not result in adverse effects on the safe and efficient operation and function of critical infrastructure to capture this issue within this policy.	Accept in part
S121.048	Alliance Group Limited	NH - Natural Hazards	NH-P2	Support	Retain as notified	The policy provides appropriate framework for the consideration of proposals located on land that is at risk of flooding.	Accept in part
S125.018	Ministry of Education	NH - Natural Hazards	NH-P2	Support	Retain as proposed.	The submitter supports NH-P2 and acknowledges risks from the actual or potential inundation areas poses to the safety of children and to assets. The policy is acceptable as it seeks to manage land within actual or potential inundation areas through several tests.	Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S146.019	Southland District Council	NH - Natural Hazards	NH-P2	Support in part	Modification of policies to identify specific levels of risk within the district.	Modification of policies, such as NH-P1, to identify specific levels of risk within the district would keep the same intent of the current policy while future proofing the District Plan. We suggest taking into consideration the proposed National Policy Statement for Natural Hazard Decision-making 2023, which proposed to incorporate several provisions into their District Plan. Our suggestion intent to avoid the need for a future Plan Change to the proposed Gore District Plan.	Reject
S16.041	Fuel Companies	NH - Natural Hazards	NH-P2	Support	Retain as notified	Support clause 4 of NH-P2 that requires hazardous substance storage to be 'resilient to' inundation as it appropriately acknowledges that hazardous substance storage is often located underground and could be considered 'inundated' already.	Accept
S40.037	Silver Fern Farms	NH - Natural Hazards	NH-P2	Support	Retain as notified	The policy provides appropriate framework for the consideration of proposals located on land that is at risk of flooding.	Accept in part
S85.088	Environment Southland	NH - Natural Hazards	NH-P2	Oppose	Split the policy so that there are two parts the first being change "manage" to "avoid" for new subdivision and the second part to manage the use and development on existing lots. Create a new policy to establish some management criteria for new subdivision and development where there is existing flood protection (eg Gore Main Street)	New subdivision on unprotected flood plains should be avoided. Minimal development should be allowed on existing properties within unprotected flood plains. Existing stop banks have a design limitation and climate change impacts will mean that the design standard will be exceeded in the future. A restrictive approach should be taken to land use development behind stop banks.	Accept in part
FS5.23	Hamish Weir			Oppose	Disallow	This is very restrictive to the Gore township and assumes that Environment Southland are not intending to use the rates taken for flood protection from Gore residents to upgrade existing flood protection assets.	Accept in part
FS28.033	Kainga Ora			Oppose in part	Disallow in part	Kāinga Ora recognises the need for effective flood management, however have the following concerns: - Climate change related mapping is not static, so flood mapping should sit outside of statutory plans to ensure that they can be updated as needed and reflect recent and up-to-date modelling - Some restrictions may be appropriate; however provisions	Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
						should provide for management and mitigation which may include engineered solutions - There should be a hierarchy of management in relation to the level of flood effects expected. Avoiding subdivision and development as a blanket requirement is overly onerous if flood levels are low and can be managed or mitigated. - Provisions should enable flood management to be managed at an area level (rather than property-by property), as this can sometimes allow for more effective and efficient management across a wider area Kāinga Ora considers that the relief sought is too restrictive	
FS29.038	Silver Fern Farms Limited			Oppose	Disallow	A blanket avoidance policy for all subdivision in flood prone areas is excessively restrictive, fails to consider differing levels of risk exposure for different activities and forecloses scope for appropriate mitigation. Otherwise, the submission seeks changes which are not specified in sufficient detail to allow potentially affected parties to comment meaningfully at this stage.	Accept in part
FS22.044	Clark Fortune McDonald & Associates			Oppose	Disallow	Oppose - not all subdivision is for the purpose of development. The focus should be on managing development in flood hazard areas, not trying to restrict subdivision without evidence that confirms a nexus between subdivision and development.	Reject
S122.004	Fulton Hogan	NH - Natural Hazards	NH-P2	Oppose in part	Use the same wording for NH-P2 clause 1 as clause 1 of NH-P3: NH-P2 Manage the use, development and subdivision of land in all mapped Actual or Potential Inundation Areas, with the exception of the Stopbank Protection Areas by: ~~1. ensuring that the activity is not likely to result in significant damage in a flood event; and~~ in the event of a natural hazard, there is likely to be no loss of life or serious injury and any built development is not likely to suffer significant damage or loss...	Clause 1 could be written more clearly.	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
FS28.032	Kainga Ora			Support	Allow	Kāinga Ora considers that the policy direction should reflect and respond to the level of risk and the degree of effect.	Accept
S125.019	Ministry of Education	NH - Natural Hazards	NH-P3	Support	Retain as proposed.	The submitter supports NH-P3 and acknowledges the risk the Mataura River Floodway poses to children and assets of the Ministry.	Accept in part
S146.021	Southland District Council	NH - Natural Hazards	NH-P3	Support in part	Modification of policies to identify specific levels of risk within the district.	Modification of policies, such as NH-P1, to identify specific levels of risk within the district would keep the same intent of the current policy while future proofing the District Plan. We suggest taking into consideration the proposed National Policy Statement for Natural Hazard Decision-making 2023, which proposed to incorporate several provisions into their District Plan. Our suggestion intent to avoid the need for a future Plan Change to the proposed Gore District Plan.	Accept in part
S126.067	Southland Federated Farmers of New Zealand	NH - Natural Hazards	NH-P3	Support in part	Amend NH-P3: Add italics emphasis to 'mahinga kai'	Mahinga kai is defined in the Plan's interpretation therefore italics emphasis should be added for consistency.	Accept
S132.044	KiwiRail Holdings Ltd	NH - Natural Hazards	NH-P3	Oppose in part	Amend as follows: Avoid subdivision, use and development and critical infrastructure (excluding the Rail Network) within the 'Mataura River Floodway'	KiwiRail opposes this policy in part as it has the potential to cause undue critical risk on the provisions of critical infrastructure within the Mataura River Floodway for KiwiRail. KiwiRail Bridge 348 Main South Line (MSL) crosses the Mataura River downstream of the State Highway 1 bridge. Work may be required in the future to protect Bridge 348 MSL, there is the potential that this work may be required outside of the KiwiRail designation within the Mataura Floodway.	Reject
S115.068	Kevin Robertson	NH - Natural Hazards	NH-P3	Support in part	Amend NH-P3: Add italics emphasis to 'mahinga kai'	Mahinga kai is defined in the Plan's interpretation therefore italics emphasis should be added for consistency.	Accept
S143.079	Rural Ratepayers Group	NH - Natural Hazards	NH-P3	Support in part	Amend NH-P3: Add italics emphasis to 'mahinga kai'	Mahinga kai is defined in the Plan's interpretation therefore italics emphasis should be added for consistency.	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S148.080	Alistair & Bernadette Hunt	NH - Natural Hazards	NH-P3	Support in part	Amend NH-P3: Add italics emphasis to ' mahinga kai '	Mahinga kai is defined in the Plan's interpretation therefore italics emphasis should be added for consistency.	Accept
S60.070	Ronald Crispin	NH - Natural Hazards	NH-P3	Support in part	Amend NH-P3: Add italics emphasis to ' mahinga kai '	Mahinga kai is defined in the Plan's interpretation therefore italics emphasis should be added for consistency.	Accept
S68.188	John Baynes	NH - Natural Hazards	NH-P3	Support in part	Amend NH-P3: Add italics emphasis to ' mahinga kai '	Mahinga kai is defined in the Plan's interpretation therefore italics emphasis should be added for consistency.	Accept
S85.089	Environment Southland	NH - Natural Hazards	NH-P3	Oppose	Remove "unless it can be demonstrated that the risks can be mitigated".	Significant natural hazard risk exists in the Matarua floodway (between the stop banks). All development, with the exception of critical infrastructure which has a specific need to be sited there, should be avoided.	Accept
FS5.24	Hamish Weir			Oppose	Disallow	The word 'avoid' should not be included.	Reject
S125.021	Ministry of Education	NH - Natural Hazards	NH-P4	Support	Retain as proposed.	The submitter supports NH-P4 and acknowledges that their assets should comply with this.	Accept
S146.023	Southland District Council	NH - Natural Hazards	NH-P4	Support in part	Modification of policies to identify specific levels of risk within the district.	Modification of policies, such as NH-P1, to identify specific levels of risk within the district would keep the same intent of the current policy while future proofing the District Plan. We suggest taking into consideration the proposed National Policy Statement for Natural Hazard Decision-making 2023, which proposed to incorporate several provisions into their District Plan. Our suggestion intent to avoid the need for a future Plan Change to the proposed Gore District Plan.	Reject
S121.049	Alliance Group Limited	NH - Natural Hazards	NH-P5	Support	Retain as notified	It is appropriate for policy to contemplate the full range of effects management measures, rather than applying a strict requirement for development to avoid areas subject to instability, subsidence and high liquefaction risk. The implementation of this policy through NH-R6, and the absence of rules relating to areas of "Negligible" or "Medium" liquefaction risk is supported.	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S125.023	Ministry of Education	NH - Natural Hazards	NH-P5	Support	Retain as proposed.	The submitter supports NH-P5 and acknowledges that certain areas are subject to risks, and these are required to be managed.	Accept
S146.024	Southland District Council	NH - Natural Hazards	NH-P5	Support in part	Modification of policies to identify specific levels of risk within the district.	Modification of policies, such as NH-P1, to identify specific levels of risk within the district would keep the same intent of the current policy while future proofing the District Plan. We suggest taking into consideration the proposed National Policy Statement for Natural Hazard Decision-making 2023, which proposed to incorporate several provisions into their District Plan. Our suggestion intent to avoid the need for a future Plan Change to the proposed Gore District Plan.	Reject
S40.038	Silver Fern Farms	NH - Natural Hazards	NH-P5	Support	Retain as notified	It is appropriate for policy to contemplate the full range of effects management measures, rather than applying a strict requirement for development to avoid areas subject to instability, subsidence and high liquefaction risk. The implementation of this policy through NH-R6, and the absence of rules relating to areas of "Negligible" liquefaction risk is supported.	Accept
S85.090	Environment Southland	NH - Natural Hazards	NH-P5	Oppose in part	A precautionary approach should be taken with medium liquefaction risk given fault lines in the Gore District.	Add in medium liquefaction risk to the policy.	Reject
FS5.25	Hamish Weir			Oppose	Disallow	Post Christchurch Earthquake the majority of concrete dwelling foundations are now 'raft' designs that specifically consider earthquake movement. They have structural integrity in themselves and can be releveled at a relatively low cost. Adding this will increase insurance costs unnecessarily and require unnecessary reporting for resource consents such as expensive geotechnical reports.	Accept in part
S112.060	Waka Kotahi NZ Transport Agency	NH - Natural Hazards	NH-P6	Support in part	retain as notified	Waka Kotahi supports the balanced approach adopted in this policy to look at reasonable alternatives, the design of the critical infrastructure to maintain its integrity and function during / after a natural hazard event and any significant adverse effects on people, cultural values and property.	Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S139.054	Hokonui Rūnanga Inc	NH - Natural Hazards	NH-P6	Support in part	Amend to read: "Avoid the placement of critical infrastructure in areas at risk from natural hazards, unless: ... 3. any significant adverse effects on people, cultural values, and property will be avoided and effects on mauti, any wāhi tapu, and access to and use of mahinga kai can be avoided, remedied or off-set. "	Wherever possible the plan provisions should specify the particular effects of concern to mana whenua to ensure the plan provisions are clear and that appropriate effects are identified and assessed, including when Hokonui Rūnanga Inc may be an affected party.	Accept in part
S146.025	Southland District Council	NH - Natural Hazards	NH-P6	Support in part	Modification of policies to identify specific levels of risk within the district.	Modification of policies, such as NH-P1, to identify specific levels of risk within the district would keep the same intent of the current policy while future proofing the District Plan. We suggest taking into consideration the proposed National Policy Statement for Natural Hazard Decision-making 2023, which proposed to incorporate several provisions into their District Plan. Our suggestion intent to avoid the need for a future Plan Change to the proposed Gore District Plan.	Reject
S85.091	Environment Southland	NH - Natural Hazards	NH-P6	Support in part	Alignment of terms provides clarity with definitions.	Align to provide consistency with objective 4 which talks about "regionally significant infrastructure". "Critical infrastructure" is not defined in the draft district plan.	Reject
S101.042	Transpower New Zealand Limited	NH - Natural Hazards	NH-P6	Support in part	Amend Policy NH-P6 as follows: "NH-P6 Avoid the placement of critical infrastructure in identified and mapped areas subject to natural hazards areas at risk from natural hazards, unless: 1. there is no reasonable alternative due to the an operational need or functional need for the location; and 2. it will be designed to maintain its integrity and function to the fullest possible extent, even though this may be at a reduced level , during and after a natural hazard event, or can be readily re-instated after a natural hazard event; and 3. any significant adverse effects on	As above, it is not always possible for infrastructure to be located outside of hazard risk areas. These requirements are generally understood to be operational needs and functional needs. Transpower considers that imposing a test of "no reasonable alternative" as well as "operational or functional need" is unnecessary and confusing. For this reason, Transpower seeks that reference to there being no reasonable alternative is deleted. In addition, Transpower considers that the initial clause of the Policy should clearly articulate where the Policy is intended to apply. Transpower seeks the inclusion of reference to the areas identified under Policy NH-P1. Transpower considers that clause (2) of the Policy is unnecessary on the basis that the intent of this clause appears to mirror the obligation	Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
					people, cultural values, and property will be avoided or mitigated to the extent practicable. "	on lifeline utilities under section 60 of the Civil Defence Emergency Management Act 2002 ("CDEMA"). For this reason, Transpower seeks amendments to clause (2) to ensure the obligation under the Proposed District Plan is that same as directed by the CDEMA. the Natural Hazards Section 32 Report does not clearly articulate the types of effects that are to be avoided and why the option to mitigate any such effects is not available. In this regard, it is considered that 'avoidance' goes beyond the direction to manage significant risks in section 6 of the RMA and, as such, Transpower seeks that mitigation is also available to address the effects of critical infrastructure in hazard risk areas.	
FS24.027	Contact Energy Ltd			Support	Allow	Contact support the relief sought as it provides greater certainty and clarity.	Accept in part
FS24.030	Contact Energy Ltd			Support	Allow	Contact support the relief sought as this provides recognition that certain activities, such as renewable electricity generation activities, have an operational need to be located in an area.	Accept in part
FS24.050	Contact Energy Ltd			Support	Allow	Contact support the relief sought as due to the nature of critical infrastructure activities, there may be circumstances when it is appropriate to restrict public access to protect both the infrastructure and safety of people.	Accept in part
S146.026	Southland District Council	NH - Natural Hazards	NH-P7	Support in part	Modification of policies to identify specific levels of risk within the district.	Modification of policies, such as NH-P1, to identify specific levels of risk within the district would keep the same intent of the current policy while future proofing the District Plan. We suggest taking into consideration the proposed National Policy Statement for Natural Hazard Decision-making 2023, which proposed to incorporate several provisions into their District Plan. Our suggestion intent to avoid the need for a future Plan Change to the proposed Gore District Plan.	Reject
S126.068	Southland Federated Farmers of New Zealand	NH - Natural Hazards	NH-P7	Support	Retain NH-P7 as drafted.	Support is given as this policy provides a nonregulatory approach.	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S115.069	Kevin Robertson	NH - Natural Hazards	NH-P7	Support	Retain NH-P7 as drafted.	Support is given as this policy provides a nonregulatory approach.	Accept
S143.080	Rural Ratepayers Group	NH - Natural Hazards	NH-P7	Support	Retain NH-P7 as drafted.	Support is given as this policy provides a nonregulatory approach.	Accept
S148.081	Alistair & Bernadette Hunt	NH - Natural Hazards	NH-P7	Support	Retain NH-P7 as drafted.	Support is given as this policy provides a nonregulatory approach.	Accept
S60.071	Ronald Crispin	NH - Natural Hazards	NH-P7	Support	Retain NH-P7 as drafted.	Support is given as this policy provides a nonregulatory approach.	Accept
S68.189	John Baynes	NH - Natural Hazards	NH-P7	Support	Retain NH-P7 as drafted.	Support is given as this policy provides a nonregulatory approach.	Accept
S109.142	Department of Conservation	NH - Natural Hazards	NH-P7	Support	Retain as notified	The D-G supports the objective and policy which seeks to encourage the use, maintenance and enhancement of natural features and buffers to manage the risks of natural hazards on the environment. This is in line with the NPS-IB (Clause 3.6) which seeks that Local Authorities recognise the role of indigenous biodiversity in mitigating the effects of climate change.	Accept
S110.025	Royal Forest and Bird Society of NZ Inc	NH - Natural Hazards	NH-P7	Amend	Change: Encourage the use, maintenance and enhancement of ~~natural features and buffers such as riparian planting~~ Nature Based Solutions to manage the risks of natural hazards on people, property, and the environment.	If the definition of Nature Based Solutions is included as suggested, this can include natural features, buffers, riparian plantings and more.	Reject
FS17.002	Federated Farmers			Oppose	Disallow	As later detailed, Federated Farmers opposes the inclusion of a definition for 'nature based solutions'. NH-P7 as notified provides a clear nonregulatory approach for plan users.	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S146.027	Southland District Council	NH - Natural Hazards	NH-P8	Support in part	Modification of policies to identify specific levels of risk within the district.	Modification of policies, such as NH-P1, to identify specific levels of risk within the district would keep the same intent of the current policy while future proofing the District Plan. We suggest taking into consideration the proposed National Policy Statement for Natural Hazard Decision-making 2023, which proposed to incorporate several provisions into their District Plan. Our suggestion intent to avoid the need for a future Plan Change to the proposed Gore District Plan.	Reject
S16.042	Fuel Companies	NH - Natural Hazards	NH-P8	Support	Retain as notified	Parts of Gore township, including some service stations are located within a stopbank protection area. The Fuel Companies support the encouragement of non-regulatory methods to inform the community of the flood risk as a result of stopbank failure.	Accept
S112.061	Waka Kotahi NZ Transport Agency	NH - Natural Hazards	NH-R1	Support	Retain as notified	Waka Kotahi supports these rules	Accept
S132.045	KiwiRail Holdings Ltd	NH - Natural Hazards	NH-R1	Support	Retain NH-R1 as proposed.	KiwiRail supports NH-R1 which provides for the maintenance of existing defenses against water as a permitted activity.	Accept
S121.050	Alliance Group Limited	NH - Natural Hazards	NH-R2	Support	Retain as notified	The proposed consenting framework, with a permitted activity status falling back to a restricted discretionary status (where finished floor level requirements are not met) and associated assessment matters, is efficient and reasonable.	Accept in part
S125.025	Ministry of Education	NH - Natural Hazards	NH-R2	Support	Retain as proposed.	The submitter supports NH-R2, acknowledging that their assets should comply with this. The submitter recognises that the policy provides for activities within these areas, subject to achieving a minimum finished floor level.	Accept in part
S139.056	Hokonui Rūnanga Inc	NH - Natural Hazards	NH-R2	Support in part	Make consequential amendments to align with the amendments sought to NH-P6.	Wherever possible the plan provisions should specify the particular effects of concern to mana whenua to ensure the plan provisions are clear and that appropriate effects are identified and assessed, including when Hokonui Rūnanga Inc may be an affected party.	Reject in Part

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S40.039	Silver Fern Farms	NH - Natural Hazards	NH-R2	Support	Retain as notified	The proposed consenting framework, with a permitted activity status falling back to a restricted discretionary status (where finished floor level requirements are not met) and associated assessment matters, is efficient and reasonable.	Reject
S85.092	Environment Southland	NH - Natural Hazards	NH-R2	Oppose	Exclude sensitive activities from being established on flood prone land as a permitted activity. Internal alterations should be a permitted activity. However, extensions, additions or new buildings on natural hazard prone land should trigger resource consents. The rules should be expanded to cover other natural hazard risks such as liquefaction and land instability etc.	Avoiding significant natural hazard risk is an important policy in the Regional Policy Statement. Establishing a minimum floor level as a permitted activity will incentivise land use change and development in areas of medium and high risk. A precautionary approach is needed with new subdivision, and development on land subject to natural hazards, particularly with climate change impacts moving forward. The rule should consider all natural hazards not just inundation.	Accept in part
FS5.26	Hamish Weir			Oppose	Disallow	These provisions should only apply to flood planes and not theoretically / mathematically flood prone land	Reject in part
FS28.034	Kainga Ora			Oppose in part	Disallow in part	Kāinga Ora agrees that the Gore PDP should respond to the likely natural hazard risks and that a precautionary approach is appropriate. However, the approach should also be flexible in being able to address the direct level and effect of a perceived risk and not be unnecessarily restrictive.	Accept in part
FS22.045	Clark Fortune McDonald & Associates			Oppose	Disallow	Oppose - the suggested 'precautionary approach' appears to be excessively restrictive given the size of urban areas in Gore and Mātāura that are subject to flood hazard coupled with the economic burden of consenting practically low risk activities such as building extensions and additions.	Accept in part
S85.093	Environment Southland	NH - Natural Hazards	NH-R3	Support	Keep rule	Establishing new flood protection works should be undertaken with detailed work and in partnership with numerous agencies.	Accept
S132.046	KiwiRail Holdings Ltd	NH - Natural Hazards	NH-R3	Oppose in part	Amend NH-R3 as follows: NH-R3 The construction of new or extended defences against water	KiwiRail opposes NH-R3 as it imposes limitations on KiwiRail protecting critical infrastructure by way of extending existing or creating new defences against water for bridges, culverts and the carriageway as some	Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
					All Zones Activity Status: Discretionary 1. Excluding the Rail Network.	works may fall outside of the designation. The inability to provide protection from erosion and scour during / following weather events it can result in failure / loss / instability of the structures and potentially lengths of line. It is therefore considered restrictive that erosion protection structures are likely to only require land use consents for works within the riparian margins under the proposed District Plan.	
FS27.013	Alliance Group Limited			Oppose	Disallow	The construction of new or extended defences for the Rail Network is most appropriately considered as a discretionary activity in part to allow consideration of possible adverse effects on neighbouring/ nearby land.	Accept
FS29.039	Silver Fern Farms Limited			Oppose	Disallow	The construction of new or extended defences for the Rail Network is most appropriately considered as a discretionary activity in part to allow consideration of possible adverse effects on neighbouring/nearby land.	Accept
S101.043	Transpower New Zealand Limited	NH - Natural Hazards	NH-R4	Oppose	Amend Rule NH-R4 as follows: "Activity status: Non-Complying Where: 1. The following activity is undertaken: (a) new structures or building, that is not critical infrastructure ; (b) ~~critical~~ Infrastructure (c) Sensitive Activities." As a consequence, amend Rule INFR-R9 as stated in provision submission	Opposes Rules NH-R4 on the basis that the Rule, insofar as it relates to the National Grid, fails to give effect to the NPSET. Non-complying activity status does not give effect to the NPSET; is more stringent than the 'avoid, remedy or mitigate' direction in the SRPS; and is inconsistent with Policy NH-P6 that does not prevent critical infrastructure that has an operational need or functional need for its location. Further, it is not clear why infrastructure that is not 'critical' is not similarly managed (and therefore is subject to a less stringent rule regime. Transpower considers that the development of critical infrastructure in the Mataura River Floodway may be better managed under Rule INFR-R9 and excluded from Rule NH-R4.	Accept in part
S132.047	KiwiRail Holdings Ltd	NH - Natural Hazards	NH-R4	Oppose in part	Amend NH-R4 as follows: Where: 1. The following activity is undertaken: (a) new structures or building (b) critical infrastructure (c) sensitive activities 2. This rule does not apply to activities in the	NH-R4 imposes limitations on KiwiRail protecting critical infrastructure as some works may fall outside of the designation, specifically the maintenance of bridge 348 MSL over the Mataura River.	Reject in Part

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
					Rail Network including the rail bridge over the Mataura River.		
S85.094	Environment Southland	NH - Natural Hazards	NH-R4	Support in part	Keep rule but include earthworks and afforestation. These activities shouldn't be allowed as of right on the floodplain.	Earthworks (cut or fill) and establishing trees can have an impact on the performance of the Mataura River Floodway.	Accept in part
FS5.27	Hamish Weir			Support in part	Allow in part	The Flood plain should be protected from obstruction but not a blanket ban on earthworks. The focus should be on large obstructions such as forestry not individual small accessory farm buildings and minor earthworks	Accept in part
FS22.046	Clark Fortune McDonald & Associates			Oppose	Disallow	Oppose - making all earthworks within the floodway a non-complying activity is not practical. Minor earthworks should remain a permitted activity, and earthworks above a certain threshold (which may differ from the threshold outside the floodway) should be restricted discretionary (with appropriate matters for discretion) or discretionary.	Accept in part
S101.044	Transpower New Zealand Limited	NH - Natural Hazards	NH-R5	Oppose	Amend Rule NH-R5 as follows: "Activity Status: Non-complying Where: 1. The activity is not infrastructure and involves constructing new buildings or structures, or additions to an existing building or structure on the river side of a Southland Regional Council stopbank." As a consequence, amend Rule INFR-R9- as stated in provision	Transpower opposes Rule NH-R5 and considers that it is not clear whether the Rule is intended to regulate infrastructure activities. On the assumption that Rule NH-R5 is intended to apply to the National Grid, Transpower considers that the Rule fails to give effect to the NPSET. The National Grid has an operational need and a functional need to be located on the river side of a stop bank (being linear infrastructure that must cross rivers). The non-complying activity status does not give effect to the NPSET; is more stringent than the 'avoid, remedy or mitigate' direction in the SRPS; and is inconsistent with Policy NH-P6 that does not prevent critical infrastructure that has an operational need or functional need for its location. Transpower considers that the development of critical infrastructure in the on the river side of stopbanks may be better managed under Rule INFR-R9 and excluded from Rule NH-R5.	Accept in part
S132.048	KiwiRail Holdings Ltd	NH - Natural Hazards	NH-R5	Oppose in part	Amend NH-R5 as follows: Where: 1. The activity involves constructing new buildings or structures, or	KiwiRail opposes NH-R5 as it imposes limitations on KiwiRail protecting critical infrastructure as some works may fall outside of the designation.	Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
					additions to an existing building or structure on the river side of a Southland Regional Council stopbank. 2. This rule does not apply to activities in the Rail Network		
S85.095	Environment Southland	NH - Natural Hazards	NH-R5	Support in part	Earthworks (cut or fill) and establishing trees can have an impact on the performance of the Mataura River Floodway.	Keep rule but include earthworks and afforestation. These activities shouldn't be allowed as of right on the floodplain.	Accept in part
FS22.047	Clark Fortune McDonald & Associates			Oppose	Disallow	Oppose - making all earthworks on the river side of a stopbank a non-complying activity is not practical. Minor earthworks should remain a permitted activity, and earthworks above a certain threshold (which may differ from the threshold outside the floodway) should be restricted discretionary (with appropriate matters for discretion) or discretionary.	Accept in part
S101.045	Transpower New Zealand Limited	NH - Natural Hazards	NH-R6	Oppose	Delete Rule NH-R6 in its entirety. Amend Rule INFR-R9 as stated in that provision	Opposes Rules NH-R6 on the basis that the Rule, insofar as it relates to the National Grid, fails to give effect to the NPSET. The non-complying activity status does not give effect to the NPSET; is more stringent than the 'avoid, remedy or mitigate' direction in the SRPS; and is inconsistent with Policy NH-P6 that does not prevent critical infrastructure that has an operational need or functional need for its location. Further, it is not clear why infrastructure that is not 'critical' is not similarly managed (and therefore is subject to a less stringent rule regime. Further, the Natural Hazards Section 32 Report fails to clearly articulate the risk of liquefaction to the National Grid, such that non-complying activity status is necessary or appropriate. In this regard, it is noted that liquefaction did not significantly compromise the National Grid during the Christchurch earthworks and that the National Grid is designed to be resilient to the natural hazards in any given receiving environment. Transpower considers that the development of critical infrastructure on land subject to a high or very high risk of liquefaction may be better managed under Rule INFR-R9 and Rule NH-R6 may be deleted.	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S112.062	Waka Kotahi NZ Transport Agency	NH - Natural Hazards	NH-R6	Support	retain as notified	Waka Kotahi supports these rules	Reject
S144.009	Contact Energy Limited	NH - Natural Hazards	NH-R6	Oppose	Oppose the non-complying activity status for critical infrastructure in NH-R6 and seek that NH-R6 be deleted	Seeking to avoid the placement of infrastructure may not be warranted given that hazard risk overlay areas are indicative only.	Accept
S85.096	Environment Southland	NH - Natural Hazards	NH-R6	Support in part	Expand to cover sensitive activities within this rule.	This rule only covers infrastructure on liquefaction prone land.	Reject
FS5.28	Hamish Weir			Oppose	Disallow	Current provisions are suitable	Reject
S85.103	Environment Southland	SUB - Subdivision	SUB-P4	Oppose	Include " medium, high and " in front of significant natural hazards	Recognise that natural hazard mapping is not entirely accurate and a precautionary approach to development should be taken. Enabling development in natural hazard areas with minimum floor levels will unnecessarily expose communities to a medium and high level of risk during a flood event.	Reject
FS5.83	Hamish Weir			Oppose	Disallow	This is excessive and does not feature in the operative GDP under which the February 2020 flood occurred with only the expected levels of damage being realized. This would encourage use of modelling for hazard assessment beyond what is currently undertaken at significant cost to resource consent processes. The models are often highly conservative due to the liability placed on the individuals preparing them.	Accept
FS28.038	Kainga Ora			Oppose	Disallow	Kāinga Ora considers that avoiding 'medium and high' natural hazard risk could be overly restrictive and potentially also inconsistent with s6 of the RMA and Policy NH.4 of the Southland Regional Policy Statement.	Accept
FS22.005	Clark Fortune McDonald & Associates			Oppose	Disallow	Oppose - unnecessary as natural hazard assessment is already required for subdivision without creating redundant extra policy.	Accept
S100.002	Charlton Rise Limited	SUB - Subdivision	SUB-P4	Support in part	Remove "avoid" from policy. Alternatively use "or" as per P5.	The word avoid prevents subdivision where constraints are present. Removing the word avoid will ensure hazards are managed. Subdivision may	Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
						be for land management purposes, not always necessarily resulting in risk to human life or property.	
FS28.037	Kainga Ora			Support in part	Allow in part	Kāinga Ora considers that the SUB-P4 should be amended as per S100.002 as follows: Significant natural hazard risk is avoided and other natural hazard risk is managed ~~and~~ <u>or</u> mitigated through mitigation measures such as compliance with lot density and minimum floor levels.	Accept in part
FS22.004	Clark Fortune McDonald & Associates			Support	Allow	Support - there are situations where constraints or hazards are present but subdivision is still appropriate or necessary for various purposes. Provided hazards are managed appropriately those subdivisions can be undertaken without increasing the risk from hazards.	Accept in part
S85.068	Environment Southland	UFD - Urban form and development	UFD-Overview	Oppose in part	Better evaluation of stormwater capacity is needed during flood events, particularly with regard to areas targeted for future development. Identify the importance of adequately mapping and protecting secondary flow paths in planning documents. Restrictions should be imposed for buildings, driveways and fences which are likely to impede secondary flow paths and redirect floodwater into other properties and assets.	The recent flash flooding events have revealed capacity issues within the stormwater network. Future localised high rainfall events will overwhelm urban stormwater networks and the management of secondary flow paths is an important consideration when enabling urban development.	Reject
FS5.8	Hamish Weir			Oppose in part	Disallow in part	Secondary flow paths are already covered under the Gore District Council Subdivision and Land Development Bylaw 2019. There is no need to place another layer of regulation over the provisions already in place. Doing so will likely result in unnecessary conflict between the regulations.	Accept
FS28.006	Kainga Ora			Support in part	Allow in part	Kāinga Ora recognises the need for effective stormwater management, however, have the following concerns: - Climate change related mapping is not static, so flood mapping should sit outside of statutory plans to ensure that they can be updated as needed and reflect recent and up-to-date modelling - Some restrictions may be appropriate; however provisions should provide for management	Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
						and mitigation which may include engineered solutions - Provisions should enable stormwater management to be managed at an area level (rather than property-by-property), as this can sometimes allow for more effective and efficient management across a wider area	
S152.017	Nigel Cowburn	Whole Plan	Whole Plan	Not Stated	Variable width riparian should be emphasised through text as it would put the function where it needs to be (tends to be headwaters and gully heads) and free up productive land. Retain allowance for use of exotics in flood control areas	The overview is more wordy than it needs to be, and makes it hard to read, in particular in relation to natural values. Riparian aspects are out of date. happy to see that plant species in flood control areas allows for the use of exotics as this is an engineering issue, and setting it to native only (as in some other jurisdictions) would impede successful design.	Reject
S140.001	Robina Johnston	UFD- Urban Form and Development	UFD- General	Not Stated	Considers managed retreat is needed for the Gore community, that growth needs to be projected for 30 years and the west of Gore is most appropriate for growth.	Not Stated	Reject
S121.032	Alliance Group Limited	HAZS – Hazardous Substances	HAZS-P1	Amend	Some mapped inundation areas are protected by stop banks. It is appropriate to recognise the benefits of stop banks relating to the management of significant hazardous facilities similar to that provided for other activities protected by stop banks elsewhere in the Proposed Plan, e.g. NH-P2. Amendments are also suggested to: Clarify the zoning/precinct that engages this policy. Align the policy with HAZS-01 which requires the prevention of significant adverse effect on the underlying relationship Ngāi Tahu hold with the natural environment.	Amend as follows: Manage adverse effects from new significant hazardous facilities locating in the General Industrial Zone or and Rural Industry Precinct by: (...) 2. locating significant hazardous facilities outside of, and setback from, sensitive environments and avoiding significant adverse effects on Ngāi Tahu cultural values; 3. locating significant hazardous facilities outside the Mataura River Floodway and all mapped district inundation areas not protected by the mapped Stop Bank Flood Protection Area to avoid the effects of natural hazards and protect the environment; and	Accept in part