

19 March 2025

Hearings Administrator
Proposed Gore District Plan
Gore District Council

By email: hearings@goredc.govt.nz

RE: Feedback on Minute 39 - Natural Features and Landscapes Chapter

1. We act for Alliance Group Limited ("**Alliance**") who lodged a submission (no. S121) and further submission (no. FS27) on the Proposed Gore District Plan ("**Proposed Plan**"). This submission and further submission relate to provisions of the Natural Features and Landscapes Chapter of the Proposed Plan, which was heard in Hearing Stream 9 on 12 February 2024.
2. This statement is in response to Minute 39 issued by the Panel on 18 February 2024, which seeks to further explore the role of the Natural Features and Landscapes Chapter in managing "*locally distinctive and valued natural features and landscapes*", which is the terminology used in the relevant provisions of the Southland Regional Policy Statement.
3. Alliance understands the Proposed Plan contains provisions specific to "*outstanding natural features and landscapes*" and several submissions to the Proposed Plan, and evidence received by the Panel, identifies a number of natural features and landscapes that are not considered to be "*outstanding*" but are sought to be managed by provisions in the Proposed Plan. Of relevance to Alliance this includes the main stem of the Mataura River - with Alliance's submission (S121.107) seeking to clarify the purpose of the Mata-Ura / Mataura River High Natural Character Feature as notified to consider any implications.
4. In light of the above, the Panel invited any submitters on the Natural Features and Landscapes Chapter to respond to several matters of interest in reaching decisions on submissions lodged to this chapter. Alliance's feedback to the matters listed in paragraph 2.1 of Minute 39 are set below.

5. Alliance generally supports the comments of the Gore District Councils planning advisor, Mishka Banhidi, with respect to the suitability of the indicative provisions to manage locally distinctive and valued natural features and landscapes (provided as Appendix 1 to Minute 39). These comments are set out in paragraphs 42 – 49 of her response dated 14 March 2025.
6. Alliance agrees with Mishka Banhidi that the proposed rule that enables an existing lawfully established activity to occur where scale is not increased could result in more onerous consenting requirements compared to identified “*outstanding natural features or landscapes*”. It is noted that the recommended Rule NFL-R1 provides for buildings and structures in an identified “*outstanding natural feature or landscape*” as a permitted activity where they are relatively small in size and have low reflectivity values. Overall, Alliance considers that any rule framework for “*locally distinctive and valued natural features and landscapes*” should be more permissive than the rule framework for “*outstanding natural features or landscapes*” to reflect the lower identified values of the natural feature or landscape.
7. Alliance also agrees with Mishka Banhidi that the proposed rule is largely covered by other chapters of the Proposed Plan. In particular:
 - a. The Earthworks Chapter already provides for setbacks from the Mataura River; and
 - b. The stream setback rule for buildings and structures applies to the Mataura River (noting that Alliance has undertaken extensive work to secure a bespoke setback rule in the General Industrial Zone for the Mataura Processing Plant as part of Hearing Stream 4).
8. Alliance thanks the Hearing Panel for its time and the opportunity to provide feedback on these matters. Please contact me if you wish to clarify any matters addressed herein.

Yours sincerely,



Doyle Richardson
Mitchell Daysh Limited

+61 27 537 8175

doyle.richardson@mitchelldaysh.co.nz